

Our Ref:



an agency of the  
Department of Arts and Culture

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[www.sahra.org.za](http://www.sahra.org.za)

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CaseID: 21880

Date: Thursday October 12, 2023  
Page No: 1

## Interim Comment

**In terms of Section 38(8), 38(3) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Rudolph Solar PV 1 (Pty) Ltd

**The activity entails the development of an up to 200MW photovoltaic solar facility and associated infrastructure on the Remaining Extent of the Farm Rudolph No. 48, situated within the Moqhaka Local Municipality area of jurisdiction and within a Renewable Energy Development Zone. The town of Viljoenskroon is located approximately ~21km southeast of of the proposed development (refer to the attached locality map). The project entails the generation of up to 200MW electrical power through photovoltaic (PV) panels. The total footprint of the project will approximately be 582 hectares (including supporting infrastructure on site). The property on which the facility is to be constructed will be leased by Rudolph Solar PV 1 (Pty) Ltd from the property owner, for the lifespan of the project (minimum of 20 years).**

Solis-Environmental has been appointed by Rudolph Solar PV 1 (Pty) Ltd to undertake the Environmental Authorisation (EA) Application for the development of a 175MW photovoltaic solar facility and associated infrastructure on the Remaining Extent of the Farm Rudolph No. 48, situated within the Moqhaka Local Municipality in the town of Viljoenskroon, Free State Province (2023-07-0040).

The Draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) and the 2017 amended NEMA Environmental Impact Assessment (EIA) Regulations. The total footprint of the project will approximately be up to Up to 582 hectares (including supporting infrastructure on site).

CTS Heritage was appointed to provide heritage specialist input as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Lavin, J. 2023. Heritage Impact Assessment In terms of Section 38(8) of the NHRA for the Proposed development of the Rudolph Solar PV 1 near Viljoenskroon, Free State*

A historic stone kraals (Site 031) was observed within the footprint of the Rudolph PV facility. The site has been assigned a low local heritage significance (IIIC), however, it is recommended that a buffer of 50m is implemented around the site. The recommended buffer area is excluded from the development layout and as

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such, no direct impact is anticipated.

The development area is overlain by Quaternary deposits and underlain the Daspoort Formation of the, Pretoria Group, Transvaal SG and largely by unfossiliferous dolerite. It is extremely unlikely that any fossils would be preserved in the overlying soils and sands of the Quaternary. There is a very small chance that fossils may occur below ground in the Daspoort Formation quartzites but this is very unlikely. A Fossil Chance Find Protocol should be added to the EMP.

*Lavin, J., Wiltshire, N. 2023. Archaeological Specialist Study In terms of Section 38(8) of the NHRA for a Proposed Paradys Solar PV Facility Cluster and associated Grid Connections near Viljoenskroon, Free State*

48 observations were made during the survey of the entire Parady PV Cluster. These include buildings (sites 001, 002, 004, 005, 009, 025, 028-030, 032-034, 036, 036, 037, 042-045) and graves (006, 008, 010, 035, 048) at the various werfs included in the study area. At Paradys, the older, likely original settlement footprint was obscured by dense bush and a number of informal 20th century graveyards are located here.

Iron Age stone walled kraals and Later Stone Age artefacts in hornfels, chert and quartz (007, 011-027, 031, 038, 040-041, 046, 047) were found on on site. The kraal enclosures appear to be late, possibly 19th century and historical walling features are also present. The proposed development is unlikely to require very deep excavations that will reveal material at buried at depths.

#### Mitigation Recommendations

100m Buffer zones are to be maintained around the grave sites.

50m Buffer zones are to be maintained around the stone structures that are gives a IIC heritage significance (Section 4.2, Tab 1 of the AIA report, page 25).

*Bamford, M. 2023. Palaeontological Impact Assessment for the proposed Paradys Solar Energy Cluster, Renova, Free State Province Desktop Study (Phase 1)*

The proposed development lies on the Quaternary sands (underlain by the Vryheid Formation) and on the non-fossiliferous Hekpoort Formation. 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.

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The SAHRA Development Application Unit (DAU) notes the heritage studies along with the recommendations provided therein, it is however noted that the Palaeontological Impact Assessment (PIA) maps out an area different to the proposed Paradys PV Cluster.

The PIA must be amended to reflect the study area and the amended PIA must be submitted to the development application on SAHRIS before further comments can be made.

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

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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/620688>

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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.