

Our Ref:



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: Sityhilelo Ngcatsha
Tel: 0212028663
Email: sngcatsha@sahra.org.za
CaseID: 16676

Date: Thursday October 28, 2021
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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: Reuben Maroga
SLR Consulting (South Africa) (Pty) Ltd

APPLICATION FOR ENVIRONMENTAL AUTHORISATION FOR THE PROPOSED ESTABLISHMENT OF THE DAMLAAGTE SOLAR PV FACILITY AND ASSOCIATED GRID CONNECTION INFRASTRUCTURE IN THE FREE STATE PROVINCE.

SLR Consulting (South Africa) (Pty) Ltd has been appointed by the South Africa Mainstream Renewable Power Developments (Pty) Ltd to undertake the Environmental Authorisation (EA) Application for the development of the Damlaagte Solar PV Facility including a Battery Energy Storage System (BESS) and associated infrastructure on the remaining extent of the Farm Damlaagte 229, located 19 km west of the town Sasolburg, Free State Province.

A Scoping Report has been submitted in terms of the National Environmental Management Act, 1998 (No. 107 of 1998) (NEMA) (as amended) and the NEMA EIA Regulations. The development footprint is 166 ha in extent and the infrastructure includes a PV panel array, mounting structures, inverters, substation, Battery Energy Storage and access roads along with Operations and Maintenance Buildings.

The study area has been impacted by agricultural activities no structures or archaeological sites of significance were identified during field survey. No paleochannels or rivers were noted within the study area and there is a well-documented history within the surrounding area of historical mining activities. The possibility of locating fossils within the study area is deemed to be low. The site is deemed to be of a low heritage sensitivity, however, a Heritage Impact Assessment (HIA) (including palaeontological study) of the project will be undertaken during the impact assessment phase.

An interim comment was issued by SAHRA on the 07/07/2021 which noted that the Heritage Impact Assessment (HIA) inclusive of the Archaeological Impact Assessment (AIA) and the Palaeontological Impact Assessment (PIA), would be undertaken during the impact Assessment phase and submitted to SAHRA for commenting. The HIA and PIA along with the Draft Environmental Impact Assessment were submitted to the case on SAHRIS on the 27/09/2021.

HCAC Heritage Consultants and Prof Marion Bamford were appointed to provide heritage specialist input as

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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).

Bamford, M. 2021, Palaeontological Impact Assessment for the proposed Scafell Cluster Project, Free State Province: Desktop Study (Phase 1).

The study area is underlain by the unfossiliferous Klipriviersberg Group which comprises of mafic volcanic rocks and Vryheid Formation (Ecca Group, Karoo Supergroup) along with the Malmani Subgroup. Stromatolites are common in the Malmani Subgroup and the Vryheid Formation shales and sandstones in the project footprint are unlikely to contain fossils because this is at the extreme margin of the Karoo sediments and no fossils have been reported. The development area has been significantly disturbed by previous farming activities, namely ploughing and planting, over many years. It is unlikely that any fossils would be preserved in the covering soils and sands of the Quaternary that have been ploughed and cultivated and there is a small chance that fossils may occur below ground in the shales of the early Permian Vryheid Formation or in the Malmani Subgroup.

A Fossil Chance Find Protocol has been attached and must be added to the EMP. When excavations have commenced for foundations for the photocells and support structure, a palaeontologist must do a site visit and inspect the diggings.

van der Walt, J. 2021. Heritage Impact Assessment for the Scafell Cluster Project, Free State Province

The study area is characterised by previous cultivation and these activities would have impacted on surface indicators of heritage sites. No structures or archaeological sites of significance were identified in this area, or within the grid connection corridor alternatives considered for the placement of grid connection infrastructure. A Chance Find procedures for Heritage Features has been attached.

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 Final EIA and EMP:

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- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) has no objections to the development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development;
- 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 (Sityhilelo Ngcatsha/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 for offences;
- 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 along with the decision on the Environmental Authorisation (EA) must be submitted to SAHRA for record purposes.

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

Yours faithfully

Sityhilelo Ngcatsha

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Archaeology, Palaeontology, Meteorite Assistant
South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/576490>