



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 15501

Date: Tuesday October 13, 2020  
Page No: 1

## Final Comment

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

Attention: Savannah Environmental (Pty) Ltd

PO Box 148  
Sunninghill  
2157

**To include the construction and operation of a Battery Energy Storage System (BESS) for the authorised Sirius Solar PV Project Two, with a contracted capacity of up to 4.5MWh into the project description of the Environmental Authorisation (EA), as well as an increase in the contracted capacity of Sirius Solar PV Project two by 75MW within the authorised development footprint. The BESS will have a footprint of approximately 6.5ha and will be developed within the authorised footprint of Sirius Solar PV Project Two in close proximity to the substation. The BESS will connect to the authorised on-site facility substation of Sirius Solar PV Project Two via underground cables.**

Savannah Environmental (Pty) Ltd has been appointed by Sirius Solar PV Project Two RF (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application process for the authorised Sirius Solar PV Project Two, near Upington, Northern Cape Province (14/12/16/3/3/2/481).

A draft Motivational Report 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 amendment will include increasing the generation capacity to 75MW and the construction of a Battery Energy Storage System within the authorised development footprint of the solar PV facility.

SAHRIS Case ID 1844 has reference

(<https://sahris.sahra.org.za/cases/sirius-solar-pv-project-near-upington-469-481>). SAHRA had no objections to the proposed development and provided conditions. Previous recommendations provided by the specialist include that a suitably qualified heritage practitioner be appointed by the developer to perform periodic inspections of excavated materials (preferably fortnightly) to ensure that no sub-surface sites be damaged.

Banzai Environmental (Pty) Ltd and Heritage Contracts and Archaeological Consulting have been appointed to provide heritage specialist input as part of the EA Amendment application report 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



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 15501

Date: Tuesday October 13, 2020  
Page No: 2

(NHRA).

*Butler, E. 2020. Palaeontological Letter of Exemption for the Sirius Solar PV Project Two Part 2 Amendment, Northern Cape Province.*

The development area is underlain by unfossiliferous metamorphic basement rocks namely the Bethesda Formation and the Dayson Klip gneiss which are overlain by superficial sediments of low palaeontological sensitivity. The proposed amendment will not lead to detrimental impacts on palaeontological resources and a Chance Finds Protocol is recommended.

*Van der Walt, J. 2020. Re: Heritage Statement – Proposed Battery Energy Storage System (BESS) of up to 4.5MWH, and an increase of the contracted capacity of the authorised Sirius Solar PV Project Two by 75MW.*

No heritage resources were previously identified within the area where the BESS is proposed to be situated. There will be no change to the identified impacts as a result of the proposed amendment.

## 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 Motivational Report and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed amendment of the authorised 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 report detailing the results of the previously recommended monitoring of the construction phase must be submitted to SAHRA upon completion of the construction phase for review and comment;
- 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)

Our Ref:



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 15501

Date: Tuesday October 13, 2020  
Page No: 3

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;
  - The Final Motivational Report 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

Our Ref:



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 15501

Date: Tuesday October 13, 2020  
Page No: 4

South African Heritage Resources Agency

---

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/539844>  
(DEA, Ref: 14/12/16/3/3/2/481)

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