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30 August 2018

Luanita Snyman-van der Walt
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By email: lvdwalt1@csir.co.za

Dear Luanita

29 SOLAR DEALESVILLE - AMENDMENT OF ENVIRONMENTAL AUTHORISATION FOR EDISON PV

Thank you for providing details of the proposed amendment to the exiting Environmental Authorisation (EA) for the proposed Edison PV facility. I note the changes which relate to the moving of various components of the electrical infrastructure. There will be new alignments for the power lines and the substations have been moved. The only area of concern is the position of the 400/132 kV Main Transmission Substation in the south of the study area. It may be surrounded by a 1.2 m high stock fence, purely to distinguish the area available to the developer from that still in use for farming.

I do not believe that any new impacts to known heritage resources will occur but two new sources of increased risk are identified:

- The new position of the 400/132 kV Main Transmission Substation is about 200 m to the south of the graves recorded at waypoint 926 (Figure 1). The proposed farm fence that will enclose the substation area will run about 60 m from the graves. While this change will not specifically result in any new impacts, it does slightly increase the chances of accidental impacts occurring and the before mitigation impact significance/risk should be increased to moderate for both the construction and decommissioning phases. This is largely because the graves can be very difficult to see in the long grass, especially if driving a large vehicle. The post-mitigation impact significance/risk, however, would remain at very low. I would thus suggest that a new recommendation be added to the effect that the graves be fenced to ensure their visibility and safety (Figure 2). All existing recommendations remain valid and should be included in the amended EA for the electrical infrastructure. The new recommendation is to read as follows:
 - *The set of graves at waypoint 926 must be fenced with a permanent stock fence set at least 5 m away from all sides of the graves. A pedestrian gate must be provided to facilitate access.*
- The new position of the 400/132 kV Main Transmission Substation is about 600 m to the northeast of the archaeological site at waypoint 922 (Figure 1). While this is of no concern, the position of the proposed fence around the substation area is right next to the no-go area around the archaeological site (Figure 3). Due to the nature of the archaeology, of the relatively dense vegetation around the

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spring that lies just south of the study area, and of the proposed stock fence, it is not suggested that this site be fenced off but the ECO should be aware of this area and ensure that activity in this area is minimised.

With the additional recommendation and management measure in place I believe that impacts to heritage resources after mitigation would be of no greater significance than was the case with the existing authorised development and the amended projects should be allowed to proceed.

Yours sincerely


Jayson Orton

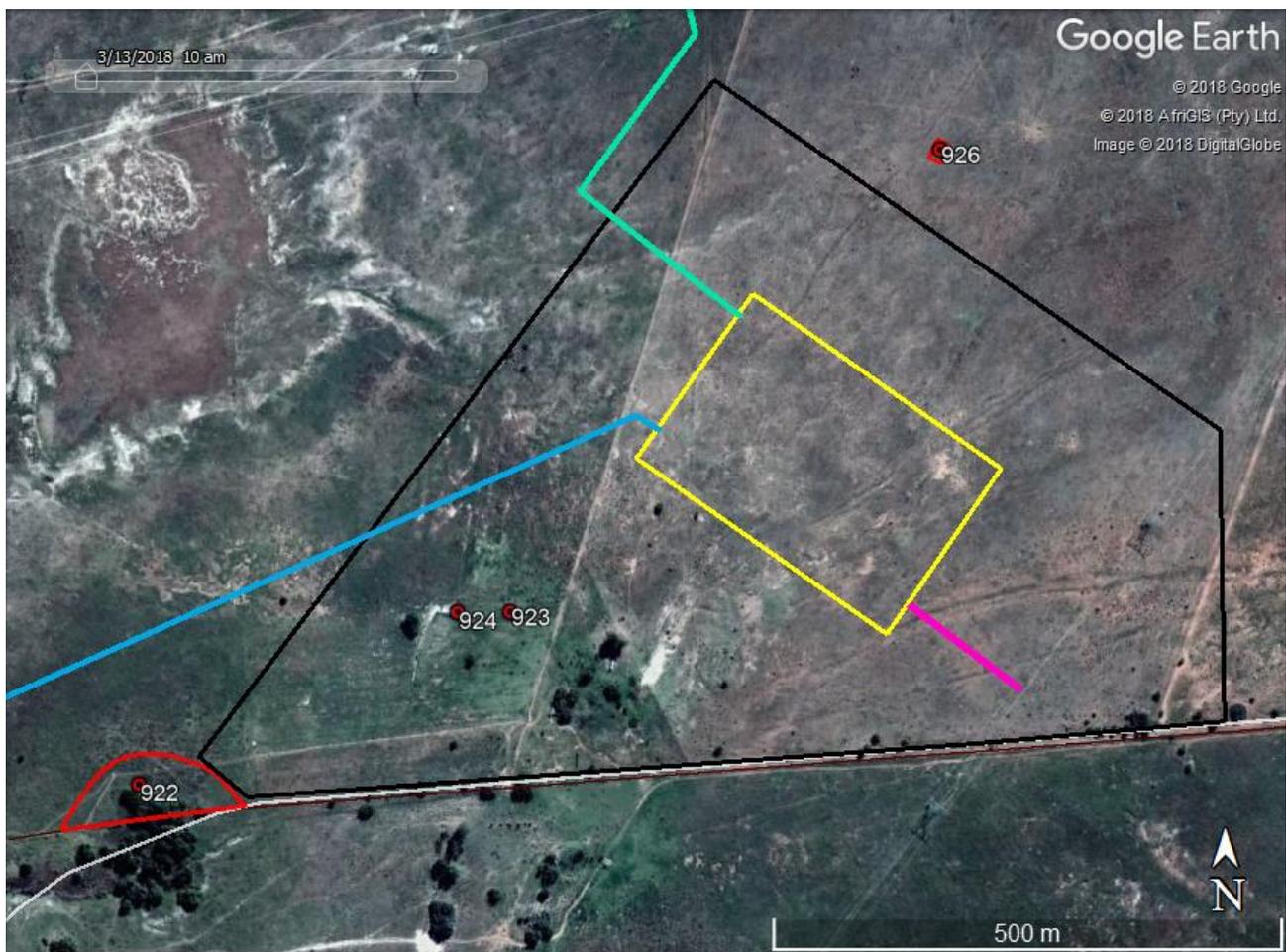


Figure 1: Map of the new 400/132 kV Main Transmission Substation (yellow polygon) and surrounding fenced area (black polygon) showing the three power lines that will enter and leave the substation (blue, turquoise and pink lines), the graves (waypoint 926), a significant archaeological site (waypoint 922) and two insignificant artefact scatters (waypoints 923 & 924).

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Figure 2: Aerial view of the set of graves at waypoint 926 with a buffer of approximately 5 m indicated in red. A fence should be erected along this line.



Figure 3: Aerial view of the archaeological site at waypoint 922 with its no-go area indicated in red. The black line is the line of the proposed stock fence and the blue line is a proposed power line.

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