

Our Ref: 15532



an agency of the
Department of Arts and Culture

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CaseID: 15532

Date: Tuesday October 20, 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: Mulilo Renewable Project Developments (Pty) Ltd

Amendment of EA to include a Battery Energy Storage System (BESS) to the project description

Landscape Dynamics has been appointed by Mulilo Renewable Project Developments (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application process for the authorised Hoekplaas Solar PV3 Battery Energy Storage System, near Copperton, Northern Cape Province (DEFF Ref Nr: 14/12/16/3/3/2/494).

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 the installation of a battery energy storage system (BESS) within the authorised footprint (the location of the authorised laydown area) covering less than 14.2 ha.

A previous SAHRIS Heritage Report has reference (<https://sahris.sahra.org.za/heritage-reports/aiahoekplaaspv2503ortonjjan12>). Comments issued on the 16/05/2012 noted that SAHRA had previously supported the recommendations of the author and provided conditions. These conditions include bufferzones around the pans, possible mitigation of sites HKP2011/004 and 006, noting that Alternative 2 was the preferred option and the inclusion of a chance finds procedure.

ACO Associates cc and Natura Viva cc had 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 (NHRA).

Gribble, J. 2020. Hoekplaas 2-4 and Klipgats 3 and 7 Solar Facilities Environmental Authorisation Amendment: Specialist Impact Statement.

Only results pertaining to Hoekplaas PV3 will be discussed here.

No heritage resources were previously identified within the laydown area where the BESS is proposed to be situated. The only change in impacts is to the landscape sense of place, as the stacking of the BESS units will



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be visually intrusive. It is recommended that in order to mitigate this impact, the BESS units should not be stacked. There will be no further change to the identified impacts as a result of the proposed amendment.

Almond, J. E. 2020. Palaeontological Heritage Resources Comment on Proposed Amendment: Proposed Battery Energy Storage System for five Authorised Mulilo Solar PV Facilities (Klipgats Solar PV3, Klipgats Solar PV7, Hoekplaas Solar PV2, Hoekplaas Solar PV3, Hoekplaas Solar PVFour, near Prieska, Siyathemba Local Municipality, Northern Cape.

Only results pertaining to Hoekplaas PV3 will be discussed here.

The proposed amendments will not change the nature or significance of any impacts assessed as part of the original PIA report. No further recommendations are provided.

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 EMP:

- 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 specialists are supported and must be adhered to. No further additional specific conditions are provided for the development;
- 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 Motivational Report and EMPr must be submitted to SAHRA for record purposes;
- The decision regarding the EA Amendment 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/540325>
(, Ref:)

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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.