

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: 16202

Date: Wednesday March 31, 2021
Page No: 1

Interim Comment

In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Savannah Environmental (Pty) Ltd

PO Box 148
Sunninghill
2157

The Applicant, Kotulo Tsatsi Energy (Pty) Ltd, is proposing the construction of a photovoltaic (PV) solar energy facility (known as the Kotulo Tsatsi Energy PV1) located on a site located approximately 70km south-west of the town of Kenhardt and 60km northeast of Brandvlei in the Northern Cape Province. The solar energy facility will comprise several arrays of PV panels and associated infrastructure and will have a contracted capacity of up to 200MW. The facility will be located within the farm Portion 3 of Farm Styns Vley 280. The PV facility is planned to be located adjacent to the authorised 100MW Kotulo Tsatsi PV2 facility, and within an area previously authorised for CSP project infrastructure. The project site 1 falls under the Hantam Local Municipality which is part of Namakwa District Municipality. The site is accessible via an existing gravel farm road (known as Soafskolk Road) which provides access to the farm off of the R27 which is located east of the project site. The PV infrastructure assessed in this application is in response to the Applicant's need to change the authorised generation technology for the facility located on the farm Portion 3 of Farm Styns Vley 280. That is, a technology change from the previously authorised CSP project infrastructure to PV project infrastructure. In this regard, the solar PV facility will be connected to the grid via a previously authorised grid connection solution 2, which consists of a collector substation, switching station and a power line to the Eskom Aries Substation located north-east of the project site. Kotulo Tsatsi Energy PV1 is planned to be bid into the Department of Mineral Resources and Energy's (DMRE) Renewable Energy Independent Power Producer Procurement (REIPPP) Programme with the aim of evacuating the generated power into the national grid. This will aid in the diversification and stabilisation of the country's electricity supply with Kotulo Tsatsi Energy PV1 set to inject up to 200MW AC into the national grid. A development envelope of ~847ha was defined through the Scoping evaluation of the site, and has now been assessed for the project which includes the PV infrastructure required to generate 200MW of electricity. The infrastructure to be developed within the development envelope will be known as the development footprint and will have an extent of ~810ha. The infrastructure associated with this PV development includes: » Solar PV array footprint comprising of: PV modules

PROPOSED DEVELOPMENT OF KOTULO TSATSI ENERGY PV 1 NEAR KENHARDT, NORTHERN CAPE

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and mounting structures Inverters and transformers Integrated Energy Storage System (IESS) Cabling between the project components Internal access roads » Access roads, internal distribution roads and fencing around the development footprint » Admin block comprising of: Site offices and maintenance buildings, including workshop areas for maintenance and storage. Assembly plant Laydown areas The assessment of the PV facility on the site is to support the technology change from the previously authorised CSP project infrastructure to PV project infrastructure. In this regard, the following previously authorised infrastructure will be retained for use for the planned PV facility, and the associated footprint areas of the following previously authorised infrastructure have not been reassessed in this EIA: » Complete grid connection to Aries Substation: Grid connection via a previously authorised grid connection solution, which consists of internal grid reticulation, a collector substation, switching substation and a power line to the Eskom Aries Substation located north-east of the project site.

Savannah Environmental (Pty) Ltd has been appointed by Kotulo Tsatsi Energy (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Kotulo Tsatsi Energy PV 1, Portion 3 of Farm Styns Vley 280, near Kenhardt, Northern Cape Province (DEFF Ref no: 14/12/16/3/3/2/2027).

A draft Environmental Impact Assessment (EIA) Report has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. It must be noted that SAHRA was not provided an opportunity to provide comments during the Scoping Phase of the EA application. The proposed development will include a solar array of PV modules, inverters and transformers, Integrated Energy Storage System, cabling between the projects components, internal access roads, fencing, admin block comprising of site officers, maintenance buildings, workshop areas, assembly plant and laydown areas. The development will cover 810 ha and will be located adjacent to the authorised 100MW Kotulo Tsatsi PV2 facility, and within an area previously authorised for CSP project infrastructure.

SAHRIS Case ID 8681 has reference (<https://sahris.sahra.org.za/cases/solarreserve-kotulo-tsatsi-concentrated-solar-plant-1>). In a Final Comment issued on the 05/04/2016, SAHRA noted no objections to the proposed development and provided conditions for the development. This is reiterated in a Final Comment issued on the 16/05/2016.

CTS Heritage (Pty) Ltd was appointed to provide heritage specialist input 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).

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Lavin, J. 2021. Heritage Impact Assessment in terms of Section 38(8) of the NHRA for the proposed development of Kotulo Tsatsi Energy PV 1 near Kenhardt, Northern Cape.

The HIA is based off the results of a recent Archaeological Impact Assessment and a previous Palaeontological Impact Assessment (2015).

Lavin, J. 2021. Archaeological Specialist Study In terms of Section 38(8) of the NHRA for a proposed development of Kotulo Tsatsi Energy PV 1, PV3 And PV4 Near Kenhardt, Northern Cape

*Only the results pertaining to PV 1 will be discussed below.

A total of nine heritage resources were identified within PV 1. These include surface scatters of Stone Age lithics, farming infrastructure of negligible heritage significance and two Palaeontological sites of low heritage significance. No other heritage resources were identified. A Chance Finds Procedure and a Chance Fossil Finds Procedure are recommended to be implemented.

Interim Comment

The SAHRA APM unit notes the previous PIA study referenced in the HIA and will accept a letter from the specialist confirming that the results of the previous study are valid for the current activities under application.

SAHRA advises the applicant to extend the EA process in terms of section 23(1)b of the NEMA EIA regulations in order to comply with this comment.

Further comments will be issued upon receipt of the above letter.

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

Yours faithfully

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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/561926>