



an agency of the  
Department of Arts and Culture

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CaseID: 15332

Date: Tuesday October 13, 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: Geelstert Solar Facility 1 (Pty) Ltd

**The development of two (2) separate solar photovoltaic (PV) facilities, each with a contracted capacity of up to 125MW. The facilities will be connected to the Aggeneis MTS via a collector substation and an overhead power line with capacity of up to 200kV.**

Savannah Environmental (Pty) Ltd has been appointed by Geelstert Solar Facility 1 (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Geelstert 1 PV Facility, near Aggeneys, 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, centralized inverter stations or string inverters, temporary laydown area, cabling between panels (underground where practical), on-site substation, access road, internal access roads, operation and maintenance building with gate house, security building, control centre, offices, warehouse, workshop and a visitors centre within an application area of 245 ha. The proposed development is located within the Springbok Renewable Energy Development Zone (REDZ).

CTS Heritage have 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). It is noted that the proposed development is located within an area of low sensitivity for palaeontological resources as per the SAHRIS PalaeoSensitivity map, and therefore no further assessment of the impact to palaeontological resources is required.

*Lavin, J. 2020. Heritage Screener: Proposed Development of Geelstert 1 Solar PV Facility on the remaining extent of the farm Bloemhoek 61 near Aggeneys in the Northern Cape.*

The results of the report are based on desktop sources only. Previous surveys in the adjacent areas did not identify significant heritage resources. The specialist concluded that no significant heritage resources would be negatively impacted by the proposed development.



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Recommendations provided in the report include the following:

- A person must be trained as a site monitor to report any archaeological sites found during the development. Construction managers/foremen and/or the Environmental Control Officer (ECO) should be informed before construction starts on the possible types of heritage sites and cultural material they may encounter and the procedures to follow when they find sites;
- A Chance Finds Procedure and a Fossil Finds Protocol are recommended to be followed.

In an Interim Comment issued on the 19/09/2020, SAHRA stated that the Letter of Exemption for further assessment of heritage resources could not be accepted as the proposed development area has not been previously disturbed and the visual impact of the proposed development on the heritage resources has not been conducted.

SAHRA furthermore requested that a field-based HIA must be conducted, inclusive of an assessment of the visual impact of the development on the Gamsberg and Namiesberg massacre sites.

A response by the heritage specialist was submitted to the Heritage Report file stating that the submitted study was not based on desktop research, requesting clarity on the comment, and sought a way forward.

In an Interim Comment issued on the 02/10/2020, SAHRA noted the contents of the submitted response letter, however, reiterated the requirements for a field-based assessment and the inclusion of an assessment of the visual impact on the Gamsberg and Namiesberg massacre sites.

In a second response letter, which was also shared with the case officer from the Department of Environment, Forestry and Fisheries (DEFF) as the deciding authority, the heritage specialist further motivated that there was no need to undertake a field-based assessment due to the previous studies conducted within the area.

### Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has previously requested that a field-based survey be undertaken to effectively assess the impact of the proposed development on heritage resources that may be located within the proposed development footprint, in addition to assessment of the visual impact on the Gamsberg and Namiesberg massacre sites. This has not been completed and SAHRA is of the view that the assessment of the impact to heritage resources is incomplete.

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Therefore, in terms of section 38(4)a of the NHRA, SAHRA cannot endorse this proposed development and advises the Department of Environment, Forestry and Fisheries (DEFF) to reject the EA application for the proposed Geelstert 1 PV Facility, near Aggeneys, Northern Cape Province, as no HIA that complies with section 38(3) as required by section 38(8) of the NHRA and section 24(4)b(iii) of the NEMA has been completed as part of the EA application.

This comment must be forwarded directly to the competent authority and proof of the submission and receipt thereof must be provided to SAHRA.

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

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/538562>  
(DEA, Ref: )

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