

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
P.O. Box 4637 | Cape Town | 8001
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Enquiries: Natasha Higgitt
Tel: 021 202 8660
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CaseID: 20401

Date: Monday October 09, 2023
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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: Ms Leonie Marais
Private
868 Endeman Street Wonderboom South Pretoria

Phase 1 Heritage Impact assessment (HIA) for the proposed Adams Battery Storage System (BESS) Facility and associated infrastructure located in the Northern Cape Province

NCC Environmental Services has been appointed by Enel Green Power South Africa (Pty) Ltd to undertake an Environmental Authorisation (EA) application for the proposed Adams Battery Energy Storage System (BESS) and associated infrastructure, near Hotazel, Northern Cape Province (DFFE Ref: TBC).

A Draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations. The proposed development is located adjacent to the authorised Adams Solar PV Facility (EA Ref: 12/12/20/2567/1). The proposed development will include a BESS, substation, access road, MV and HV cabling (underground or overhead), fencing, temporary laydown area and possible firebreak around the facility.

Leonie Marais Heritage Practitioner has been appointed to provide heritage specialist input into the EA application in terms of section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Marais, L. 2022. Phase 1 Heritage Impact Assessment (HIA) for the proposed Adams Battery Energy Storage System (BESS) and associated infrastructure located in the Northern Cape Province

No heritage resources were identified as part of the assessment. A Chance Finds Procedure is recommended to be implemented.

A letter regarding the impact to palaeontological resources has been submitted.

Marais, L. 2022. Re Possible Paleontological Impact for the Proposed Construction of the Adams Battery Energy Storage System (BESS) Facility and associated infrastructure located in the Northern Cape Province

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The specialist states that an assessment conducted in 2012 by Prof Bruce Rubidge noted that the adjacent Adams PV Facility would not negatively affect palaeontological heritage and recommended that a Fossil Finds Procedure be implemented.

In an Interim Comment issued on the 26/05/2023, SAHRA requested that a statement must be provided by a qualified palaeontologist with regards to the submitted letter regarding the impact to palaeontological resources of the current proposed development. Since the issuing of the Interim Comment, a Palaeontological Desktop Assessment has been submitted for review (24/08/2023).

Butler, E. 2023. Palaeontological Desktop Assessment: Proposed Development of the Adams Battery Energy Storage System (BESS) and Associated Infrastructure, Northern Cape

The proposed development is underlain by the Griqualand West Basin rocks and Kalahari Group deposits. Stromatolites and more recent fossils remains may be present. A Chance Fossil Finds Procedure should be implemented.

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 BAR and EMPr:

- 38(4)a – The SAHRA Development Applications Unit (DAU) 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 DAU (Natasha Higgitt 021 202 8660 / nhiggitt@sahra.org.za) must be alerted as per section 35(3) of the NHRA. Non-compliance with this 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 / nhiggitt@sahra.org.za) must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with this section of the NHRA is an offense in terms of section 51(1)e of the NHRA

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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:
- 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 BAR 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

Natasha Higgitt
Manager: Development Applications Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/611473>

Terms & Conditions:

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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.