

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
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 16055

Date: Wednesday March 10, 2021
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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: South Africa Mainstream Renewable Power Development (Pty) Ltd

Part 2 EA amendment application for the Douglas Solar Energy Plant grid connection, Northern Cape

Landscape Dynamics has been appointed by South Africa Mainstream Douglas Solar (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application for the proposed amendments to the authorised Douglas Solar Energy Plant, near Douglas, Northern Cape Province (DEFF Ref Nr: 12/12/20/2512).

A draft Motivational Amendment Report has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed amendments include the construction of a powerline from the plant to the Ovaal Pump Substation. The original authorised route is no longer viable and one of the previous alternative routes is being proposed. Three alternative routes were assessed as part of the original application. Project components include a 132kV powerline, substation and operation and maintenance buildings.

A previous application was made to SAHRA in 2012, before the launch of SAHRIS. The original report (<https://sahris.sahra.org.za/heritage-reports/aiadouglas2512pvmorrisdapr12>) conducted by Prof David Morris assessed the three alternatives. SAHRA issued a comment on the 4th of July 2012, noting no objections to the proposed solar facility. The comment also referenced previous comments (the hardcopies could not be located) noting that exemption for further palaeontological work was granted on the 17th May 2012.

Prof David Morris of the McGregor Museum was appointed to provide heritage specialist input as part of the EA Amendment 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).

Morris, D. 2021. Addendum to the 2014 Heritage Impact Assessment (Chapter 9) in the Mainstream Renewable Power South Africa Environmental Impact Assessment Final Report for Douglas Solar Energy Project in the Northern Cape Province, South Africa.

Based on the results of the 2012 assessment and a confirmation letter in 2014, and a site verification survey conducted in 2021, the heritage specialist confirmed that no heritage resources of significance would be

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impacted by either alternative as part of the amendment application. Surface scatters of Stone Age lithics were noted, however these are of low significance and no mitigation is required. Alternative Route 2 is the preferred option, as Alternative Route 1 has a higher risk of impacting unknown heritage sites. A Chance Finds Procedure is recommended to be implemented.

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 Amendment Report and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed amendments to the authorised 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:
 - 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 Amendment 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.

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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: <https://sahris.sahra.org.za/node/555665>
(, 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.
3. SAHRA reserves the right to request additional information as required.