

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: 20237

Date: Monday May 15, 2023
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Interim Comment

In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mr Shaun Macgregor
Ecoleges Environmental Consultants
PO Box 9005
NELSPRUIT
1200

Electricity generated by the project will be “wheeled” on existing Eskom infrastructure for private offtake. The growing demand for the generation and supply of renewable energy by Independent Power Producers (IPPs), has resulted in the expansion of the project scope, which will now require additional authorisations. The increased scope includes: 1. Additional access road upgrades leading to the MTS are required, due to the size and weight of the MTS transformers and associated delivery vehicles as well as ensuring compliance with Eskom minimum road specifications. The required road upgrades will result in “triggering” additional Listed & Specified Activities not currently included in the existing Environmental Authorisation (EA), necessitating application for additional EA by way of a Basic Assessment. 2. Electricity generated by the Solar PV Facility will be connected to the national grid, using Loop-In, Loop-Out (LILO) into the existing 400 kV Eskom transmission powerline closest to the MTS (known as Line 2), but provision needs to be made to allow LILO into Line 1, a parallel Eskom transmission line approximately 2.5 kms away from Line 2. This additional transmission line forms part of the Part 2 Amendment. 3. Due to the size of the MTS, local supply of ready-mix concrete will no longer be feasible, and on-site batching will be required. So, the Part 2 amendment will also include on-site concrete batching, which was not included in the original scope of the project. Furthermore, an additional contractor laydown will be required, as provision needs to be made for multiple contractors during the construction phase, as well as changes to Operational & Maintenance (O&M) facilities, which need to accommodate more than one Independent Power Producer (IPP). 4. Finally, application will be made to consolidate all the current water uses authorised under General Authorisation into an Integrated Water Use License. Additional water uses will be added into the IWULA for road building activities within the DWS regulated area of a watercourse, as well as the provision of additional water, by way of groundwater, to ensure adequate water provision for the road upgrades and on-site concrete batching activities.



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Ecoleges Environmental Consultants have been appointed by Solar Africa Energy (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application for proposed amendments to the approved 300MW PV facility on several properties near Hanover, Northern Cape Province (DFFE Reference: 14/12/16/3/3/2/998).

A draft Motivational Report has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2014 EIA Regulations. The proposed amendments include a second Loop-In-Loop-Out transmission line connection, the relocation of the construction camp and offices, the inclusion of an on-site concrete batching plant at the construction camp or substation, three additional boreholes, re-alignment of 11KV distribution line, inclusion of communication towers, lightning conductors and lighting, changes to the EMP, removal of condition 32 of the EA regarding Heritage site TS05 as it does not occur on the affected property.

Previous SAHRIS Applications are relevant: Case ID 10210

(
<https://sahris.sahra.org.za/cases/construction-solar-pv-system-various-farms-within-registration-district-hanover-emthanjeni>), Case ID 15963 (<https://sahris.sahra.org.za/cases/de-aar-ea-part-2-amendment>) and Case ID 18748 (<https://sahris.sahra.org.za/cases/de-aar-phase-1-second-ea-part-2-amendment>).

A Palaeontological Comment and desktop Heritage report has been submitted for review as part of the amendment application.

Almond, J. E. 2023. Palaeontological Heritage Comment for the Access Road Basic Assessment and Transmission Line Part 2 Amendment for the Sun Central Cluster 1 between De Aar & Hanover, Pixley Ka Seme District Municipality, Northern Cape Province

The specialist states that the proposed amendments are unlikely to cause significant negative impacts on local palaeontological heritage resources. A Chance Finds Procedure is recommended.

Pelser, A. 2023. A Heritage Scoping Report Impact Assessment related to the development of the Sun Central1, 300 MW, Solar PV Facility additional activities on various farm portions between De Aar & Hanover, Emthanjeni Local Municipality, Pixley Ka Seme District Municipality, Northern Cape Province, South Africa

No field assessment was conducted as part of the Amendment application. Sites previously identified were

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discussed (2017 sites: 18 – 21, 36. 2021 sites: 1, 2 8 – 11) however, none will be impacted by the proposed amendments. Heritage resources were identified by representatives of Ecoleges and the heritage specialist noted that these sites would be of low to medium and medium to high heritage significance.

The report concludes that “the likelihood of sites occurring here is fairly high” and “Some sites, features and material were identified during a recent site visit by representatives of Ecoleges, especially close to the Main Access Road section, confirming this conclusion”.

In an Interim Comment issued on the 20/04/2023, SAHRA requested that a field-assessment of the proposed activities be undertaken as part of the EA Application process. The HIA must confirm the location and extent of the sites identified in 2022 by the representatives of Ecoleges and ground truth any areas associated with the proposed amendment activities.

The EAP requested that SAHRA revised the Interim Comment noting that significant work has been done in the area and heritage sites identified in the surrounding areas will be avoided and managed as part of the proposed development as per the submitted Cultural Heritage Management Plan (CHMP).

Interim Comment

SAHRA notes that extensive surveys have been conducted in the surrounding areas as outlined by the aforementioned cases, however, no surveys have been conducted within the proposed LILO routes. Therefore, the impact to heritage resources for this development are still unknown and SAHRA does not have enough information to provide a comprehensive comment.

Therefore, SAHRA reiterates the previous request that a field-assessment of the proposed amendments and associated activities be undertaken as part of the Amendment Application process.

The applicant is advised to follow the process in terms of section 32(1)b of NEMA in order to extend the EA Amendment process to comply with these comments.

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/609824>