

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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Enquiries: Sityhilelo Ngcatsha
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CaseID: 16677

Date: Tuesday November 02, 2021
Page No: 1

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 ILIKWA 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 Ilikwa Solar PV Facility including a Battery Energy Storage System (BESS) and associated infrastructure on portion 5 of the Farm Proceederfontein 100, 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 195 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.

Several heritage sites were identified by the specialists during the field-based survey which includes a cemetery and a large area characterised by a cluster of packed stone walled sites. 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 high heritage sensitivity and 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. No action is required for the entire Ilikwa project or for any of the grid connections.

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

In the Ilikwa Solar PV Facility and associated grid connection, there are stone features (I1, I2, I3, I7, I8, I10, I11, I12, I13) which are of low significance and farming infrastructure and remnants (I4, I5, I9) which are also of low significance along with a small cemetery of 15-20 graves (I6) which is of high significance. These heritage resources are located outside of the grid connection alternatives.

Recommendations

- The recorded cemetery (I6) can be mitigated preferably by avoidance (the sites should be demarcated and avoided with an access gate for family members and a 30 m buffer) and as a last resort by relocation of the graves adhering to all legal requirements.
- I12 the area with various stone packed features is indicated on the 1945 topographic map of the area and is older than 60 years. The site should be subjected to phase 2 mitigation including clearing and mapping after which a destruction permit can be applied for.

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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 EMPr:

- 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. Further additional specific conditions are provided for the development as follows:
- A permit in terms of section 35 of the NHRA must be applied for, for the destruction of site I12 (various stone packed features) and this must be conducted prior to the construction phase;
- 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 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

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Sityhilelo Ngcatsha
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/576491>