

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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Enquiries: Natasha Higgitt
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CaseID: 21042

Date: Wednesday May 10, 2023
Page No: 1

Interim Comment

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

Attention: Savannah Environmental (Pty) Ltd

PO Box 148
Sunninghill
2157

The Applicant, Kotulo Tsatsi Energy (Pty) Ltd, is proposing the construction of a photovoltaic (PV) solar energy facility (known as the Kotulo Tsatsi Energy PV3) located on a site located approximately 70km south-west of the town of Kenhardt and 60km north east of Brandvlei in the Northern Cape Province. The solar energy facility will comprise several arrays of PV panels and associated infrastructure and will have a contracted capacity of up to 200MW. The facility will be located within the farm Portion 2 of Farm Styns Vley 280. The PV facility is planned to be located adjacent to the authorised 100MW Kotulo Tsatsi PV2 facility, and within an area previously authorised for CSP project infrastructure. The project site 1 falls under the Hantam Local Municipality which is part of Namakwa District Municipality. The site is accessible via an existing gravel farm road (known as Soafskolk Road) which provides access to the farm off of the R27 which is located east of the project site.

Savannah Environmental was appointed by Kotulo Tsatsi Energy (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Kotulo Tsatsi Energy PV 3 Facility, near Brandvlei, Northern Cape Province (DFFE Ref: 14/12/16/3/3/2/2223).

A draft Environmental Impact Assessment Report has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. It must be noted that SAHRA was not consulted during the Scoping Phase of the application. The proposed development will include the construction of a solar PV array, cabling between the project components, access and internal roads, two substations and BESS hubs, 132 kV power line, operation and maintenance buildings and lay down area within a development footprint of 1350 ha.

CTS Heritage 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).

Lavin, J. 2023. Heritage Impact Assessment in terms of section 38(8) of the NHRA for the proposed

PROPOSED DEVELOPMENT OF KOTULO TSATSI ENERGY PV 3 NEAR KENHARDT, NORTHERN CAPE

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development of Kotulo Tsatsi Energy PV 3 near Kenhardt, Northern Cape

The HIA draws on results of specialist reports (Lavin, 2021 and Almond, 2015). The proposed development area is underlain by deeply weathered and calcretised bedrocks of the Dwyka and Ecca Groups. Two palaeontological sites are present in the proposed development area i.e. 90934 and 90935 rated as sites of Grade IIIC heritage significance, and no mitigation recommendations are provided.

The heritage survey conducted in 2021 was limited, as the development layout was not yet known. A total of 11 heritage resources were identified within the development footprint. These include Stone Age lithics and historical artefacts of negligible heritage significance.

Recommendations provided in the report include the following:

- All excavation activities are subject to the Paleontological Chance Finds Procedure;
- A Chance Finds Procedure is recommended to be implemented.

Interim Comment

SAHRA requests that a letter be provided by a palaeontologist, confirming if the results of the 2015 PIA are still relevant for the current development 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

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ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/615978>