



an agency of the
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: 21258

Date: Monday September 11, 2023
Page No: 1

Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Londolozi Game Reserve (Pty) Ltd.

Londolozi (Pty) Ltd. intend to apply for environmental authorisation for the development of a 1MW solar array located in close proximity to its current operational footprint on the property Marthly Farm 258KU within the Londolozi Game Reserve, which is within the Sabi Sands Game Reserve in the Mpumalanga Province. The solar array will cover an area of 1ha and will be surrounded by constructed vegetated berms to hide the solar array and which will increase the development footprint to approximately 1.5ha. In addition to this will be the transmission infrastructure that will link the new solar array to the existing power grid on the property. There are three alternative sites that will be assessed for their suitability and the locality of these is indicated in the Background Information Document that has been uploaded. Earth works will be required to level the site and to provide material for the construction of the berms. These earth works will be equal to the 1ha extent of the solar array or less, depending on the exact topography of the preferred site. Vegetation from the site will be used to vegetate the berms.

Zunckel Ecological and Environmental Services has been appointed by Londolozi Game Reserve (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed 1MW solar array on Sparta Farms 259KU, within the Sabi Sands Game Reserve, Mpumalanga Province.

A draft Basic Assessment Report (DBAR) was submitted in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA) and the NEMA EIA Regulations (As amended). The proposed development will include solar panels, berms, and connections to the main back of house area within a development area of 1 ha.

Annie van Deventer-Radford has been appointed to provide heritage specialist input as part of 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).

Van Deventer-Radford, A. 2023. Letter Of Motivation for the Exemption of Heritage Impact Assessment for the Proposed Solar Upgrade, Londolozi Game Reserve (Sparta Farms 259KU), Ehlanzeni District Municipality (DC32) and the Bushbuckridge Local Municipality (MP325) - SAHRIS Case ID - 21258



an agency of the
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: 21258

Date: Monday September 11, 2023
Page No: 2

The specialist concludes that due to previous surveys in the area and the disturbed nature of Option A, the proposed development will not impact on heritage resources and no further assessments are required. A Chance Finds Procedure is recommended to 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 offence 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 offence 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 for 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

Our Ref:



an agency of the
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: 21258

Date: Monday September 11, 2023
Page No: 3

above in the case header.

Yours faithfully

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

ADMIN:

Direct URL to case: <https://sahr.is.sahra.org.za/node/617020>
(DARDLEA, Ref:)

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.