

- 9 May 2016 -

ATTENTION:

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RE: SAHRIS CaseID 9384 –

Response to the SAHRA Interim Comment

Phase 1 Archaeological & Cultural Heritage Impact Assessment – Metsimatala 150MW CSP Solar Energy Facility, Groenwater No 453, (near Postmasburg), Siyanda District Municipality, Northern Cape

1) INTRODUCTION

This letter has been compiled to address the SAHRA Interim Comment (SAHRA 2016) requirements raised on SAHRIS CaseID 9384 (SAHRA 2016), with specific reference to archaeological and cultural heritage, including:

- A map showing the track logs of the area surveyed in the AIA must be submitted before further comments can be issued;
- The Visual Impact of the proposed project on the surrounding heritage resources must be addressed i.e. the cultural landscape of the Old Metsimatala Village (e.g. MVIA2, PVIA1 and PVIA18) and the cemetery MVIA3; and
- If any comments regarding heritage resources are submitted by the public during the Scoping Phase PPP process, these issues must be considered by the heritage specialist during the EIA phase.

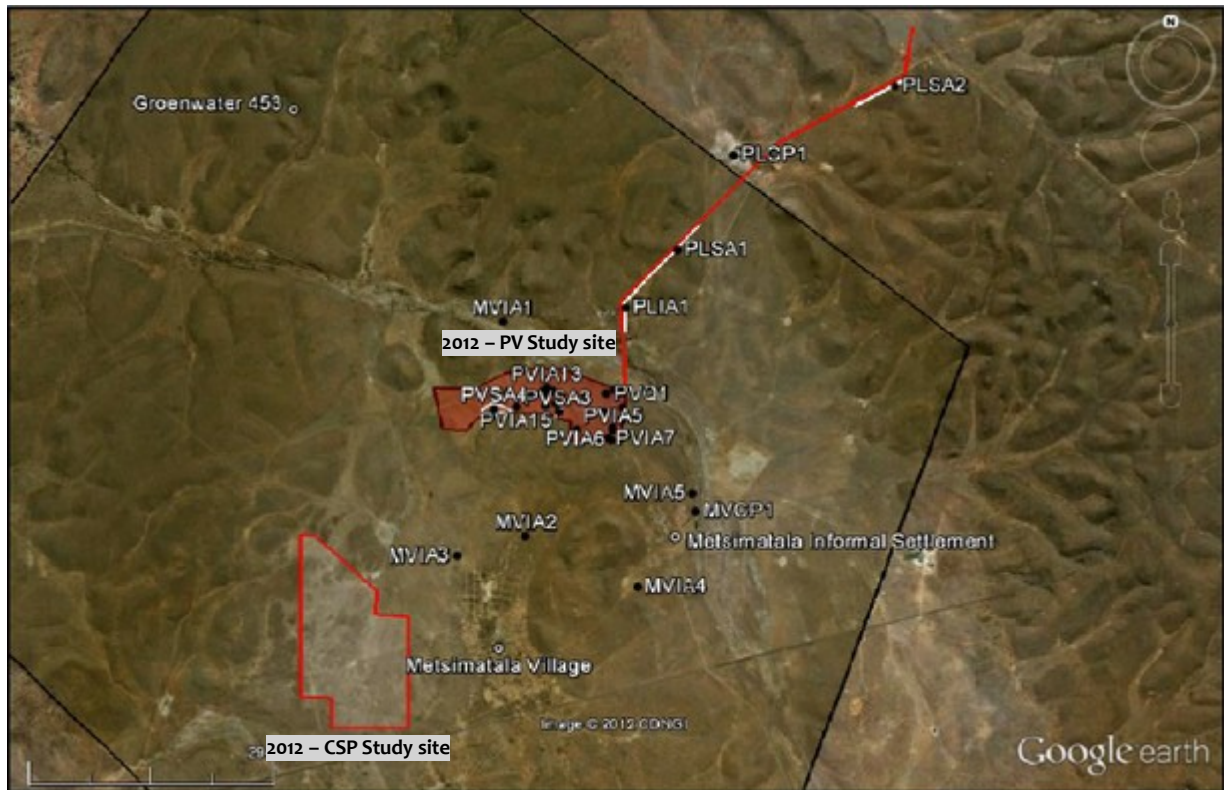
This letter aims to address the first 2 requirements raised by SAHRA. The third and last requirement will be addressed during the course of the EIA process, should the need therefor as stipulated by SAHRA arise.

2) REQUIREMENT 1

(See Page 5).

3) REQUIREMENT 2

The Phase 1 AIA report for the Metsimatala 150MW CSP Solar Energy Facility (Van Ryneveld 2016) effectively comprises an amendment submission, and should therefore be read in conjunction with the original Phase 1 AIA for the Solar Energy development on the affected property (Van Ryneveld 2012). The Van Ryneveld (2012) report includes a literature study on cultural landscapes with an assessment of identified archaeological and cultural heritage resources thereto done according to UNESCO (2005) criteria. Basic literature relating to development impact on the cultural landscape will not be repeated for purposes of this response; brief explanatory notes regarding the initial proposed development and associated cultural landscape ratings will be addressed for interpretative purposes with reference to the 2016 amended project particulars and study site.



Map 1: Phase 1 AIA results of the 2012 field assessment in relation to the then proposed 50MW PV and 50MW CSP study sites (Van Ryneveld 2012)

The original Metsimatala development proposal centered on 2 proposed study sites, namely a 50MW PV and a 50MW CSP study site. Identified archaeological and cultural heritage resources were mapped according to the proposed 2 study sites, and relevant recommendations made at the time. From a cultural landscape perspective three landscape types were identified with assessments according to UNESCO criteria summarized as (Van Ryneveld 2012):

1. Stone Age (MSA and macrolithic LSA) –

‘The Middle Stone Age (MSA) and macrolithic (LSA) Cultural Landscape of the Metsimatala Solar Project study site can be classified, according to the UNESCO Operational Guidelines (Punnell 2006), as an “organically evolved fossil landscape” that has been least evidently shaped by humans.’

2. Later Iron Age (BaThlaping) –

‘The BaThlaping Later Iron Age (LIA) Cultural Landscape of the Metsimatala Solar Project study site can be classified, according to the UNESCO Operational Guidelines (Punnell 2006), as an “organically evolved continuing cultural landscape”, shaped by a range of combined works and human impacts.’

3. Colonial Period (Industrial Revolution) –

‘The Colonial Period Industrial Cultural Landscape of the Metsimatala Solar project study site can be classified, according to the UNESCO Operational Guidelines (Punnell 2006), as an “organically evolved continuing cultural landscape”, designed and created intentionally by man.’

It was further stated that (van Ryneveld 2012): *‘Visual impact of the Metsimatala Solar Project on the multi-layered cultural landscape of Groenwater 453 will be high, permanent and non-mitigatable: Despite the fact that structures are in theory mitigatable (structures can be dismantled), projected energy demands and the current emphasis on green, renewable energy would very likely prohibit dismantlement of a nationally essential resource. Demand for energy would thus most likely render the project non-mitigatable. This permanent visual impact on the cultural landscape will most critically affect the Later Iron Age Thlaping landscape: Regularity of the type of Stone Age resources identified at Groenwater 453 (and Plaas 455), within a more immediate regional and greater Northern Cape context, lessens the significance of visual impact on the Stone Age cultural*

landscape. The very transitory goal of the Colonial Period Industrial landscape speaks of its significance at start and end destinations. But the uniqueness of the Later Iron Age Thlaping cultural landscape, the focus of which remains Old Metsimatala Village, with its poorly recorded history, will be undoubtedly jeopardized. However, it is development (and associated Phase 2 archaeological monitoring and recording) that will provide for the first scientific glimpse into the history of Old Metsimatala Village and surrounds. It is also the very descendants of Old Metsimatala Village that will directly benefit from the project; an impoverished community that will through development ensure a presence for themselves more reminiscent of their past.’

The initial Phase 1 AIA report (Van Ryneveld 2012) for the Metsimatala development was submitted to SAHRA, with recommendations regarding identified sites made, also with reference to significance and impact on the cultural landscape. Recommendations, including Phase 2 archaeological monitoring and recording of identified resources clustered in the vicinity of the originally proposed PV solar field was accepted by SAHRA in their comment (SAHRA 2012) stating: ‘The proposed development of the Metsimatala Solar Plant should be allowed to proceed. In light of the presence of Stone Age and Iron Age artefacts along the powerline alignment¹ and within the PV Solar Field, a professional archaeologist should be appointed to monitor this development impact. A report based on this monitoring should be submitted to SAHRA for comment. Furthermore, a destruction permit², obtainable from SAHRA, will be necessary for construction of the CSP Solar Field to commence. Conservation measures need to be implemented, with prior engagement with the local community, to ensure the conservation of the Iron Age cemeteries within the site...’

Amended 2016 project particulars, excluding the initially proposed 50MW PV study site from development imply, with direct effect, that Old Metsimatala Village, including surrounding plots where development impact would have occurred, will be conserved in totality; both the tangible remains thereof and the cultural environment within which they are situated. Site MVIA2, Old Metsimatala Village, would have been conserved within the initial development layout and will also be conserved within the 2016 proposed development layout. Sites PVIA 1 and PVIA18 comprises of the cluster of identified sites related to the plots situated north of Old Metsimatala Village. Amendment of the study site will ensure not only the conservation of Sites MVIA1 and MVIA18, but all of the identified resources related to the plots area, originally situated on, or in proximity to the originally proposed 50MW PV study site (van Ryneveld 2016, pp13-14).

The 2016 amendment proposal includes that the initially proposed 50MW CSP study site will be increased to accommodate a 150MW study site, with the proposed study site now situated adjacent to the Site MVIA3 cemetery. Development will not impact directly on the resource, but the cultural landscape within which the site is situated will be affected by the amendment study site to a larger degree than the 2012 proposed 50MW CSP study site. Site MVIA3 is of dual cultural significance, as a heritage site containing graves older than 60 years of age, but also as a contemporary cemetery, and included as such in the northern extremity of contemporary Metsimatala Village layout. Visual Impact on the cemetery within the proposed 2016 development layout can be described as high and permanent, but it is important to consider the fact that the historical cemetery has been incorporated within contemporary Metsimatala Village, as an integral part of community life situated at the northern boundary of the village, and with the cemetery again being used, i.e. the cemetery comprises the operational cemetery of Metsimatala. Visual Impact therefor needs to be considered within its geographic and socio-economic context as part of the village layout, and the community it serves. In accordance with the above van Ryneveld (2016) stated: ‘...it can reasonably be concluded that little to no negative cumulative impact will result from the proposed Metsimatala CSP 150MW Solar Energy facility development on recorded archaeological and cultural heritage resources, as defined and protected by the NHRA 1999. The proposed development will in fact be contributory to living heritage, ensuring the sustainability of the Thlaping on their land; tribal, by virtue of their recorded history on the property, but with the prospect of a green, economically sustainable future.’

¹ The powerline alignment referred to in the SAHRA (2012) comment has changed significantly and a Phase 1 AIA report of the final alignment related to the 150MW CSP Solar Energy Facility has been submitted separately.

² A subsequent SAHRA – ASAPA circular indicated that Site Destruction Permits will no longer be issued for low density occurrences and sites not subjected to Phase 2 mitigation. The recommendation pertaining to the Site Destruction Permit prior to development at the CSP facility was accordingly not re-addressed in the Van Ryneveld (2016) report.



Map 2: Cemetery site MVIA3 located at the northern extremity of contemporary Metsimatala Village and incorporated in the village layout. The site comprises the operational Metsimatala cemetery. (White polygon – Contemporary Metsimatala Village)

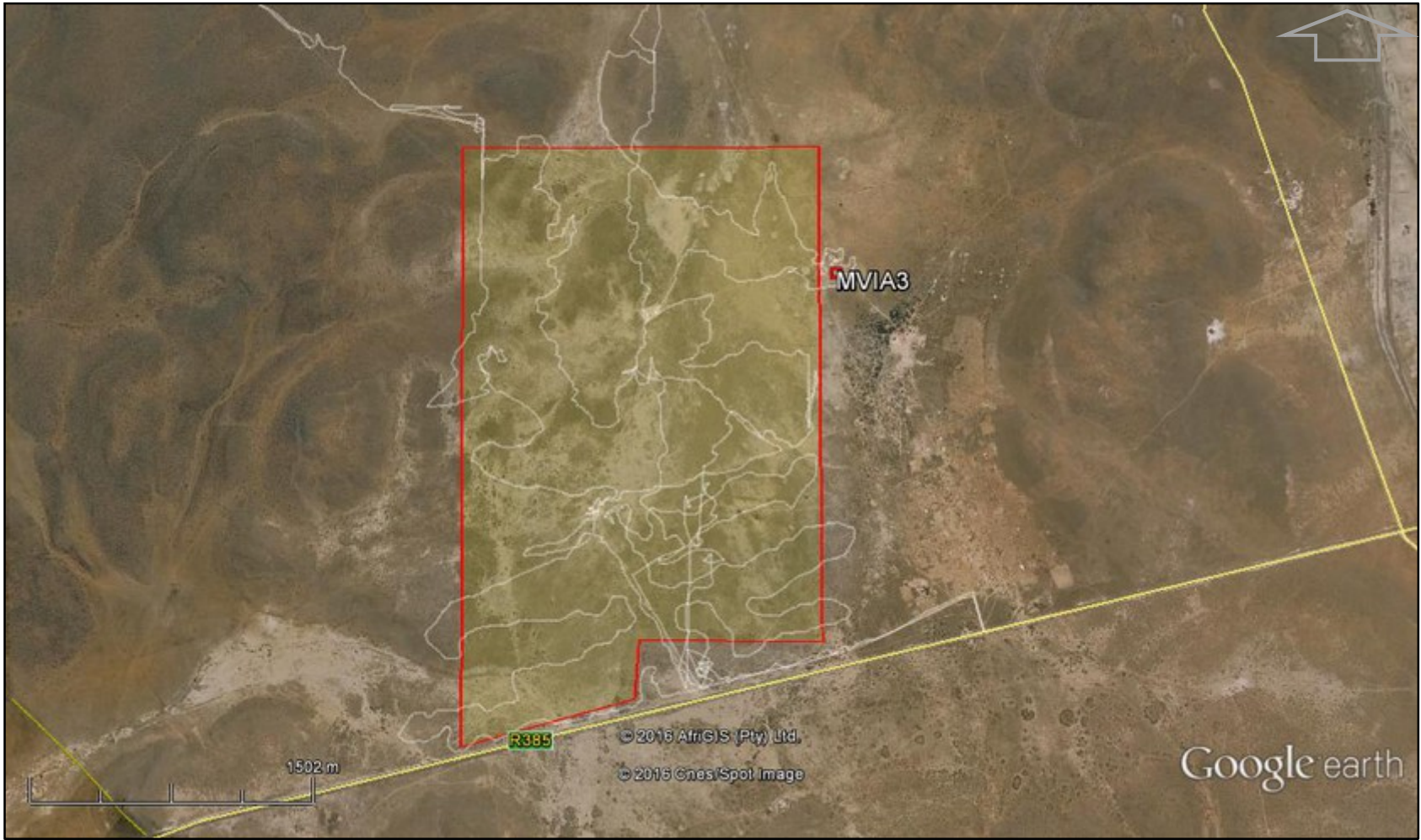
4) REFERENCES

1. SAHRA. 2012. Review Comment on Archaeological and Palaeontological Impacts Assessments. Metsimatala Solar Project, Groenwater 453, Siyanda District Municipality, Northern Cape.
2. SAHRA. 2016. Interim Comment – SAHRIS CaselD 9384. Metsimatala 150MW Concentrated Solar Power Plant and Associated Infrastructure, Groenwater 453, Tsantsabane Local Municipality, Eastern Cape.
3. Van Ryneveld, K. 2012. (ArchaeoMaps). Phase 1 Archaeological Impact Assessment – Metsimatala Solar project, Groenwater 453, Siyanda District Municipality, Northern Cape, South Africa.
4. Van Ryneveld, K. 2016. (ArchaeoMaps). Phase 1 Archaeological and Cultural Heritage Impact Assessment – Metsimatala 150MW CSP Solar Energy Facility, Groenwater No 453, (near Postmasburg), Siyanda District Municipality, Northern Cape.

I trust the above will serve to address requirements as stipulated in the SAHRA 2016 Interim Comment.

Yours faithfully,

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Map 3: Map indicating the Metsimatala 150MW CSP Solar Energy Facility, Groenwater No 453, and indicating the relevant survey track log (opaque white)