

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: 21084

Date: Thursday May 18, 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: Mooi Plaats Solar Power (Pty) Ltd

BASIC ASSESSMENT FOR THE PROPOSED CONSTRUCTION AND OPERATION OF ACCESS ROADS, 33KV POWERLINES AND A 132KV POWERLINE LOCATED NEAR NOUPOORT IN THE UMSOBOMVU LOCAL MUNICIPALITY, IN THE NORTHERN CAPE PROVINCE

SLR Consulting (Pty) Ltd has been appointed by Mooi Plaats (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed 33kV, 132kV Powerline and Access Roads near Noupoort, 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 construction of overhead powerlines (two 33kV powerlines, approximately 2.3 km and 1.7 km long, and one 132kV powerline 11.3 km long) and three internal access roads (approximately 1.3 km, 1.2 km and 0.09 km long).

PGS Heritage (Pty) Ltd have been appointed to provide heritage specialist input into the EA process 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).

Mann, N. 2023. Proposed Construction of a 132 kV Overhead Line, 33 kV above ground cables and Internal Access Roads for the Authorised Mooi Plaats Solar Energy Facility (SEF) and its associated infrastructure, near Noupoort in the Northern Cape Province

A total of four heritage resources were identified. These include three stone packed structures and one concrete structure of low heritage significance.

Recommendations provided in the report include the following:

- The site (MP-3) is located further than 100m away of the proposed 132kV OHL, therefore no mitigation is required. In terms of general conservation of the site, a 100m no-go buffer zone is recommended. If



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development occurs within 100m of the structures, the buildings will need to be satisfactorily studied and recorded before impact occurs. Recording of the structures i.e. (a) map indicating the position and footprint of the structures (b) photographic recording of the structures (c) measured drawings of the floor plans of the principal buildings;

- Implement a chance to find procedures in case where possible heritage finds are uncovered;
- A detailed “walk down” of the final approved powerline alignments and access roads will be required before construction commences;
- It should be noted that at the time of the survey, the access road alignment had not been supplied. Although the road alignment already falls within the previously authorised footprint for the Mooi Plaats SEF, it is still recommended that the roads are assessed during the walkdown before construction commences;
- Any significant features of significance identified during this walkdown will require formal mitigation (i.e., permitting where required) or where possible a slight change in design could accommodate such resources;
- A Heritage Management plan (HMP) for heritage resources needs to be compiled and approved for implementation during construction and operations where heritage features of significance are identified.

In an Interim Comment issued on the 15/05/2023, SAHRA requested that a field-based PIA be submitted as part of the application, and the HIA be finalised. Since the issuing of the Interim Comment, a PIA and final HIA have been submitted for review (16/05/2023).

Butler, E. 2023. Proposed construction of a 132 kV above ground cable and internal access roads for the authorised Mooi Plaats Solar Energy Facility (SEF) and its associated infrastructure, near Noupoort in the Northern Cape Province. Palaeontological Impact Assessment

The proposed development footprint is underlain by the Karoo Dolerite Suite, sandstones and shales of the Adelaide and Tarkastad subgroups, and are overlain by Cenozoic superficial alluvium. Only one loose fragment with plant stems of low heritage significance was identified within the proposed development footprint.

Recommendations provided as part of the report include the following:

- The ECO for this project must be informed that the Adelaide Subgroup and Tarkastad Subgroups,

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- (Beaufort Group, Karoo Supergroup) has a Very High Palaeontological Sensitivity;
- A Chance Finds Protocol should be implemented as part of the EMPr.

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 has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development:
- A pre-construction archaeological survey of the finalised layout must be conducted by a qualified archaeologist prior to construction. A report detailing the results of the survey must be submitted to SAHRA for comment. No construction may commence without comments from SAHRA in this regard;
- SAHRA reserves the right to stipulate additional conditions, layout changes or object to the development based on the results of the preconstruction survey;
- The recommended HMP must be submitted to SAHRA prior to construction for approval. No construction may commence without approval from SAHRA in this regard;
- 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 (Natasha Higgitt 021 202 8660) must be alerted as per section 35(3) of the NHRA. Non-compliance with 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 Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Ngqabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with 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)d – See section 51 of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
- With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above;
- If heritage resources are uncovered during the course of the development, a professional archaeologist

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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/616252>
(DENC, Ref: NC/BA/09/PIX/UMS/NOU1/2023)

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.