



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 15270

Date: Tuesday August 18, 2020
Page No: 1

Final Comment

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

Attention: Cape Environmental Assessment Practitioners

PO Box 2070
George
6530

Bushmanland PV

Cape EAPrac has been appointed by Bushmanland PV (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Bushmanland PV on RE Farm Geel Kop Farm No. 456, near Upington, Northern Cape Province.

A draft Basic Assessment Report (dBAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed infrastructure will include solar panels, on-site substation, internal access roads, laydown area, auxiliary buildings, battery storage, inverter stations, electrified perimeter fencing and security infrastructure. The total extent of the development area will be 220 ha. The proposed development is located within Focus Area 7 of the Renewable Energy Development Zones i.e. the Upington REDZ.

The DBAR notes that the Public Review period is between 6 July 2020 to 6 August 2020. It must be noted that the SAHRIS case was created on the 18/07/2020, therefore in terms of NEMA EIA Regulations section 3, the SAHRA review period will end on the 18/08/2020.

Prof Marion Bamford and Heritage Contracts and Archaeological Consulting had been appointed to provide heritage specialist input as part of the BAR process as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Bamford, M. 2020. Palaeontological Impact Assessment for the proposed Bushmanland PV project on Remaining Extent of Farm Geel Kop 456, SW of Upington, Northern Cape Province (Project No: Geelkop 1) Desktop Study (Phase 1).

The proposed development area is underlain by volcanic rocks of the Vyfbeker Metamorphic Suite that do not



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Page No: 2

contain fossils. Gordonia Formations overly these rocks that may contain recent Quaternary fossils in pan or spring deposits. A Chance Fossil Finds Procedure is recommended and provided in the report.

Van der Walt, J. 2020. Heritage Impact Assessment Bushmanland PV Project, Upington, Northern Cape Province.

A total of 26 heritage resources including isolated surface scatters of Middle Stone Age and Later Stone Age lithics within exposed calcretes areas and one historical mining exploration trench were identified in the study area. All identified heritage resources were rated as having a low significance rating. While the direct impact on the heritage resources has been assessed as low, the cumulative impact has been assessed as a medium significance level of impact, as several other similar projects have been proposed for the area.

The recommendations provided in the HIA include the following:

- In order to mitigate the cumulative impact with regards to the loss of widely scattered low-density Stone Age lithics it is recommended that a surface sample of the artefacts should be analysed in the field to accurately describe the typology of the various lithic industries prior to construction;
- Development of a heritage management plan for the entire Geel Kop Farm RE456 prior to construction;
- Implementation of a chance find procedure for both the archaeological and palaeontological components.

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 recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
- A permit in terms of section 35 of the NHRA and Chapter II and IV of the NHRA regulations must be applied for if the EA is granted for the proposed development and before construction occurs, in order



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Page No: 3

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to collect a representative sample of Stone Age lithics from the affected area;

- The Heritage Management Plan must be submitted to SAHRA for comment prior to the construction phase;
- 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 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;
- As the SAHRA case was only created on the 18/07/2020, in terms of Section 3 of the NEMA EIA regulations, SAHRA commenting period ends on the 18/08/2020. The Final BAR should not be submitted for decision making process to the competent authority without integrating SAHRA comment as per section 38(8) of the NHRA;
- The Final BAR and EMPr must be submitted to SAHRA 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

Our Ref:



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Page No: 4

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/538094>

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.