



Final 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

Biotherm Ltd. (Pty) proposes the establishment of a Photovoltaic Solar facility on a portion of the Farm Gotha 102, near Alldays, Limpopo Province. This comment relates to the fourth version of the heritage report submitted by the Environmental Assessment Practitioner, since earlier versions were considered inadequate for decision making purposes.

The proposed Solar facility will be situated adjacent the existing Venetia Diamond Mine and will generate up to 75MW of electricity. The proposed project received Environmental Authorisation in April 2013. According to the documents submitted to SAHRA the Solar Facility will be located approximately 3km outside the southern border of the Mapungubwe World Heritage Site Buffer Zone and will have no impact on heritage resources since none were identified by the specialist. It is also argued that there will be no visual impact on the Mapungubwe Cultural Landscape since the proposed site is buffered by the Venetia Diamond Mine.

Discussion

The importance of Mapungubwe Cultural Landscape (MCL) cannot be understated; it is both a National and World Heritage Site. It is a major concern to SAHRA that developments are being approved in such an important and sensitive area without the cumulative impacts that this and other developments are likely to have on the MCL being well understood. It is the opinion of SAHRA that the Environmental Management Framework that is currently being developed would play an integral role in defining land use activities for the area. It is also a concern that developments are being assessed on a 'piece-meal' basis which could result in large scale industrialisation.

Decision

The heritage report that was submitted in support of this project is of a poor standard and hastily compiled. It is not usual or acceptable practice for four revisions of the same report to be submitted in as many days. This is regrettable as it casts serious doubt over the validity of the report and its conclusions. This type of practice is not supported by SAHRA and must be avoided in the future. SAHRA expects reports must adhere to SAHRA Minimum Standards for report writing the first time they are submitted.





However, considering that the proposed solar facility is situated outside the Mapungubwe World Heritage Site Buffer Zone and to the south of Venetia Mine, SAHRA has no objection to the proposed development on the following basis:

1. The proposed project will have no negative visual impact on the Mapungubwe Cultural Landscape;
2. The project is situated 3km outside the World Heritage Site Buffer Zone and to the south of the existing Venetia Diamond Mine,
3. No archaeological or any other heritage resources were identified by the specialist and that this area is considered to carry a low potential for the discovery of archaeological resources,
4. The approval of this project should not be considered as a precedent for the development of similar or other types of industrial developments in the area.

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.

