



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: Boitshepo Motsodisa
Tel: 0123208490
Email: BMotsodisa@sahra.org.za
Case ID: 25315

Date: Thursday, 17 July, 2025

Interim Comment

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

Makhosazana Mngomezulu
Vungandze Projects
35A Grace Avenue
Parkhill Gardens
Germiston
1401

Adams Solar Photovoltaic Project Three (Pty) Ltd intends to conduct an Environmental Authorisation (EA) Amendment for the proposed 75MW Adams Solar Photovoltaic Project Three Energy Facility on portion 0 (remaining extent) of farm Adams 328 in the Joe Morolong Local Municipality, Northern Cape Province.

Vungadze Projects has been appointed to provide an assessment of the impact to heritage resources as per section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Mngomezulu, M. 2024. Revised Phase 1 Heritage Impact Assessment For The Proposed Adams Solar Photovoltaic (PV) Project Three On The Farm Adams 328 Near Hotazel In The Northern Cape.

The author undertook a field survey in September 2024 and no limitations have been noted in the HIA.

2 isolated scatters of stone tools, found out of context, and structures of less than 60 years were identified by the author during the survey.

The HIA recommends the following;

- The contractor should keep within the proposed parameters during the construction phase,
- All employees should be inducted on the importance of Heritage Sites and Resources,
- Should heritage resources be found on site during excavation apart from the possible grave; be it archaeological artefacts such as stone tools and/or pottery; burial grounds and graves; the contractor should cease construction immediately and contact the client.
- The possibility of uncovering unearthed human remains and shallow grave(s) should not be ruled out.

The proposed Adams Solar PhotoVoltaic (PV) Project Three



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Should potential human remains be found on site, the contractor should cease construction immediately and the South African Police Service and the client should be contacted.

- It should be noted that no heritage resources should be removed on site without a permit application from SAHRA.

Interim Comment

The SAHRA Development Applications Unit (DAU) acknowledges the submitted Heritage Report however,

A portion of the proposed development is located within an area of moderate Palaeontological Sensitivity as per the SAHRIS PalaeoSensitivity map. As such, a desktop Palaeontological Impact Assessment (PIA) must be undertaken by a qualified palaeontologist. (See <https://www.palaeosa.org/> for a list of qualified palaeontologists). The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.

The Palaeontological Minimum Standards refer to a Letter of Recommendation for Exemption for further studies should the specialist deem it appropriate. SAHRA reserves the right to insist on a field-based assessment should the Letter of Recommendation not provide ample information to make an informed comment.

Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

Further comments will be issued upon receipt of the above requested reports and a DBAR/DEIR that incorporates the results of the specialist assessment. The applicant is advised to extend the EA process in terms of section 19(1)b of the NEMA EIA regulations in order to address this comment.

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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Direct URL to case: <https://sahris.org.za/node/381786>