

Our Ref: 9/2/048/0001



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: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 5750

Date: Tuesday October 20, 2020
Page No: 1

Final Comment

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

Attention: Mr Neels Kruger
Neels Kruger

ARCHAEOLOGICAL IMPACT ASSESSMENT (AIA) OF A DEMARCATED SURFACE PORTION ON THE FARM AVONDALE 410 FOR THE PROPOSED AVONDALE 1 PHOTOVOLTAIC POWER PLANT & 132KV POWER LINES DEVELOPMENT, //KHARA HAIS LOCAL MUNICIPALITY, ZF MGCAWU DISTRICT MUNICIPALITY, NORTHERN CAPE PROVINCE

AGES Limpopo (Pty) Ltd had been appointed by Tita Energy (Pty) Ltd to undertake an Environmental Authorisation (EA) Application for the then proposed Renewable Energy Generation Project on the farm Avondale No. 410, Gordonia RD, Northern Cape Province (14/12/16/3/3/2/618).

An Interim Comment had been previously issued for this case on 17/06/2014 requesting clarification on Avondale 2 Solar Facility and the powerlines. It must be noted that SAHRA had no objections to the Avondale 1 Solar Facility and provided conditions. It must also be noted that SAHRA stated that no further assessment of the impact to palaeontological heritage was required.

Since the issuing of the Interim Comment, a letter has been submitted to the SAHRIS Case explaining that the powerlines that were originally part of the scope of work in Case ID 5752 were assessed as part of a revised HIA which was uploaded to the SAHRIS Case in 2015, however SAHRA had not provided a comment. The applicant has requested that SAHRA consider this information in order to provide a Final Comment for environmental compliance as part of the Risk Mitigation Independent Power Producers Procurement Programme (RMIPPPP).

Kruger, N. May 2014. Archaeological Impact Assessment (AIA) of a demarcated surface portion on the Farm Shirley 367 for the Proposed Shirley Photovoltaic Power Plant Development, Gamagara Local Municipality, John Taolo Gaetsewe District Municipality, Northern Cape Province.

Only results pertaining to the powerline will be discussed below:

No heritage resources were identified within the proposed powerline footprint. A Chance Finds Procedure was

Our Ref: 9/2/048/0001



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: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 5750

Date: Tuesday October 20, 2020
Page No: 2

recommended to be implemented.

Final Comment

SAHRA notes that the revised HIA that assessed the powerlines as part of the EA was uploaded on the 31/08/2015 according to the revisions log of the application. Due to a staff changeover, the case was not processed, and no comments were provided by SAHRA. Additionally, it is noted that the EIA and EA application focused only on the Avondale 1 Facility, with Avondale 2 being removed from the scope of work.

As the NEMA EA application process is long since concluded, SAHRA cannot enforce additional conditions on the development in terms of the EMPr. SAHRA can note that the specialists results and recommendations are supported.

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that the following be taken into consideration as part of the EMPr for the authorised Avondale PV Plant and Powerline as per section 38(4) of the NHRA:

- 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 APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) 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/Mimi Seetelo 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(1) of the NHRA;
- 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.

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

Our Ref: 9/2/048/0001



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: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 5750

Date: Tuesday October 20, 2020
Page No: 3

above in the case header.

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/165291>

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.