



an agency of the
Department of Arts and Culture

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CaseID: 15395

Date: Tuesday November 17, 2020
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Final Comment

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

Attention: ABO Wind Renewable Energies (Pty) Ltd

The development of a grid connection infrastructure to connect the proposed Geelstert 1 and Geelstert 2 solar PV facilities to Aggeneis Main Transmission, Northern Cape Province.

Savannah Environmental (Pty) Ltd had been appointed by ABO Wind Renewable Energies (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Geelstert Grid Connection, near Aggeneys, Northern Cape Province.

SAHRA has issued previous comments on this case and only the Final Comment will be reiterated here. In the Final Comment issued on the 13/10/2020, SAHRA noted that the previously requested field-based survey had not been completed and SAHRA was of the view that the assessment of the impact to heritage resources was incomplete.

Therefore, in terms of section 38(4)a of the National Heritage Resources Act, Act 25 of 1999 (NHRA), SAHRA stated that SAHRA could not endorse the proposed development and advised the Department of Environment, Forestry and Fisheries (DEFF) to reject the EA application for the proposed Geelstert Grid Connection, near Aggeneys, Northern Cape Province, as no Heritage Impact Assessment (HIA) that complies with section 38(3) as required by section 38(8) of the NHRA and section 24(4)b(iii) of the National Environmental Management Act, Act 107 of 1998 (NEMA) had been completed as part of the EA application.

Since the issuing of the Final Comment, a field-based HIA has been submitted for review along with the Final Basic Assessment Report (FBAR) (10/11/2020).

Lavin, J. Heritage Impact Assessment in terms of section 38(8) of the NHRA: Proposed Development of a grid connection for the proposed Geelstert 1 and Geelstert 2 Solar PV facilities on a site 11 km south-east of Aggeneys in the Northern Cape Province.

No heritage resources were identified within the proposed development footprint. The proposed development is unlikely to be highly obvious from the Namiesberg massacre site due to the distance from the site, while the proposed development will be visible from the Gamsberg massacre site. The proposed development will be



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largely screened from the Gamsberg massacre site by other existing solar projects and the impact already in place due to the mining activities in the region. The proposed development will not block the view of both massacre sites from accessible public view points.

Recommendations provided in the report include the following:

- No mitigation is required prior to construction operations commencing.
- Should 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 be found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted.
- If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. A professional archaeologist must be contracted as soon as possible to inspect the findings. A Phase 2 rescue excavation operation may be required subject to permits issued by SAHRA.
- The above recommendations must be included in the Environmental Management Plan (EMP) for the project.

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 EMP:

- 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. No further additional specific conditions are provided for the development;
- 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;

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- 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 Final BAR and EMPr have been finalised, this comment must be forwarded directly to the competent authority for their consideration as part of the decision-making process. Proof of the delivery and receipt thereof 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

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/539149>
(DEA, Ref:)

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.