

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 19004

Date: Friday July 29, 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: Savannah Environmental (Pty) Ltd

PO Box 148
Sunninghill
2157

The proposed development of the Vaal River Solar PV Facilities, consisting of 3 PV Facilities developments and associated grid and powerline infrastructure, received Environmental Authorisation (EA) for a site near Orkney in the North West Province (see the table below) on 27 June 2012. The Environmental Authorisation for the Vaal River Solar PV Facility projects lapses on 10 October 2022. In this regard a Part 1 Amendment Application is being undertaken to extend the validity of the Environmental Authorisation. The Applicant is requesting the following Amendments for the PV: To amend the authorised solar PV capacity with no adjustment to the PV panel height and development footprint of the facility from that as authorised. Inclusion of BESS into the project description. An extension of the validity of the Environmental Authorisation. The Applicant is requesting the following Amendments for the grid connection: An extension of the validity of the Environmental Authorisation.

Savannah Environmental has been appointed by the Vaal River Solar 2 (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application for the extension of the Authorised Kabi Vaalkop PV 2513 (now Vaal River Solar 1, 2, & 3 PV Facilities) issued in 2012 for a further 10 year period on Portion 3 of the Farm Vaalkop and Portion 200 of the Farm Noitggedacht near Orkney, City of Matlosana Local Municipality, Dr. Kenneth Kaunda District Municipality, North West Province.

A Verification and Motivation Report (VMR) 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 scope of work entails a part one amendment application which includes a request to amend the authorised Solar PV capacity with no adjustment to the PV panel height and the development footprint of the facility from that as authorised, an extension of the validity of the Environmental Authorisation, and amendment for the grid connection as follows, inclusion of a Battery Energy Solar System (BESS) into the project description.

This application relates to the Kabi Vaalkop PV 2513 (<https://sahris.sahra.org.za/cases/kabi-vaalkop-pv-2513>).



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In 2012 Coetze, F.P. and Prof. M Bamford were 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).

Coetzee, FP. April 2012. *Cultural Heritage Survey of the Proposed Kabi Vaalkop PV Facility near Orkney, Dr Kenneth Kaunda District, North West Province.*

The archaeologist conducted a background study and a site visit. The background study revealed that archaeological traces from the Early, Middle and Later Stone Age might be expected, as well as from the Early and Late Iron Age. Historically, the nearby town of Klerksdorp was settled in 1837. Several important battles were fought in the area during the South African War and four blockhouse lines converge on the area. Gold mining has taken place in the area since 1885. The site visit did not identify any Stone Age, Iron Age or Colonial Period remains and located no graves. The foundations of two square brick and cement structures (5m x 5m and 5m x 8m) were identified, but these were deemed to be less than 60 years old.

Bamford, M. May 2012. *Palaeontological Impact Assessment for Kabi Vaalkop Solar PV Facility.*

The palaeontological assessment showed that the area is located within the Malmani Subgroup of the Chuniesport Group (Transvaal Sequence), represented by dolomites and cherts that are too old to contain fossils, beyond possible unicellular algal tracefossils in the dolomite.

A Letter of Exemption has been submitted by CTS Heritage for the EA amendment process 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).

Levin, J. June 2022. *Letter of Exemption: The Extension of Validity to the EA: Vall River Solar 1, 2, 3, and 4 PV Facilities and Grid Connection Infrastructure (as amended) on a Site Near Orkney, North West Province (previously called the proposed Vaalkop Solar PV Facility).*

The specialist undertook both a desktop and field assessment of the large and project area. A site verification field inspection was undertaken by Dr. Presnyakova in June 2022 to determine if the landscape has been subject to any changes that may impact the findings outlined in Coetzee (2012), such as the exposure of new sensitive subsurface sediments/deposits that were not visible during the original survey. Dr. Presnyakova determined that no archaeologically relevant changes are evident based on the verification survey that was

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undertaken, and that it is unlikely that previously unidentified heritage resources will now be evident within the area proposed for development. The track path and site photographs resulting from this site verification are included as figure 1 to 12. The submitted letter makes the same conclusion for palaeontological heritage and argue that the overall palaeontological sensitivity of the development area as assessed by Bamford (2012) remains applicable. And a Chance Fossil Find Protocol is recommended for inclusion in the EMP.

In light of the above, there is no heritage objection to granting the extension to the validity to develop the Vaal River Solar PV Project 1, 2, 3, and 4 based on the current site conditions on the condition that the relevant recommendations in the previous heritage assessments concluded are implemented, including a walkdown assessment of the final layout and that the attached Chance Fossil Finds Procedure (Appendix 1) is added to the EMP.

Final Comment

The SAHRA's APM Unit has received the Verification and Motivation Report (VMR) as part of the Environmental Authorisation Amendment process, attached to the VMR is a Letter of Exemption for heritage specialist studies. SAHRA supports the recommendations made in the Letter by the specialist and has no objections to the project.

SAHRA inserts the following comments 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 VMR and EMP:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed expansion;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development;
- Both an Archaeological and Palaeontological walkdowns must be undertaken for the final layout prior to construction. A report on the outcomes of the walkdown must be submitted to SAHRA for comment, construction may not commence without feedback from SAHRA on the report.
- 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

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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 VMR 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.

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

Yours faithfully

Elijah Dumisani Katsetse
Heritage Officer
South African Heritage Resources Agency

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Phillip Hine

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/600585>

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.