



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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CaseID: 13729

Date: Friday May 24, 2019  
Page No: 1

## Final Comment

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

Attention: ABO Wind Aggeneys 2 PV (Pty) Ltd

**The development of a 100MW solar photovoltaic (PV) facility and associated infrastructure is proposed on the Remaining Extent of the Farm Bloemhoek 61, located approximately 11km south-east of Aggeneys in the Northern Cape Province. The solar PV facility**

Savannah Environmental (Pty) Ltd has been appointed by ABO Wind Aggeneys 2 PV (Pty) Ltd to conduct an Environmental Authorisation (EA) Application process for the proposed Aggeneys PV 1 Solar Energy Facility (SEF) with associated infrastructure, near Aggeneys, Northern Cape Province.

A draft Basic Assessment (DBAR) has been completed in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include the construction of an array of PV panels with a generation capacity of up to 100 MW, mounting structures for the PV panels, cabling, on-site invertors, an on-site substation, site offices and maintenance buildings, including workshops, temporary laydown areas, and internal roads and fencing.

ASHA Consulting and Natura Viva CC have been appointed to provide heritage input into the EA Application process as per section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Orton, J. 2019. Heritage Impact Assessment: Proposed Aggeneys 2 – 100MW Solar PV Facility and Associated Infrastructure Near Aggeneys, Namakwaland Magisterial District, Northern Cape*

No heritage resources were identified within the proposed footprint; however, several isolated stone artefacts were noted as part of the background scatter of the landscape. An isolated lower grindstone was identified on the western boundary of the project area that will not be impacted. Small stone-walled features were noted on a rocky hill north of the study area, and an ephemeral artefact scatter consisting of a small grindstone, two quartz flakes and two ostrich eggshell fragments was identified 1.2 km south of the proposed footprint. Two possible graves of an unknown age were identified on the edge of the project area near a small rocky hill noted above. None of the identified heritage resources will not be impacted as they are located outside of the project footprint, though an indirect impact of minor significance would be if people visited the hill and disturbed any of the identified heritage features



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As the project area is near the Gamsberg, there may be living heritage sites in the surrounding area due to the possible location of a San massacre site within the mountain.

Recommendations provided in the report include the following:

- A 30 m buffer has been demarcated around the hill shown in Figure 11 of the HIA;
- Declare rocky hills no-go areas and keep workers/vehicles away from them;
- If any change in the footprint occurs, then an archaeologist should be consulted for an opinion on whether a survey is required; and
- If any archaeological or palaeontological material or human burials are uncovered during the course of development, then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

*Almond, J. E. 2018. Palaeontological Heritage Assessment: Desktop Study for the Aggeneys Proposed PV Solar Energy Facilities on the remaining extent of the farm Bloemhoek 61 and associated power line corridors near Aggeneys, Namakwa District Municipality, Northern Cape.*

The proposed development area is underlain at depth by unfossiliferous igneous and metamorphic basement rocks of the Namaqua-Natal Province, which is overlain by Late Caenozoic superficial sediments of the Kalahari Group of low to very low palaeontological sensitivity. The overall impact of the development will be very low.

Recommendations provided in the report include the following:

- Pending the potential discovery of significant fossil remains during the construction phase, in which case the Chance Fossil Finds Protocol appended here should be implemented, no further specialist palaeontological studies or mitigation are recommended for the PV solar projects and the associated grid connection;
- Ancient alluvial gravels (possibly calcretised) associated with Pleistocene or older fossil remains (e.g. mammalian bones and teeth) might be exposed in the existing borrow pit in the Koa River Palaeovalley area in the south-eastern portion of the Remaining Extent of the Farm Bloemhoek 61 (yellow circle in Fig. 2). If it is proposed to exploit alluvial gravel material from this pit as part of the PV solar facilities, a site inspection by a professional palaeontologist before excavations commence is recommended;



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Page No: 3

- These recommendations should be incorporated into the Environmental Management Programme (EMPr) for the proposed solar PV facilities and associated grid connection solutions.

Additional recommendations provided in the Environmental Management Programme (EMPr) on page 54 and 55 of the document are noted.

## Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The following specific conditions apply to the development:
  - i) – If the alluvial material referred to in the Palaeontological report is used, a site inspection by a qualified palaeontologist must be conducted. A report detailing this site inspection must be submitted to SAHRA for comment;
  - ii) – If the layout of the development is amended, an archaeologist must be contacted to provide an assessment of the altered layout. A report/letter detailing the results of the assessment of the new layout must be provided to SAHRA for comment;
- 38(4)c(i) – 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 as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – 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 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
  - i) – If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as

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Page No: 4

possible to inspect the heritage resource. 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 Final BAR and EMPr must be uploaded to the SAHRIS application for record purposes;
- 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

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/522853>  
(DEA, Ref: )

Terms & Conditions:

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Page No: 5

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.