



an agency of the  
Department of Arts and Culture

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CaseID: 13125

Date: Thursday February 21, 2019  
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## Final Comment

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

Attention: K2018091758 (SOUTH AFRICA) (Pty) Ltd

**K2018091758 (SOUTH AFRICA) (Pty) Ltd is proposing the establishment of a commercial photovoltaic (PV) solar energy facility (SEF), called Gaetsewe Solar, on the farm known as Legoko Farm No 460 portion 2, situated in the District of Kuruman Rd, Northern Cape Province, within the jurisdiction area of the Gamagara Local Municipality.**

Cape Environmental Assessment Practitioners have been appointed by K2018091758 (South Africa) (Pty) Ltd to undertake an Environmental Authorisation (EA) Application and Environmental Impact Assessment (EIA) process for the proposed Gaetsewe Solar Project on Portions 2 of the Farm Legoko 460 and Grid connection on Farm Sekgame No.461, situated in the District of Kuruman Rd, Northern Cape Province.

A draft EIA Report has been submitted in terms of the National Environmental Management Act, No 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include fixed, single or double axis solar panels covering 200 ha. Associated infrastructure will include an on-site switching station, auxiliary buildings, inverter stations, transformers and internal underground cabling, access and internal roads, laydown area, overhead 132kv electrical distribution grid to the Sekgame switching station, rainwater tanks, and fencing and security infrastructure. It must be noted that SAHRA was not consulted as part of the preceding Scoping Phase of the EA application.

Perception Heritage Planning was appointed to provide the heritage component as part of the EA in terms of section 24(4)b(iii) of the NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). Natura Viva CC and Centre for Archaeological Resources Management CC were appointed to provide specialist heritage input into the Heritage Impact Assessment.

*De Kock, S. 2018. Integrated Heritage Impact Assessment in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act 25 Of 1999) for Proposed Development of the Gaetsewe Solar Facility on Portion 2 of the Farm 460 and Grid Connection on Farm Sekgame No.461, Legoko (Kathu), Kuruman District, Gamagara Local Municipality, Northern Cape Province.*

The Integrated HIA summarized the results of the Palaeontological Desktop Study (PDS) and Archaeological



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Impact Assessment (AIA) (to be discussed below), along with an assessment of the cultural landscape and Visual Impact Assessment (VIA). The cultural landscape has been previously impacted and permanently altered by the mining activities within the area. The development site was not found to be of cultural significance. The VIA showed that while the grid connection would be highly visible from the N14, the impact of the visual intrusion would be low due to the high state of transformation of the landscape. The exposure of the PV facility will be medium to low from the N14 with the impact of the visual intrusion as low due to the mining landscape.

Recommendations provided in the report include that the Gaetsewe Preferred Alternative 1 is preferred marginally over the southern alternative layout.

*Almond, J. E. 2018. Palaeontological specialist assessment: desktop study Proposed 75 MW Gaetsewe Solar PV Energy Facility and Associated Infrastructure on the Farm 460 Legoko Portion 1 and 2, and Farm 461 Sekgame Near Kathu, Gamagara Local Municipality, Northern Cape.*

The proposed development is underlain at great depth by Precambrian rocks of the Transvaal Supergroup. Surface geology includes the Kalahari Group sediments from the Mokolanen and Gordonina Formations which are of low palaeontological sensitivity. The closest fossil locality is at the Kathu Pan site, some 5.5 km northwest of Kathu. There is no preference for either alternative location for the PV facility or grid connection.

Recommendations provided in the report include the following:

- The ECO and / or the Site Engineer responsible for the development must remain aware that all sedimentary deposits have the potential to contain fossils and he / she should thus monitor all substantial excavations into sedimentary bedrock for fossil remains. If any substantial fossil remains (e.g. vertebrate bones, teeth, horn cores) are found during construction SAHRA should be notified immediately so that appropriate mitigation (i.e. recording, sampling or collection) by a palaeontological specialist can be considered and implemented, at the developer's expense;
- A chance-find procedure should be implemented so that, in the event of fossils being uncovered, the ECO / Site Engineer will take the appropriate action;
- The mitigation measures proposed here should be incorporated into the Environmental Management Programme (EMP) for the Gaetsewe Solar PV Solar Energy Facility project. The palaeontologist concerned with mitigation work will need a valid collection permit from SAHRA. All work would have to conform to international best practice for palaeontological fieldwork and the study (e.g.



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data recording fossil collection and curation, final report) should adhere to the minimum standards for Phase 2 palaeontological studies published by SAHRA (2013).

*Nilssen, P. 2018. Phase 1a Archaeological Impact Assessment Proposed Gaetsewe Solar and Grid Connection on Portion 2 of the Farm Legoko No 460, District of Kuruman Rd, Gamagara Local Municipality, Northern Cape Province Conducted in terms of Section 38(8) of the National Heritage Resource Act (No. 25 of 1999).*

Isolated surface scatters of Later Stone Age (LSA) lithics with few Middle Stone Age (MSA) lithics were identified within the development area. The most common formal lithics were scrapers, notched pieces and adzes. Surprisingly, Early Stone Age (ESA) tools were absent from the area, as these are the most common cultural material around Kathu. The identified surface lithics scatters were rated as sites of low significance. No other heritage resources were identified in the development footprint.

Recommendations provided in the report include the following:

- Archaeological resources identified during this study do not require further recording/studies, and because they are considered to be of low heritage value and have been adequately recorded through this assessment, it is suggested that they can be disturbed or damaged without a permit from SAHRA;
- In the event that excavations and earthmoving activities expose significant archaeological or heritage resources, such activities must stop and SAHRA must be notified immediately;
- If exposed during development, archaeological resources must be dealt with in accordance with the National Heritage Resources Act (No. 25 of 1999) and at the expense of the developer;
- In the event of exposing human remains during construction, the matter will fall into the domain of the South African Heritage Resources Agency and will require a professional archaeologist to undertake mitigation if needed. Such work will also be at the expense of the developer.

### Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development and supports the recommendations of the specialists. The recommendations of the specialist and the following conditions must be included in the EMPr:

- The Final EIA and EMPr must be submitted to SAHRA for record purposes;

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- 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 as per section 35(3) and 36(6) of the NHRA. 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;
- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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

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

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/514349>  
(DEA, Ref: 14/12/16/3//1083)

**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.