

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 22169

Date: Thursday October 26, 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: Padloper PV (Pty) Ltd

### **Proposed development of a 132 kV Overhead Power Line and associated Electrical Grid Infrastructure between the proposed Padloper PV 4 and the proposed authorised Ishwati Emoyeni Collector Substation (i.e., Padloper EGI 4), near Murraysburg in the Northern Cape and Western Cape Provinces**

The CSIR has been appointed by African Clean Energy Developments (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed 132kV Overhead Powerline between the Padloper PV 4 (EGI 4) and the proposed authorised Ishwati Emoyeni Collector Substation, near Murraysburg in the Northern Cape and Western Cape Provinces.

It must be noted that SAHRA does not have jurisdiction to provide comments for development applications in the Western Cape Province. This comment will only discuss the Northern Cape portion of the proposed development application.

A draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The DBAR is a combined report for two EA applications. Only the EGI 4 development will be discussed in this comment. The proposed development will entail the construction of a 132kv powerline with steel monopoles or lattice towers of approximately 36.5 km, with a registered servitude of up to 50 m wide, service roads, and switching station.

Banzai Environmental (Pty) Ltd and ASHA Consulting (Pty) Ltd have been appointed to provide heritage specialist input as part of the EIA process as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Butler, E. 2023. Palaeontological Impact Assessment: Proposed Padloper (Projects 1, 2, 3 And 4) Solar Photovoltaic (PV) Facilities and the Associated 132 kV Overhead Power Lines and Associated Infrastructure near Murraysburg, Western Cape and Northern Cape Provinces*

\*Only the results of EGI 4 will be discussed in this comment.



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The proposed development area is underlain by the Balfour and Middelton Formation, Jurassic Dolerite and Quaternary alluvium. No fossils were identified as part of the site survey. A Chance Finds Protocol is recommended to be implemented and is provided in the report.

*Orton, J. 2023. Heritage Impact Assessment: Basic Assessment for the proposed development of a 132 kV overhead power line and associated infrastructure between the proposed Padloper Solar 4 and the proposed authorised Ishwati Emoyeni Collector Substation (I.E., Padloper Egi 4), near Murraysburg, Murraysburg Magisterial District, Western Cape, and Richmond Magisterial District, Northern Cape*

Only one heritage resource was identified within the Northern Cape portion of the development, a stone wall of low heritage significance (Site 016). Sites 005, 179 and 180 are located outside of the powerline route and will not be impacted. The cultural landscape is assessed to have a medium heritage significance at a local level and the visual impact will be a low negative after mitigation measures have been implemented.

Recommendations provided in the report include the following:

- A pre-construction archaeological survey must determine whether any further impacts might occur;
- Any further no-go areas must be flagged on site prior to development starting;
- No stones may be removed from any archaeological site;
- Lighting mitigation must be employed at the switching station to ensure that light is directed only to where it is needed and, preferably, that it only switches on when needed;
- Buildings to be painted in earthy tones where technically feasible; and
- A Chance Finds Procedure is recommended to be implemented.

## Final Comment

\*This comment is only valid for the Northern Cape portion of the development.

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 EMP:

- 38(4)a – The SAHRA Development Applications Unit (DAU) has no objections to the proposed development;



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- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
- An addendum to the HIA must be submitted, provide site recordings of sites 005, 179 and 180 identified within the Northern Cape section;
- A pre-construction survey report must be submitted to SAHRA for the Northern Cape section of the development. SAHRA reserves the right to impose additional conditions on the development based on the results of the pre-construction survey;
- 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](mailto: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](mailto: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 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

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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/623657>  
(DFFE, 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.