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: Natasha Higgitt Tel: 021 462 4502 Email: nhiggitt@sahra.org.za CaseID: 12483 Date: Tuesday June 05, 2018 Page No: 1

### **Final Comment**

### In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mr Krishnan Moonsamy (Terence) Govender ACWA Power SolarReserve Redstone Solar Thermal Power Plant RF Office XX07001, 90 Grayston 90 Grayston Drive, Sandton, 2196

### PROPOSED ACWA POWER SOLARRESERVE REDSTONE SOLAR PHOTOVOLTAIC POWER PLANT ON THE REMAINING EXTENT OF THE FARM NO. 469, HAY REGISTRIATION DIVISION IN THE NORTHERN CAPE PROVINCE

Environmental Management Assistance (Pty) Ltd was appointed by ACWA Power SolarReserve Redstone Solar Thermal Power Plant RF (Pty) Ltd to conduct an Environmental Authorisation (EA) Application process for the proposed ACWA Power SolarReserve Redstone Solar Thermal Power Plant on the remaining extent of the farm 469, Hay Registration Division, Northern Cape Province.

A draft Basic Assessment Report (DBAR) has been completed in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 EIA Regulations. The proposed development will have a generation capacity of up to 20MW and will comprise PV power blocks with invertor and transformer collection with supplementary facilities such as substations, network integration and switching yard and access roads covering less than 20 ha. Two site alternatives have been considered.

PGS Heritage and Grave Relocation Consultants were appointed to conduct the Heritage Component of the BAR process.

Fourie, W. 2011. Humansrus Solar Thermal Energy Power Plant, Postmasburg: Heritage Impact Report.

A total of 25 heritage resources were identified that included surface Stone Age artefact scatters, historical structures, historical middens, historical homesteads, and cemeteries. The HIA also notes that no palaeontological studies would be required for the proposed development.

Recommendations provided in the report includes the following:

- Sites PGS06 will need to be documented through surface collection, test excavations and mapping;
- A buffer of 10 m to be enforced around cemeteries AC02 PGS09 and PGS13;

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- If it is not possible to avoid the graves, the graves can be relocated after a full grave relocation process that includes comprehensive social consultation;
- Possible infant burials may be present at ACO013, PGS11-13. These must be monitored during construction;
- General Heritage Management Guidelines in section 6 of the report must be included in the Environmental Management Programme (EMPr).

### SAHRIS Case ID 2918 has reference

(http://sahra.org.za/sahris/cases/redstone-solar-thermal-energy-power-project-2316). This case assessed the original EA application for the CSP Thermal Project as part of the above report. SAHRA issued a Final Comment on the 05/02/2016 stating no objections to the proposed development.

A destruction permit was granted for Site PGS06 on 13/12/2016 which was extended on 17/10/2017 (SAHRIS ID 10423 <u>http://sahra.org.za/sahris/cases/pgs06-application-destruction</u>).

In an Interim Comment issued on 31/05/2018, SAHRA requested that an updated HIA inclusive of a site visit, that reflects the current EA Application, be conducted that must include a Palaeontological Impact Assessment as the development is located in an area of low to very high palaeontological sensitivity according to the SAHRIS PalaeoSensitivity map.

An addendum to the original HIA has since been submitted.

# Fourie, W. 2018. Heritage Impact Assessment: ACWA Power SolarReserve Redstone Photovoltaic (PV) Power Project.

The addendum showed that the proposed PV development will not impact any of the heritage sites identified as part of the 2011 HIA. The HIA also noted the palaeontological desktop assessment conducted in 2011 by Dr John Almond, who had stated that the proposed development area is underlain by the Transvaal Supergroup and the Daniëlskuil Formation which do not contain many fossils, other than microbial assemblages and stromatolites. These rocks are overlain by the Quaternary Gordonia Formation alluvial and aeolian sands that may contain more recent fossils such as root casts, ostrich eggshells, land snails, fresh water bivalves, microfossils, mammalian bones and teeth and horn cores. The overall sensitivity of the development area is low and no further palaeontological studies are required.

Recommendations provided in the report include that the Heritage Management Guidelines in section 7 of the report be included in the Environmental Management Programme (EMPr) for the project.

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### **Final Comment**

After careful consideration of the provided documentation, the SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development and supports the recommendations of the heritage specialists. The recommendations provided by the heritage specialists and the following conditions must be included in the EMPr:

- Once the final layout of the development is finalised, a walk-down of the layout must be conducted by a qualified archaeologist. A report detailing the results of the walk-down must be submitted to SAHRA for comment and review. No construction may occur without comments from SAHRA;
- Should any heritage resources be identified within the proposed development footprint and the layout of the development cannot be changed to avoid impacting the heritage resources, the heritage resources will need to be mitigated. A permit as per section 35 of the National Heritage Resources Act, Act 25 of 1999 (NHRA) and Chapter II and IV of the NHRA Regulations must be applied for this purpose. It must be noted that the permit can only be applied for if the Environmental Authorisation has been granted to the project;
- The Final BAR and appendices must be submitted to the SAHRIS Case application for record purposes;
- 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 (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted. 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. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. 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.
- Should the project be granted Environmental Authorisation, SAHRA must be notified and all relevant documents submitted to the case file.

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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Natasha Higgitt Heritage Officer South African Heritage Resources Agency

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

#### ADMIN:

Direct URL to case: http://www.sahra.org.za/node/503973 (DEA, Ref: )

#### 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.