

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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CaseID: 17965

Date: Friday December 09, 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: Mr Shaun Macgregor  
Ecoleges Environmental Consultants  
PO Box 9005  
NELSPRUIT  
1200

**The development of a 400 MW Solar Photovoltaic (PV) facility (Phase 3) on the Remainder of Farm Goede Hoop 26C and Portion 3 of Farm Goede Hoop 26C, between De Aar & Hanover, Emthanjeni Local Municipality, Pixley Ka Seme District Municipality, Northern Cape Province, South Africa**

Ecoleges Environmental Consultants has been appointed by Soventix South Africa (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed 400MW Solar PV Facility on the Remainder of Farm Goede Hoop 26C and Portion 3 of Farm Goede Hoop 26C, between De Aar & Hanover, Northern Cape Province.

A draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development (600 ha) will include the construction of solar panels, inverters, transformers, on-site substation, 66 to 132KV overhead distribution line, construction camp and laydown area, rack foundations, pylon footings, underground cables, water pipes, roads, fire break and fencing posts, borrow pit, water tanks and deionization plant(s), two track access roads, existing roads to be upgraded and road crossings, fencing, and waste water system.

Natura Viva CC and APelser Archaeological Consulting were 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).

*Almond, J. E. 2022. Site Sensitivity Verification Report (in terms of Part A of the Assessment Protocols Published in GN 320 On 20 March 2020). Proposed Development of a 400 Mw Solar Photovoltaic Facility on the Remainder of Farm Goede Hoop 26C and Portion 3 of Farm Goedehoop 26C, between De Aar & Hanover,*



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*Emthanjeni Local Municipality, Pixley Ka Seme District Municipality, Northern Cape Province, South Africa.*

The proposed development footprint is underlain by the potentially fossiliferous sediments of the Adelaide Subgroup, however based on recent fieldwork (2021 and 2022) conducted in the development area, no high sensitivity fossil sites are located within the proposed development area. Fossils identified include breccia with bone and wood fragments, invertebrate burrows, and reworked silicified wood fragments of low heritage significance. A Chance Fossil Finds Procedure is recommended to be followed.

*Pelser, A. 2022. A Report on a Phase 1 Archaeological & Heritage Impact Assessment related to the Development of a 400 MW Solar Photovoltaic (PV) Facility and Associated (Phase 3) on the Remainder of Farm Goede Hoop 26C, Portion 3 of Farm Goede Hoop 26C and other properties, between De Aar & Hanover, Emthanjeni Local Municipality, Pixley Ka Seme District Municipality, Northern Cape Province, South Africa.*

It is noted that large sections of the development footprint could not be surveyed due to heavy unseasonal rainfall. It is also noted that several heritage resources were identified as part of previous assessments conducted in 2017 and 2021, while additional sites were identified as part of the 2022 field assessment.

A total of 31 heritage resources were identified as part of the 2022 field assessment. These include open air surface scatters of Stone Age lithics of low to medium heritage significance, a stone built kraal and stone cairn of low heritage significance, and stone cairns of medium to high heritage significance that may be markers along the old wagon road linking historical farmsteads.

Recommendations provided in the report include the following:

- Detailed mapping of the Stone Age sites to determine their extents; and
- Surface collection of material to obtain a representative sample of Stone Age material and types to determine the age of the material and sites;
- Desktop Research on the age, origin and function of the road;
- Detailed mapping and photographic recording of the section of the road located in the development footprint;
- Preserving a section of the possible road located within the development footprint and the erection of Information Signage on the history of the road;
- All of the above recommended work must be completed by an appropriately qualified heritage

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- specialist;
- A Chance Find Procedure must be implemented.

In an Interim Comment issued on the 04/10/2022, SAHRA requested that the HIA be revised to include a discussion on previously identified heritage resources. Since the issuing of the Interim Comment, a revised HIA has been submitted (10/11/2022). The revised HIA provided the requested information regarding previously identified heritage resources.

## 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 EMPr:

- 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:
- Permits in terms of section 35 of the NHRA must be applied for from SAHRA for the collection of archaeological material prior to construction. No construction may commence without a permit in this regard;
- All mapping data of sites must be provided to SAHRA prior to construction;
- A buffer of 30 m must be adhered to around the wagon road (points 19 -25). A report containing the research, recording, mapping and further recommendations for the road must be submitted to SAHRA for comment prior to construction;
- 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/ 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;

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- 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:
- With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above;
- 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

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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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Phillip Hine  
Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/592717>

**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.