

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: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 18576

Date: Monday June 12, 2023
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Final Comment

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

Attention: Savannah Environmental (Pty) Ltd

PO Box 148
Sunninghill
2157

Emoyeni Renewable Energy Farm (Pty) Ltd is proposing the development of renewable energy facilities, collectively known as the Umbbila Emoyeni Renewable Energy Facility, consisting of a commercial wind farm, solar PV facility, and associated grid infrastructure, including a battery energy storage system, located approximately 6km southeast of Bethal in the Mpumalanga Province of South Africa. A preferred project focus area with an extent of 27 819ha been identified by Emoyeni Renewable Energy Farm (Pty) Ltd as a technically suitable area for the development of the Umbbilla Emoyeni Renewable Energy Farm with a contracted capacity of up to 666MW of wind energy and 150MW of solar energy. This layout, and project capacity, will reduce as the EIA and scoping process identifies environmental constraints that exclude areas for development. The wind farm is proposed to accommodate the following infrastructure: Up to 111 wind turbines with a maximum hub height of up to 200m. The tip height of the turbines will be up to 300m. 33kV / 132kV onsite collector substations Battery Energy Storage System (BESS) Cabling between turbines, to be laid underground where practical Laydown and O&M hub (approximately 300m x 300m): Batching plant of 4ha to 7ha Construction compound (temporary) of 6 Ha approximately Operation and Maintenance office of 1.5Ha approximately , Laydown and crane hardstand areas (approximately 75m x 120m) Access roads of 12-13m wide, with 12m at turning circles. It is anticipated that the power generated by the project will be bid into the REIPPPP tender process (DMRE) and/or into private off take opportunities. The LILO corridor will intersect with either the Camden-Zeus 1 400kV, Camden-Zeus 2 400kV or Camden-Tutuka 400kV power line.

Savannah Environmental (Pty) Ltd was appointed by Emoyeni Renewable Energy Farm (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Umbbila Emoyeni Wind Energy Facility, near Bethal, Mpumalanga Province.

In a Final Comment issued on the 18/11/2022, SAHRA noted no objections to the development and provided conditions (<https://sahris.sahra.org.za/node/609093>). The EA was granted for the development on the 26

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January 2023, with an amendment issued on the 15/05/2023. As a condition of the EA (Condition 121), the final layout should be shown to the appointed archaeologist to confirm that all significant heritage resources have been adequately protected. As such a Heritage Walkdown report has been submitted:

Lavin, J and Wiltshire, N. 2023. Archaeological Specialist Study Walkthrough in terms of section 38(8) of the NHRA for Umbila Emoyeni Renewable Energy Wind and Solar PV Facilities, Mpumalanga Province

It is noted that the Walkdown has been conducted for the Phase 1 of the WEF, with only 25 turbines and associated infrastructure assessed during this walkdown.

As part of the walkdown, a total of 19 heritage resources were identified. It is not clear if these resources are newly identified or are the same as the resources identified as part of the HIA. These heritage resources include modern werfs, structures and historical ruins of negligible heritage significance, historical structures of Grade IIIC heritage significance, and three burial grounds of high heritage significance.

Recommendations provided in the report include the following:

- A 50m no-go development buffer is implemented around all burial ground sites;
- A Management Plan for the ongoing conservation of these burials is developed prior to construction, along with a Guide on how to identify marked and unmarked burials and how to proceed should previously unidentified burials be uncovered during the construction process;
- A Chance Finds Procedure is recommended to be implemented.

The Environmental Management Programme (EMPr) for Phase One of the WEF has been submitted including an EMPr for one onsite collector substation, which include a Heritage Conservation Management Plan.

Lavin, J. 2023. Heritage Conservation Management Plan: Umbila Emoyeni Renewable Energy Wind and Solar PV Facilities, Mpumalanga Province.

The CMP contains management and monitoring measures for the protection and management of heritage resources within the development area, noting the different phases of the development i.e. construction, operational and decommissioning phases. The CMP contains a guide on how to identify burials and how to proceed should previously unidentified burials be uncovered.

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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 Development Applications Unit (DAU) has no objections to the final layout of the authorised 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:
- Each Phase of the development must be subjected to a walkdown and the walkdown reports must be submitted to SAHRA for review and comment. No construction of the Phase in question may proceed without comments from SAHRA in this regard;
- 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 DAU (Natasha Higgitt 021 202 8660) 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 DAU (Natasha Higgitt 021 202 8660) 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;
- The Final EMPr per Phase of the development must be submitted to SAHRA for record purposes.

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
Manager: Development Applications Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/597541>
(DFFE, Ref: 14/12/16/3/3/2/2160) (DFFE, Ref: 14/12/16/3/3/2/2160/AM1)

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.