



Interim Comment

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

Attention: Ms Umeshree Naicker
Savannah Environmental (Pty) Ltd
PO Box 148
Sunninghill
2157

PROPOSED ALLDAYS SOLAR FACILITY PHOTOVOLTAIC (PV)/ CONCENTRATED PHOTOVOLTAIC (CPV) SOLAR ENERGY FACILITY – PHASE 1(75MW), LIMPOPO PROVINCE

Gaigher, S., April 2012. Proposed Alldays Solar Facility Photovoltaic (Pv)/ Concentrated Photovoltaic (Cpv) Solar Energy Facility – Phase 1(75mw), Limpopo Province

Durand, J.F., May 2012. Proposed diamond mine adjacent to Venetia Mine, Limpopo Province SCOPING REPORT - PALAEOLOGY

Biotherm Energy (Pty) Ltd. proposes a 75Mw solar facility on the farm 102 Gotha MS, near Alldays, Limpopo Province. The proposed footprint of the solar farm is 175 hectares and will require among other things a new on-site substation to connect via a loop-in loop-out to the Soutpan/Venetia 1 132Kv power line to evacuate the power from the facility into the Eskom Grid. The proposed solar farm is situated adjacent the Venetia Diamond Mine.

The proposed solar facility is situated 25km from Mapungubwe Cultural Landscape which is a World and National Heritage Site. According to the heritage report the solar farm will be located about 3km from the current World Heritage Site buffer zone. An Archaeological Impact Assessment and a Palaeontological Desktop Assessment were undertaken for this project. No archaeological sites were identified on the property investigated by the archaeologist. The specialist reported that no occupational sites were identified and that the area is geographically not suited for occupation. This statement is puzzling since archaeological sites have been identified on the De Beers Venetia Mine property which is next to this property. The author provides no substantial evidence why archaeological resources should not occur on this property. The author also provides no information on how and where this area was surveyed. For all the reasons above, SAHRA considers this a fatally flawed report.

According to the palaeontologic assessment the area is dominated by migmatite, gneiss and ultrametamorphic rocks of the Limpopo Metamorphic Belt and sediments of the Tuli Block of the Karoo Supergroup. The report





notes that the Eccca Group is characterized by shale, mudstone, sandstone and seams of coal and that in the Tuli Basin the Eccca Group is represented by the Mikambeni and the Madzaringwe formations. The most likely fossil material that could be uncovered are fossil leaf imprints such as Glossopteris. However, according to the specialist the plant fossils recovered from the adjacent Venetia site were only very fragmentary fossils.

Please note that heritage resources are protected under the National Heritage Resources Act, which is Act 25 and not 22 as erroneously stated in the HIA.

Decision:

-Although no heritage resources were identified during the field assessment, the increase of industrial and related infrastructure development in the area and how this will affect the future status of Mapungubwe, is a major concern to SAHRA;

- Previous Heritage Impact Assessments in the area have identified that the Mapungubwe Cultural Landscape is larger than the declared core area and its buffer zone. The author's assessment that the project area is geographically not suited for occupation is therefore refuted, especially considering that archaeological sites have been found on the De Beers Venetia Mine property.

- SAHRA is aware that an Environmental Management Framework is currently being developed for the area which will guide land use activities. It is the opinion of SAHRA that no new developments should be approved in and around Mapungubwe Cultural Landscape before the completion of the EMF.

- Considering the importance of the Mapungubwe World and National Heritage Site and its associated cultural landscape, SAHRA does not support the establishment of the proposed solar facility.

- However, if the competent authority approves this project, a comprehensive HIA must be undertaken that not only assesses heritage resources on the proposed property but also seeks to address the following:

1. Provide a comprehensive assessment of the importance of the Mapungubwe Cultural Landscape;
2. A proper indication of the types and ranges of heritage resources likely to be encountered drawing on any research that has been undertaken;
2. Previous heritage surveys undertaken in the area and a discussion of the results if these are available;
3. How the development will impact on the integrity and authenticity of Mapungubwe Cultural Landscape and any mitigation strategies;
4. It is recommended that the project area should be resurveyed with a clear explanation of the survey methodology and GPS track paths. Considering the significance of the project area it is highly recommended that survey should be conducted by a team of qualified heritage practitioners.

SAHRA will issue its final recommendations as soon as the updated report is received dependent on the decision of the competent authority.





Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Phillip Hine
Heritage Officer

Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/59019>
(DEA, Ref: 14/12/16/3/3/2/329)

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.

