

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: 18578

Date: Friday March 31, 2023
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Interim 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 Umbbilla 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 project will include associated grid infrastructure that is required to connect the Umbbilla Emoyeni Renewable Energy Facility to the national grid. The grid connection solution entails establishing a 400/132 kV MTS, between Camden and SOL Substations, which will be looped in and out of the existing Camden-Sol 400 kV line¹. The location of the MTS will be refined through an ongoing process of communication with Eskom Planning but will be within close proximity to the 400kV line in order to cut into this line.

Savannah Environmental (Pty) Ltd has been appointed by Emoyeni Renewable Energy Farm (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Umbbilla Emoyeni Electrical Grid Infrastructure, near Bethal, Mpumalanga 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 a new 400/132kV main transmission substation (MTS), two 400kV loop-in loop-out powerlines to the existing Camden-Sol 400kV transmission line, on-site switching stations at each renewable energy facility, 132kV powerlines from the switching stations to the new MTS and access roads.



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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. 2022. Desktop Heritage Screening Assessment for the Ummbila Emoyeni Renewable Energy Wind and Solar PV Facilities, Mpumalanga Province.

The desktop study noted that heritage resources such as Stone Age resources, Late Iron Age sites, burial grounds and graves, historical werfs and Anglo-Boer war remains may be located within the proposed development. The proposed development footprint is located in areas of moderate and very high palaeontological sensitivity, underlain by the Vryheid formation.

The report recommends that further field assessment of the impact to heritage including palaeontological resources must be undertaken.

In an Interim Comment issued on the 10/06/2022, SAHRA requested that the pending assessment of the impact to heritage resources comply with section 38(3) of the NHRA as required by section 38(8) of the NHRA and must include an archaeological and palaeontological component. Since the issuing of the Interim Comment, the EA was granted on the 27/01/2023 and uploaded to the SAHRIS application on the 22/02/2023 along with the HIA. No Final EIA or EMPr has been submitted to SAHRA. The EA was granted without taking into consideration any Final Comment issued by SAHRA. SAHRA notes condition 38 of the EA regarding general mitigation measures for heritage resources.

The HIA contained the following recommendations:

- A 500m no development buffer should be implemented on either side of the N17, R35 and R39;
- A 200m no development buffer should be implemented on either side of the secondary routes that run through the development area;
- A 500m no development buffer must be implemented around the identified farm werfs;
- A 50m no-go development buffer is implemented around all burial ground sites including Observations 001, 005, 006, 008, 012 and 013;
- 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;
- Excavations associated with the foundations of the proposed collector substation must be monitored by

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an archaeologist;

- The proposed collector substation must be moved approximately 100m further south, away from the identified burial ground at Observation 005;
- The Chance Fossil Finds Procedure (Appendix 3) must be strictly adhered to for excavations exceeding 1.5m located within the Vryheid Formation as mapped in Figure 4.6;
- Although all possible care has been taken to identify sites of cultural importance during the investigation of the study area, it is always possible that hidden or subsurface sites could be overlooked during the assessment. 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, burials or other categories of heritage resources are found during the proposed development, work must cease in the vicinity of the find and SAHRA must be alerted immediately to determine an appropriate way forward.

Interim Comment

SAHRA notes that the timeframes in order to appeal the granting of the EA have lapsed, however, SAHRA seeks to obtain clarity as to how the EA was granted without the consideration of Final Comment from SAHRA and how the recommendations provided in the HIA have not been included as conditions in the EA.

SAHRA requests that the Final EIA and EMPr be submitted to the case so informed comments may be issued.

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
Manager: Development Applications Unit
South African Heritage Resources Agency

**UMMBILA EMOYENI RENEWABLE ENERGY FACILITIES EGI, MPUMALANGA
PROVINCE**

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ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/597544>
(DFFE, Ref: 14/12/16/3/3/2/2162)