

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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Enquiries: Natasha Higgitt
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CaseID: 15058

Date: Friday November 27, 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: Mr Dick Berlijn
Beta Solar Power Plant (Pty) Ltd.
2nd Floor West Tower
Maude Street
Nelson Mandela Square
Sandton, 2196

HIA for the proposed Kgalalelo PV Solar Power Project

Environamics has been appointed by Kgalalelo Solar Power Plant (RF) (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Kgalalelo Solar Power Plant near Olifantshoek, Northern Cape Province.

A draft Scoping Report (DSR) 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 development will include the construction of a PV panel array, access roads, on-site substation, underground electricity cables, auxiliary buildings, battery storage and fencing. The development will cover approximately 300 ha.

Dr Van Schalkwyk has been appointed to provide heritage specialists input into the EA application process as required by section 24(4)b(iii) of NEMA, and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Van Schalkwyk, J. A. 2020. Phase 1 Cultural Heritage Impact Assessment: The development of the proposed Kgalalelo Photovoltaic Solar Energy Plant near Olifantshoek in the Tsantsabane Local Municipality, Northern Cape Province.

A surface scatter of Middle Stone Age lithics including formal tools such as scrapers was identified near a quartz outcrop on the edge of the development footprint which has been rated as a site of low heritage significance. Possible graves were pointed out by the farm owner near the powerline, however no site could be identified. The approximate location is outside of the proposed development area and will not be impacted.



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Recommendations provided in the report include the following:

- If it is not possible to avoid the identified site, a permit is required from SAHRA;
- A desktop Palaeontological Assessment is required as the development footprint is located within an area of moderate sensitivity for palaeontological resources;
- A Chance Finds Procedure is recommended to be followed.

The Draft Scoping Report makes reference to a desktop Palaeontological Assessment conducted as part of the EA process, however no report has been submitted to SAHRA.

In an Interim Comment issued on the 07/04/2020, SAHRA requested that the completed palaeontological report be submitted for review.

Since the issuing of the Interim Comment, a desktop palaeontological report has been submitted for review (27/07/2020), however, SAHRA had noted that the EIA documents would need to be submitted before further comments could be issued. The EIA documents were submitted on the 29/10/2020.

Millstead, B. D. 2019. Desktop Palaeontological Heritage Impact Assessment Report on the site of a Proposed Solar Power Farm to be located along the Western Margin of the Farm Ruby Vale 266 R Ptn 2, near Olifantshoek, Northern Cape Province.

The proposed development area is underlain by the Brulsand Subgroup, Volop Group, Oliphantshoek Supergroup which does not contain fossils, and the superficial Cainozoic Kalahari Group deposits. These deposits may contain fossils in palaeodrainage system alluvial terraces and pan deposits. No pans or significant fluvial channels appear to be present in the study area.

The impact assessment concludes that there will be a negative low impact to palaeontological resources within the project area. However, there is an assumption that the potentially fossiliferous Cainozoic strata as discussed above may be present.

Recommendations provided in the report include the following:

- A thorough site investigation by a palaeontologist as part of a Full Palaeontological Impact Assessment prior to the commencement of construction;

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- The investigation should cover the regions identified as areas A and B (where the solar collection panels will be erected) as well as the area underlying the route of the electrical cable connecting areas A and B to the Lewensaar Substation;
- A Full Palaeontological Impact Assessment report should be compiled and submitted to SAHRA for its consideration and recommendations;
- Should scientifically or culturally significant fossil materials exist within the project area any negative impact upon them should be mitigated by excavation or preserved in-situ.

The Draft EIA notes that no further palaeontological assessments are required (page 119), however, this is not inline with the recommendations in the PIA report as discussed above.

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 EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The recommendations of the archaeological specialist is supported and must be adhered to. It must be noted that the recommendations of the palaeontologist are not supported, as no pan or alluvial deposits occur in the area. The SAHRA APM unit recommends that only a Fossil Finds Procedure be implemented as recommended in the DEIA;
- 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:

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- 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;
- The Final EIA and EMPr must be submitted to the case 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/536096>
(DEA, Ref:)

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