



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: Elijah Dumisani Katsetse

Tel: 0214624502

Email: ekatsetse@sahra.org.za

CaseID: 18089

Date: Thursday October 13, 2022

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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: Cape Environmental Assessment Practitioners

PO Box 2070
George
6530

Verbena PV Facility, North West Province

Cape Environmental Assessment Practitioners (Cape EAPrac) has been appointed by Verbena PV (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Verbena PV facility on Portions 2, 3, and 4 of the Farm Houthaalboomen 31, Ditsobotla Local Municipality, Dr. Ngaka Modori Molema District Municipality, North West Province.

A draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations, 2014. The proposed development will include PV facility with associated infrastructure such as BESS, auxiliary buildings, onsite substation, inverter stations, and internal roads over an estimated area of 220ha.

Beyond Heritage and Prof. Marion Bamford 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).

van der Walt, J. May 2022. Heritage Impact Assessment for the Verbena PV on Portions 2, 3 and 4 of the Farm Houthaalboomen 31, North West Province.

It should be noted that two additional 120MW PV facilities (Euphoria and Hillardia PV) are concurrently being considered on the project site (within Portion 2, Portion 3, and Portion 4 of the Farm Houthaalboomen 31) and are assessed through separate EIA processes. The specialist undertook both a desktop and field survey of the project area for the Verbena PV project. Site observation indicate that the study area is characterised by agricultural activities including limited cultivation from the 1970s and is currently used for grazing. Heritage finds were limited to widespread low-density Stone Age scatters mostly dating to the MSA with few formal tools and considered as background scatter (Orton 2016) that is of low significance. Higher density Stone Age



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scatters were recorded around **HB015** and **HB015/4** mostly along existing roads that will be used for access to the PV Facility (Alternative 1,2 and 3). Artefacts within the existing roads are out of context and all three alternatives are acceptable from a heritage point of view. Accordingly, the impact to heritage resources is low and project can commence provided that the recommendations in this report are adhered to based on the SAHRA's approval.

The following is recommended:

- Implementation of a Chance Find Procedure for the project,
- Monitoring of the project area by the ECO,
- It is recommended that a surface sample of lithics (at the higher density scatter around **HB 015**) should be analysed and test excavations to determine the depth of deposit prior to construction (as part of the recommended mitigation for Euphoria PV).

Bamford, M. February 2022. Site Visit Report (Phase 2): Palaeontological Impact Assessment for the Proposed Houthaalboomen North Energy Cluster, Lichtenburg, North West province.

The proposed development lies on the potentially very highly fossiliferous rocks of the Malmani Subgroup, (Chuniespoort Group, Transvaal Supergroup), particularly Oak tree Formation. The site visit and walkthrough by the archaeologists for this project found that there were good exposures of dolomite but no stromatolites were present. Nonetheless, a Fossil Chance Find Protocol should be added to the EMP. Based on this information it is recommended that no further palaeontological impact assessment is required unless fossils are found by the developer/environmental officer/other designated responsible person once excavations/drilling activities have commenced. As far as palaeontology is concerned, the project should be authorised.

In an Interim Comment issued on 06/10/2022 (<https://sahris.sahra.org.za/node/606333>), the SAHRA's APM Unit acknowledged receipt of the DSR and submitted specialist reports and recommendations contained therein and stated that further comments will be issued upon submission of a draft EIA with appendices. Since the issuing of the Interim Comment the draft EIA has been submitted to the case.

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

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Final EIA and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit 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 section 35(4) permit must be obtained from SAHRA to mitigate Site **HB 015** prior to construction.
- 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 (Elijah Katsetse/Phillip Hine 021 462 4502) 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/Ngqalabutho 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(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) 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 EIA 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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Elijah Dumisani Katsetse
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: <https://sahr.is.sahra.org.za/node/593623>

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.