

Basic Assessment for the Proposed Development of a 115 MW Solar Photovoltaic (PV) Facility and associated electrical infrastructure (Kenhardt PV5), near Kenhardt, Northern Cape

Our Ref:



an agency of the
Department of Arts and Culture

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Date: Friday April 24, 2020
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Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Scatec Solar Africa

Scatec Solar Africa (Pty) Ltd (the project developer, trading as the applicant Kenhardt Solar PV 5) with support from Veroniva (Pty) Ltd, are proposing to develop three 115 MW Solar Photovoltaic (PV) Facilities and associated electrical infrastructure (including a 132 kV overhead power line from each PV Facility to the Eskom Nieuwehoop Substation), near Kenhardt in the Northern Cape. The proposed projects are referred to as “Kenhardt PV4, Kenhardt PV5 and Kenhardt PV6” and are located on the remaining extent of Onder Rugzeer Farm 168 and the connection points to the Eskom Nieuwehoop Substation on the remaining extent of Portion 3 of Gembok Bult Farm 120. These projects are proposed approximately 80 km south of Upington and 20-30 km north-east of Kenhardt within the !Kheis Local Municipality, Northern Cape Province.

The Council for Scientific and Industrial Research (CSIR) has been appointed by Scatec Solar (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed 115MW Solar Photovoltaic (PV) Facility and associated electrical infrastructure (Kenhardt PV 5), north east of Kenhardt, Northern Cape Province.

A draft Basic Assessment Report (dBAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed activities include solar arrays covering 250 ha and associated infrastructure such as offices, operational and maintenance control centre, warehouse/workshop, ablution facilities, convertor stations, on-site substation, guard houses, approximately 10 km 132kV powerline, internal 33kV powerlines/underground cables, underground low voltage cables, approximately 20 km of access roads, fencing, stormwater channels and laydown areas.

Natura Viva CC and ASHA Consulting (Pty) Ltd have been appointed to provide heritage specialist input as part of the BAR process as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Almond, J. E. 2019. Palaeontological Impact Assessment: Basic Assessment for the Proposed Development of a 100MW Solar Photovoltaic Facility (Kenhardt PV5) on Onder Rugzeer Farm 168 and associated electrical



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infrastructure, north-east of Kenhardt, Northern Cape Province.

The proposed development area is underlain at depth by Precambrian basement rocks that do not contain fossils. These rocks are overlain by Late Caenozoic sediments and Pleistocene aeolian sediments of the Gordonia Formation which contain sparse fossil remains. The impact of the development on palaeontological heritage is assessed as very low and no significant impacts are expected. A Chance Fossil Finds Procedure is recommended to be included in the EMPr.

Orton, J. 2019. Heritage Impact Assessment: Basic Assessment for the proposed construction of the Kenhardt PV5 Solar Photovoltaic Facility and associated electrical infrastructure, near Kenhardt, Northern Cape.

No site visit was undertaken as the author had surveyed the area in 2015. A total of six (6) heritage resources were identified within the PV 5 project area as a result of the 2015 survey. These include flakes quartz outcrops with associated Stone Age lithics, half a bored stone, and a two quartz handaxes all rated as resources of low heritage significance. According to the map on page 41 of the report, one heritage resource was identified within the PV5 powerline route which comprises a flaked quartz outcrop of low significance.

Recommendations provided in the report include the following:

- If the pan close to Nieuwehoop Substation is to be disturbed, then it should be checked for archaeological materials and a decision made as to whether mitigation is required;
- A pre-construction survey focusing on the well-defined water courses should be carried out to check for further significant stone artefacts scatters; and
- If any palaeontological or archaeological material or human burials are uncovered during the course of development, then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

In an Interim Comment issued on the 23/03/2020, SAHRA stated that the submitted HIA could not be accepted as no site visit was conducted for the proposed development. SAHRA APM unit notes the 2015 survey, however a new site visit should have been undertaken as erosion over the years may have uncovered additional heritage resources.

Since the issuing of the Interim Comment, a letter of response has been submitted to the case. The specialist

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provides several reasons why a site visit would not be beneficial as the landscape has proven to be stable and that erosion is extremely slow over the environment.

Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
 - A no-go buffer of 40 m must be maintained around the identified pan;
 - The pre-construction survey recommended by the specialist must include a survey of the final layout of the proposed development. A report providing the results of the survey must be submitted to the SAHRIS Case file for comment by SAHRA. No construction activities may occur without comment from SAHRA;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;

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- The Final BAR and EMPr must be submitted to SAHRA for record purposes;
- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/534818>
(DENC, Ref:)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.

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3. SAHRA reserves the right to request additional information as required.