

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
Tel: 021 462 4502
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CaseID: 18161

Date: Wednesday September 21, 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

San Solar Energy Facility (Pty) Ltd proposes the development of the San Solar PV facility, a photovoltaic (PV) solar energy facility and associated infrastructure, on a site located approximately 16km north west of Kathu in the Northern Cape Province. The solar PV facility will be developed on the Remaining extent of the Farm Wincanton 472 and comprise several arrays of PV panels and associated infrastructure with a contracted capacity of up to 100MW. The study area falls within the Gamagara Local Municipality within the John Taolo Gaetsewe District Municipality. The site is located east of Deben and is accessible via the R380 provincial route which branches off the N14 National Road, approximately 3km south of Kathu. A facility development area, which will include the PV facility, BESS and a 132kV facility substation to be connected via a Loop-in-Loop out (LILLO) connection to the Umtu 132kV overhead power line will be identified within the study area considered in the Scoping phase. The infrastructure associated with this 100MW PV facility includes: PV modules and mounting structures Inverters and transformers Cabling between the panels, to be laid underground where practical. Battery Energy Storage System (BESS) Site and internal access roads (up to 8m wide) Laydown area. Operation and Maintenance buildings including a gate and security building, control centre, offices, warehouse, and workshop areas for maintenance and storage. Grid connection solution including a 132kV facility substation to be connected via a Loop-in-Loop out (LILLO) connection to the Umtu 132kV overhead power line (located ~5km east of the site). The development area will be larger than the area needed for the construction of a 100MW PV facility and will provide the opportunity for the optimal placement of the infrastructure, ensuring avoidance of major identified environmental sensitivities by the development footprint. To avoid areas of potential sensitivity and to ensure that potential detrimental environmental impacts are minimised as far as possible, the development footprint within which the infrastructure of San Solar PV facility and its associated infrastructure will be located will be fully assessed during the EIA Phase. Three (3) solar facilities have been constructed in the broader area. These include the Sishen Solar PV and Kathu Solar PV facilities located immediately west of the farm Remaining extent of the Farm Wincanton 472.

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The Kathu Solar facility is a CSP facility located to the east of the study area

Savannah Environmental has been appointed by San Solar Energy Facility (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed San Solar PV Facility and associated infrastructure, near Kathu, 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 will include the construction of PV Modules and mounting structures, inverters and transformers, cabling between panels (to be laid underground where practical), Battery Energy Storage System (BESS), site and internal access roads, laydown area, operations and maintenance buildings including a gate, security building, control centre, offices, warehouse and workshop areas, 132kV facility substation, 132kV switching station to be connected via a Loop-In-Loop-Out connection to the Fox-Umtu overhead powerline.

It must be noted that this application is linked to SAHRIS Case ID 349 (<https://sahris.sahra.org.za/cases/san-sef-kathu-273>). SAHRA noted no objections to the previously proposed development and provided conditions.

CTS Heritage has been 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).

Lavin, J. 2021. Desktop Heritage Screening Assessment for the Proposed San Solar PV Facility and Associated Infrastructure, Northern Cape Province.

The 2013 HIA identified Stone Age surface scatters of low heritage significance and railway related infrastructure on the outskirts of the development area.

Recommendations provided in the report include the following:

- Should any sink holes or ESA archaeological artefacts be uncovered during the course of excavation activities, work must cease in the area and SAHRA must be contacted regarding a way forward;
- A Chance Fossil Finds Procedure is implemented for the duration of the excavation activities.

In an Interim Comment issued on the 08/04/2022, SAHRA requested that an updated HIA be conducted as part of the EA process for the proposed development as the previous HIA was conducted 9 years ago. The



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assessment must comply with section 38(3) of the NHRA. The Heritage Impact Assessment (HIA) must contain a field-based archaeological component and a desktop Palaeontological Impact Assessment (PIA).

Since the issuing of the Interim Comment, an updated HIA and PIA has been submitted, along with the Final EIA.

Lavin, J. 2022. Heritage Impact Assessment in terms of Section 38(8) of the NHRA for the Proposed development of the San Solar PV Facility and Associated Infrastructure, Northern Cape Province.

The recommendations provided in the report include the following:

- A no-go buffer area of 200m must be implemented around the wetland associated with Sites 004, 005 and 006 to ensure that no indirect impact takes place. This site should also be marked as no-go on all development maps and SDPs;
- The attached Chance Fossil Finds Procedure is implemented for the duration of construction activities. Should any buried archaeological resources or human remains or burials be uncovered during the course of development activities, work must cease in the vicinity of these finds. The South African Heritage Resources Agency (SAHRA) must be contacted immediately in order to determine an appropriate way forward.

The HIA based the above recommendations on results from the following heritage specialist reports:

Bamford, M. 2021. Palaeontological Impact Assessment for the proposed development of the San Solar PV Facility near Kathu in the Northern Cape Province

The proposed development area is underlain by Tertiary Limestones and calcretes that might have preserved fossil plants and bones, however the topography of the area is flat with no exposures of caves or pans so it is unlikely that fossils would be found.

Engelbrecht, J. 2022. Phase 1 Archaeological Impact Assessment: Proposed San Solar Development on Wincanton Farm 472 near Kathu

A total of five heritage resources were identified within the proposed development area. These include an old ruin of Grade III heritage significance, three surface scatter of Middle Stone Age or Early Later Stone Age

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lithics (Sites 005 – 006) of Grade IIIB heritage significance (the HIA has noted these as Grade IIIC), and one ruin of Grade IIIC heritage significance.

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 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. 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/ 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:
 - 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;
- As the Final EIA has been finalised without incorporating comments from SAHRA, this comment must be forwarded directly to the competent authority for their consideration as per section 38(8) of the NHRA. Proof of the delivery and receipt thereof must be provided to SAHRA;

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- 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
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/593911>

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.