

Our Ref:



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: 21035 Date: Tuesday July 11, 2023 Page No: 1

Final Comment

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

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

THE UPGRADING & DEVELOPMENT OF AN ACCESS ROAD FROM THE N10/'BURGERVILLE' DISTRICT ROAD (2448) TURN-OFF INTO THE FARM RIET FOUNTAIN NO. 39C AND TO THE SWITCHING STATION AND MAIN TRANSMISSION SUBSTATION ON SUN CENTRAL CLUSTER 1 (300 MW) SOLAR PV FACILITY BETWEEN DE AAR & HANOVER, EMTHANJENI LOCAL MUNICIPALITY, PIXLEY KA SEME DISTRICT MUNICIPALITY, NORTHERN CAPE PROVINCE, SOUTH AFRICA.

Ecoleges Environmental Consultants have been appointed by SolarAfrica Energy (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed upgrade and development of an access roads for the Sun Central Cluster Solar PV Facility between De Aar and Hanover, Northern Cape Province.

A draft Basic Assessment Report (DBAR) 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 upgrade of the existing public Burgerville District Road with several potential watercourses and culvert crossing to be affected or existing private farm tracks (to be widened) and a new road to the Switching Station and Main Transmission Substation (MTS).

Natura Viva CC and APelser Archaeological Consulting was appointed to provide heritage specialist input into the EA process 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).

Almond, J. E. 2023. Palaeontological Heritage Comment: 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



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The proposed development area is underlain by the Lower Beaufort Group and Late Caenozic alluvium. It is unlikely that the proposed development will impact on palaeontological heritage. A Chance Finds Procedure is recommended to be implemented.

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

A desktop assessment was conducted for the proposed development, and that several field assessments have been undertaken over the area during 2017, 2021 and 2022. It is noted that heritage resources are located in close proximity to the proposed development area, such as scatters of Middle Stone Age lithics, stone walled features associated with the Anglo-Boer War and other stone walled features of medium heritage significance, open area surface scatters of Middle Stone Age and Later Stone Age sites, a stone walled enclosure site and possible engraving sites of medium to high heritage significance.

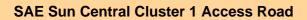
Heritage resources were identified by representatives of Ecoleges and the heritage specialist noted that these sites would be of low to medium and medium to high heritage significance.

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 05/05/2023, 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). SAHRA additionally notes that the majority of the Access Road is proposed along existing road routes and disturbed areas.

In a Final Comment issued on the 15/05/2023, SAHRA noted no objections to the proposed development and provided conditions. One of the conditions included a walkdown of un-developed and un-disturbed sections of



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the proposed road be conducted. The walkdown report has since been submitted (12/06/2023).

Pelser, A. 2023. A Heritage Scoping Impact Assessment Report related to the development of the Sun Central 1,300 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

A total of 22 heritage resources were identified in close proximity to the proposed road, however, none will be directly impacted. These resources include surface scatters of Stone Age lithics of low heritage significance, and historical features and farmstead of medium heritage significance.

Recommendations provided in the report include the following:

- Sites 002-005, 008-010 and 016 care should be taken to avoid these sites if the road is widened or tarred. A bufferzone is recommended;
- It is furthermore recommended that the cultural heritage sites recorded during the May 2023 field-based assessment be included in the already existing CHMP that has been submitted for the Solar PV Project;
- A Chance Finds Procedure is recommended.

Final Comment

SAHRA is satisfied with the submitted walkdown report and the mitigation measures provided by the heritage specialist. The following conditions must also be adhered to:

- A bufferzone of 10 m around site 002-005, 008-010 and 016 must be maintained at all times during the development;
- The CHMP must be updated to reflect the results of the walkdown;
- All previous conditions, with the exception of the walkdown condition, provided in the Final Comment issued on 15/05/2023 remain valid and must be adhered to.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

SAE Sun Central Cluster 1 Access Road

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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/615926

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.