

**LETTER OF EXEMPTION FOR THE RICHARDS BAY
MINERALS PHOTOVOLTAIC FARM, RICHARDS BAY, KZN**

FOR EXIGENT ENGINEERING

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Abbreviations

HP	Historical Period
IIA	Indeterminate Iron Age
LIA	Late Iron Age
EIA	Early Iron Age
ISA	Indeterminate Stone Age
ESA	Early Stone Age
MSA	Middle Stone Age
LSA	Late Stone Age
HIA	Heritage Impact Assessment
PIA	Palaeontological Impact Assessment

INTRODUCTION

Richards Bay Minerals is planning on developing a solar panel farm as an alternative renewable source of energy for on-site consumption in the King Cetshwayo District Municipality Richards Bay, KwaZulu Natal.

Exigent Engineering Consultants CC has been appointed to oversee the legislative environmental processes applicable to the proposed development. The proposed project involves the development of photovoltaic facilities or infrastructure for the generation of electricity of approximately 23.1 megawatts for an onsite solution. The development of the Solar Farm aims to harvest solar energy as an alternative source of renewable energy for Richards Bay Minerals.

Depending on the PV panel arrangements selected, the PV arrays could be up to 10m high. The tallest component on the site will be the operations and maintenance buildings as well as any centralized inverter stations, which will have a maximum height of four to five meters.

The proposed development site is located on the property of Richards Bay Minerals bordering the eastern site of the RBM main site in Richards Bay, KwaZulu Natal. The proposed development is to be constructed within the property of RBM, Portion 0 of Erf 13130 LOT K45 and Portion 0 of Erf 16317 RBM. This site is suitable for the location of a PV array of up to 22.5MWp. The proposed solar farm site is located within the quarter degree grid cell 2832CA and has the geographic coordinates at 28°41' 15.49,61"S and 32°08' 7,76"E and an approximate extent of 30 Ha.

Umlando was requested to comment on the need for an heritage impact assessment for the proposed photovoltaic project. Umlando suggested that it be exempt from further heritage assessments since the area is highly disturbed and has already had a desktop survey for a different project. Figures 1 – 4 show the location of the site.

FIG. 1 GENERAL LOCATION OF THE STUDY AREA

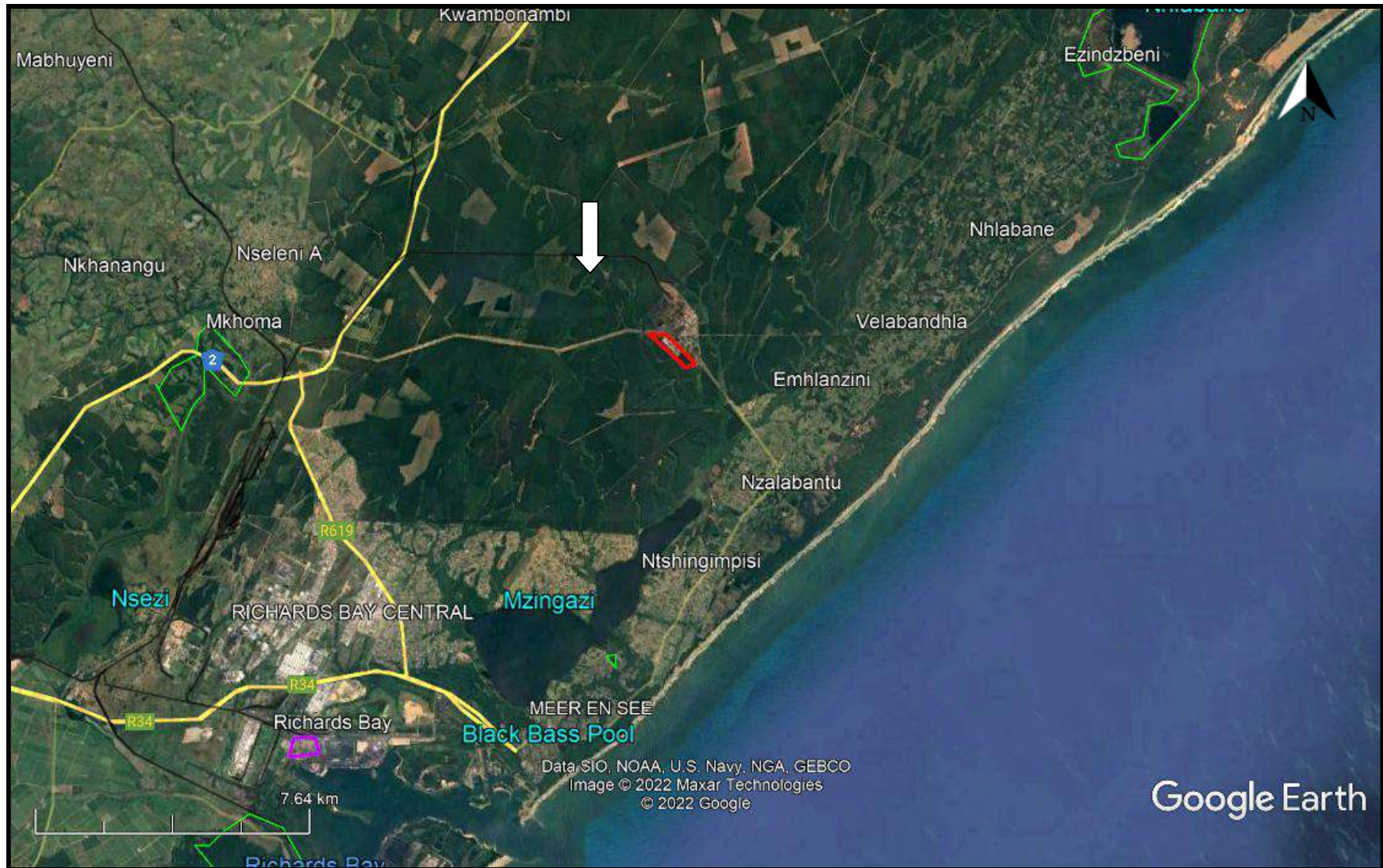


FIG. 2: AERIAL OVERVIEW OF THE STUDY AREA



FIG. 3: TOPOGRAPHICAL OVERVIEW OF THE EASTERN STUDY AREA (1996)

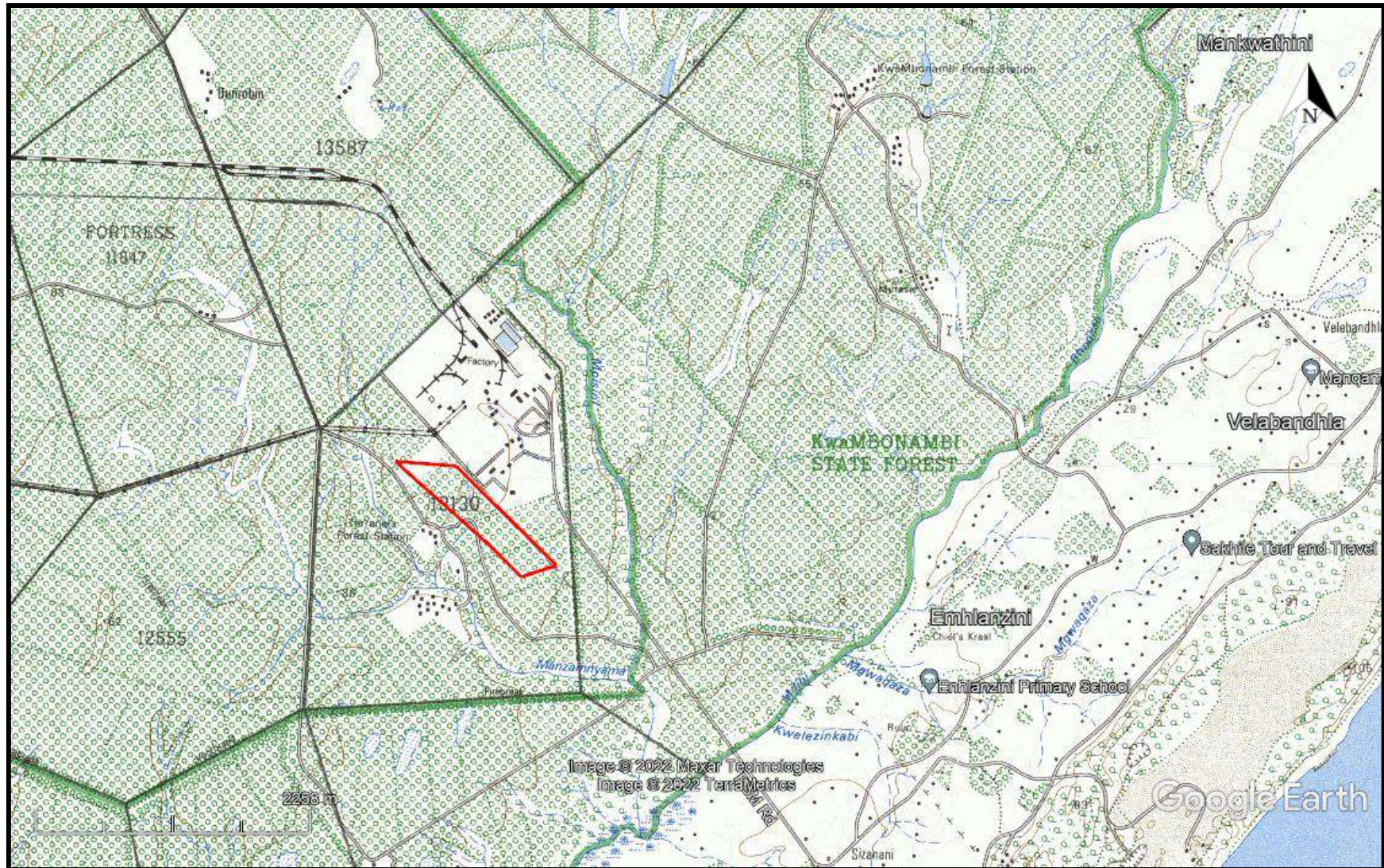


FIG. 4: SCENIC VIEW OF THE STUDY AREA



The desktop study consisted of analysing various maps for evidence of prior habitation in the study area, as well as for previous archaeological surveys. The archaeological database indicates that there are archaeological sites in the general area (fig. 5). Anderson (2022) undertook a desktop study of the proposed Zulti West prospecting area. The current area for the photovoltaic farm was included. No heritage sites were noted to occur within the study area. The desktop study included 1937, 1942,

In addition to the desktop, I have been working in this area as part of the general RBM Heritage Impact Assessments since 1996 and have not noted any heritage sites.

The heritage desktop study suggests that no further mitigation should be required for this development. Any of the original buildings have been demolished as can be seen on the Google Earth imagery.

FIG. 5: LOCATION OF KNOWN HERITAGE SITES NEAR THE STUDY AREA

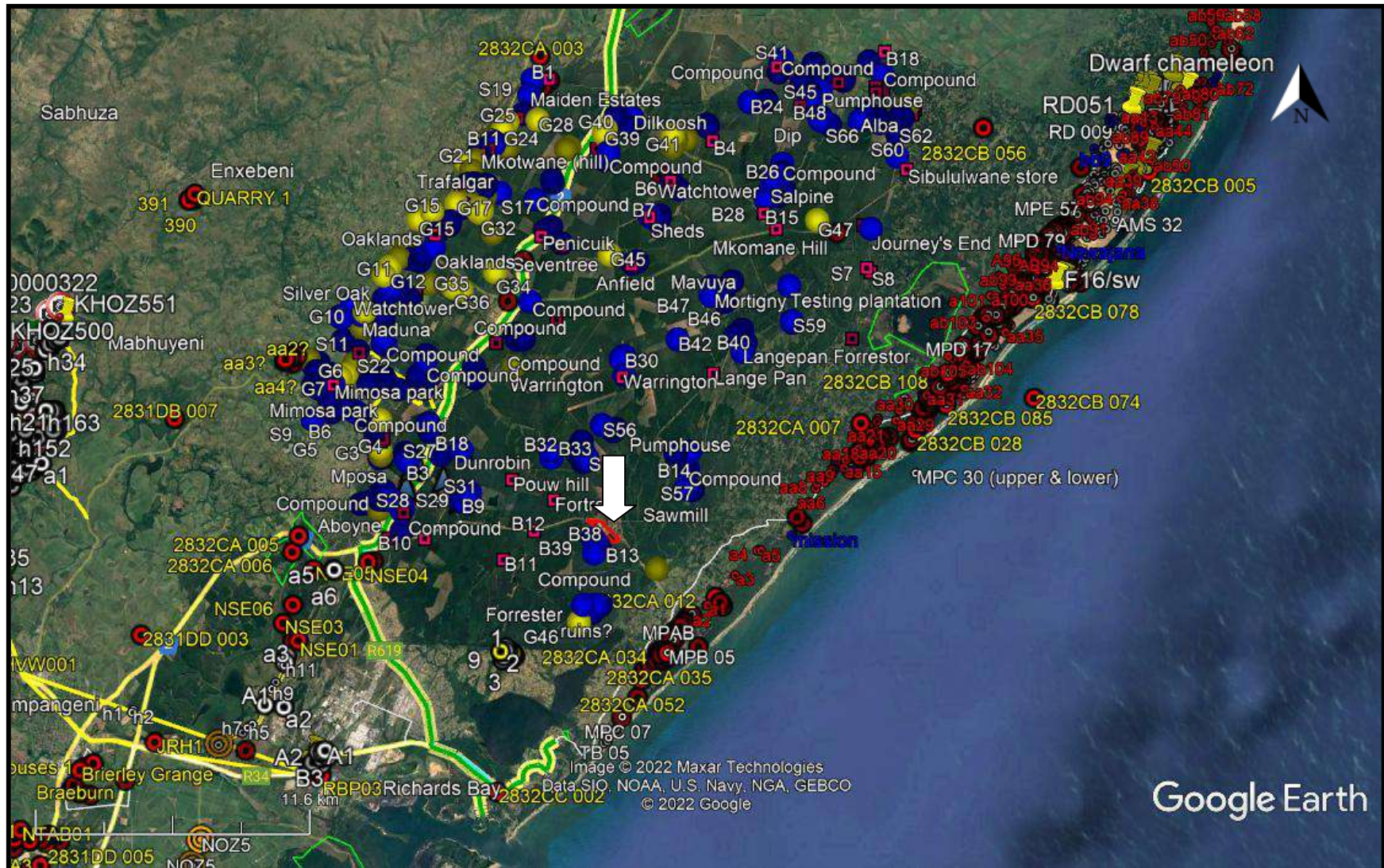


FIG. 7: PALAEOLOGICAL SENSITIVITY



COLOUR	SENSITIVITY	REQUIRED ACTION
RED	VERY HIGH	field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	desktop study is required
BLUE	LOW	no palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

CONCLUSION

The heritage desktop study suggests that no further mitigation should be required for this development. The chances of *in situ* archaeological and palaeontological finds occurring in the study are are nil.

REFERENCES

Anderson, G. 1996 - 2004. Annual Report for Archaeological Surveys of the Zulti North Mining Lease. Annual Report for RBM

Anderson, G. and Anderson, L. 2005 – 2020. Annual Report for Archaeological Surveys of the Zulti North Mining Lease. Annual Report for RBM

Aerial Photographs:

117C_054_65926 - 117C_054_65936

117C_055_65954 - 117C_055_65968

117C_058_66253 - 117C_058_66266

117C_059_66273 - 117C_059_66285

117C_060_66309 - 117C_060_66319

Topographical maps:

2832CA KwaMbonambi 1942, 1968, 2000

2832CB St Lucia 1942, 1968, 2000

Databases:

KZN Museum

SAHRIS

Umlando

EXPERIENCE OF THE HERITAGE CONSULTANT

Gavin Anderson has a M. Phil (in archaeology and social psychology) degree from the University of Cape Town. Gavin has been working as a professional archaeologist and heritage impact assessor since 1995. He joined the Association of Professional Archaeologists of Southern Africa in 1998 when it was formed. Gavin is rated as a Principle Investigator with expertise status in Rock Art, Stone Age and Iron Age studies. In addition to this, he was worked on both West and East Coast shell middens, Anglo-Boer War sites, and Historical Period sites.

DECLARATION OF INDEPENDENCE

I, Gavin Anderson, declare that I am an independent specialist consultant and have no financial, personal or other interest in the proposed development, nor the developers or any of their subsidiaries, apart from fair remuneration for work performed in the delivery of heritage assessment services. There are no circumstances that compromise the objectivity of my performing such work.

A handwritten signature in black ink, appearing to read 'Gavin Anderson', with a horizontal line underneath.

Gavin Anderson
Archaeologist/Heritage Impact Assessor