

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
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 17542

Date: Friday June 10, 2022
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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: Savannah Environmental (Pty) Ltd

PO Box 148
Sunninghill
2157

Great Karoo Renewable Energy (Pty) Ltd is proposing the construction and operation of a photovoltaic (PV) solar energy facility and associated infrastructure on Portion 0 of Farm Rondavel 85, located approximately 35km south-west of Richmond and 80km south-east of Victoria West, within the Ubuntu Local Municipality and the Pixley Ka Seme District Municipality in the Northern Cape Province. A preferred project site with an extent of ~29 909ha and a development area of ~577ha within the project site has been identified by Great Karoo Renewable Energy (Pty) Ltd as a technically suitable area for the development of the Moriri Solar PV Facility with a contracted capacity of up to 100MW. The Moriri Solar PV Facility project site is proposed to accommodate the following infrastructure, which will enable the facility to supply a contracted capacity of up to 100MW: Solar PV array comprising PV modules and mounting structures. Inverters and transformers. Cabling between the panels. 33/132kV onsite facility substation. Cabling from the onsite substation to the collector substation (either underground or overhead). Electrical and auxiliary equipment required at the collector substation that serves that solar energy facility, including switchyard/bay, control building, fences, etc. Battery Energy Storage System (BESS). Site offices and maintenance buildings, including workshop areas for maintenance and storage. Laydown areas. Access roads and internal distribution roads. The solar PV facility is proposed in response to the identified objectives of the national and provincial government and local and district municipalities to develop renewable energy facilities for power generation purposes. It is the developer's intention to bid for the Moriri Solar PV Facility under the Department of Mineral Resources and Energy's (DMRE's) 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, in line with the objectives of the Integrated Resource Plan (IRP) with the Moriri Solar PV Facility set to inject up to 100MW into the national grid. The project is planned as part of a larger cluster of renewable energy projects, which include two (2) 140MW Wind Energy Facilities (known as Merino Wind Farm and Angora Wind Farm) two (2) additional 100MW PV facilities (known as Nku Solar PV and Kwana Solar

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PV), as well as the grid connection infrastructure connecting the renewable energy facilities to the existing Eskom Gamma Substation.

Savannah Environmental (Pty) Ltd has been appointed by Great Karoo Renewable Energy (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed establishment of the Moriri Solar PV Facility on Portion 0 of Farm Rondavel 85, near Richmond, Northern Cape Province.

A draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations. The proposed activities include the construction of a solar PV array, inverters and transformers, cabling between panels, 33/132 kV on site substation, switchyard, control building, fences, battery energy storage system, site and maintenance offices, workshop areas, laydown areas, access roads and internal distribution roads.

CTS Heritage has been appointed to provide heritage specialist input into the EA process as per section 24(4)b(iii) of the NEMA and section 38(3) and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Lavin, J. 2021. Desktop Heritage Screening Assessment for the Proposed Moriri Solar PV Facility to be developed as part of the Great Karoo Renewable Energy Development near Richmond in the Northern Cape.

The proposed project footprint has not been previously subjected to heritage assessments and therefore gaps in the knowledge of the heritage in the area exist. The surrounding areas are known to contain Stone Age lithic occurrence, rock art, historical farming heritage resources and colonial history. Additionally, it is very likely that the proposed development will have a negative impact on the cultural and scenic value of the landscape. The SAHRIS PalaeoSensitivity map shows the proposed project footprint is located in an area of moderate and very high sensitivity for palaeontological resources.

Recommendations provided in the report include the following:

- Archaeological field surveys must provide sufficient ground-coverage of the areas to be developed to be able to determine the nature of the resources likely to be impacted. Palaeontological and cultural landscape field surveys will target sensitive geological and cultural landscape features.

In an Interim Comment issued on the 03/12/2021, SAHRA noted the pending assessment of the impact to heritage resources and provided conditions for the specialist reports. Since the issuing of the Interim



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Comment, the Draft EIA inclusive of appendices and the heritage reports has been submitted for review (17/05/2022).

Lavin, J. 2022. Heritage Impact Assessment in terms of Section 38(8) of the NHRA for the Proposed Nku, Moriri and Kwana PV Facilities which form part of the Great Karoo Renewable Energy Facility development near Richmond in the Northern Cape.

The HIA has incorporated the results of three heritage sub-specialist studies and contains the following recommendations:

- The recommendations of the VIA must be implemented;
- A 50m no development buffer area must be implemented around site GK048;
- A 1km no-go development buffer be maintained around Site GK038 and a 500m no-go development buffer be maintained around Site GK037 to ensure that no impact occurs. This no-go development buffer refers to new infrastructure and not the existing roads to be used by the PV facilities;
- The HWC Chance Fossil Finds Procedure must be implemented for the duration of construction activities; and
- A Chance Finds Procedure is recommended to be implemented.

The Heritage reports that were incorporated into the HIA includes the following:

Almond, J. A. 2022. Palaeontological Heritage Specialist Reports: Combined Desktop and Field-Based Study - Combined Project Area for the Great Karoo Renewable Energy Cluster near Richmond, Northern Cape Province

The proposed development area is underlain by bedrocks of the Late Permian Teekloof Formation and the Abrahamskraal Formation. No fossils were identified within the PV footprint of the Moriri PV project, however a site containing possible vertical burrows and/or plant stem casts, microbial mat textures and small-scale invertebrate trace fossils of Grade IIIC heritage significance was identified near a proposed road. The anticipated impact significance of the proposed development is likely to be very low.

Lavin, J and Wiltshire, N. 2022. Archaeological Specialist Study In terms of Section 38(8) of the NHRA for a Proposed Great Karoo Renewable Energy Facility development near Richmond in the Northern Cape

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The identified non-conservation worthy resources include Stone Age lithics and farming infrastructure. Grade IIIB Heritage Resources identified within or adjacent to the proposed development footprint include Middle and Later Stone Age lithics, historic stone-walled structures and the historic Rondawel farmhouse complex of was assessed to be of Grade IIIA heritage significance.

Winter, S and Wilson, W. 2021. Cultural Landscape Assessment for the Proposed Development of the Great Karoo Renewable Energy Facility near Richmond in the Northern Cape.

The current cultural landscape located in the Central Plateau of the Great Karoo with the N1 road as a dominant feature and artery is defined as a farming landscape focused on water availability with layers of historical colonial settlement and frontier movement, and more modern farming methods, game-farming, nature tourism, and event-based economy, and now the renewable energy industry.

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 EIA 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. Further additional specific conditions are provided for the development as follows:
 - If it is not possible to avoid site GK037, a permit in terms of section 35 of the NHRA must be applied from SAHRA to mitigate the site prior to the construction phase;
 - If it is not possible to avoid site GK038, a permit for the surrounding werf in terms of section 35 of the NHRA must be applied for from SAHRA, while any mitigation to the werf structures must be applied for in terms of section 34 of the NRHA from the Northern Cape Provincial Heritage Resources Authority;
- 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)

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Unit (Thingahangwi Tshivhase/Ngqabutho Madida 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 of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
- 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 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

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ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/588967>

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.