



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: 8759

Date: Tuesday August 02, 2016
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Final Comment

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

Attention: Paulputs CSP (RF) (Pty) Ltd

Project Name: Paulputs CSP Project Applicant: Paulputs CSP RF (Pty) Ltd. Proposed Activity and Location: The development of a 200MW Concentrated Solar Power (CSP) Project and associated infrastructure on Portion 4 of the Farm Scuitklip 92 located ~45km north-east of Pofadder within the Khai-Ma Local Municipality in the Northern Cape.

Savannah Environmental (Pty) Ltd has been appointed by Paulputs CSP RF (Pty) Ltd to conduct an Environmental Impact Assessment (EIA) process in support of an Environmental Authorisation Application for the proposed Paulputs CSP Project, near Pofadder, Northern Cape Province. A draft EIA was conducted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations, 2014. The proposed Komsberg West project will consist of a field of heliostats and central receiver and will be constructed over an area of approximately 900 ha. Associated infrastructure will include a molten salt tower, power island, cabling linking the power block to the on-site substation, water supply abstraction point with filter and booster station, on-site lined ground water storage reservoir, lined evaporation ponds, water treatment plant and associated chemical store, auxiliary wet cooled chiller plant, control room and office building, workshop, access roads and overhead powerline.

During the EIA review period (04 May 2016-03 June 2016), Savannah received comments from the Department of Environmental Affairs (DEA). To meet the requirements stipulated in the received comments, a revised EIA has been completed.

The comments and subsequent changes to the proposed project did not result in a significant change to the project design or layout, but required the cumulative impact of the surrounding projects to be taken into account when assessing the impact of the proposed development. Other comments issued by the DEA do not have a bearing on heritage resources and are not discussed further.

David Morris from the McGregor Museum was appointed to conduct the Archaeological Impact Assessment (AIA) for the revised EIA.

Morris, 2016. Archeological Impact Report for Paulputs CSP



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As part of the revised AIA, a total of 22 Stone Age and Colonial era artefact surface scatters were identified within the project boundary. These scatters were recorded near the rocky outcrops and low hills, with very little heritage resources found in the sandy plains. Of these 22 sites, two were isolated Early Stone Age (ESA) hand axes, one comprised Middle Stone Age (MSA) flakes, and three were colonial era sites. The remaining sites were of the Later Stone Age (LSA) period including artefacts such as stone lithics, ostrich eggshell fragments and a grinding area. Sites 7-10 and 13 were given a rating of medium significance, while the remaining sites were rated as low significance. The previously identified grave sites (Sites 23-25) have been confirmed to be memorials only, but remain highly significant. It must be noted that a track log of the area surveyed was not supplied.

Recommendations provided in the AIA report include the following:

- The memorials must be avoided with a bufferzone of 10 m. Should this not be possible, the memorials can be relocated following consultation with the affected families;
- The rocky outcrops that occur at the north eastern side of the proposed project footprint should be avoided with a 60 m buffer;
- Provisions for on-going heritage monitoring in a facility environmental management plan which also provides guidelines on what to do in the event of any major heritage feature being encountered during any phase of the development or operation;
- Inclusion of further heritage impact considerations in any future extension of infrastructural elements;
- Immediate reporting to relevant heritage authorities of any heritage feature discovered during any phase of development or operation of the facility; and
- Officials from the relevant heritage authorities (National and Provincial) to be permitted to inspect the operation at any time in relation to the heritage component of the management plan.

Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit accepts the submitted AIA and promotes the recommendations included in the report. The recommendations in the AIA and the following additional conditions must be included in the Final EIA and Environmental Management Programme (EMPr):

- 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/John Gribble 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Itumeleng Masiteng/Mimi Seetelo 012

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320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required.

- The final EIA and appendices must be submitted to SAHRA upon submission to DEA. Should the project be granted Environmental Authorisation, SAHRA must be notified and all relevant documents submitted to the case file.

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
Heritage Officer
South African Heritage Resources Agency

John Gribble
Manager: Maritime and Underwater Cultural Heritage Unit / Acting Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/344252>
(DEA, Ref: 14/12/16/3/3/2/87)

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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.