



an agency of the  
Department of Arts and Culture

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CaseID: 15395

Date: Friday October 02, 2020  
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## Interim Comment

### In terms of Section 38(3), 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 has 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.

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 a double-circuit power line (up to 220kV in capacity) and a single circuit powerline (up to 220kV in capacity). A corridor of 17.5 km long and 1 km wide has been assessed. Associated infrastructure will include a new collector substation with a development footprint of 1.25 ha and a new 6 m wide access road.

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 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.*

*Geelstert 2 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 proposed route and 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.

It must be noted that the powerline route has not been surveyed in previously studies in its entirety and several previously identified heritage resources have not been noted in the above submitted report.

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 had not been previously surveyed sufficiently 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.

### **Interim Comment**

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit notes that no application specific field-assessment was conducted as part of the impact to heritage resources, and therefore the submitted assessment is based on the results of other reports via a desktop search.

SAHRA notes the previous assessments in the area, and while these reports can contribute to providing context and insight into the significance of any heritage identified within the area, they do not replace the application specific field-based assessment required to effectively assess the impacts of the current development on heritage resources that may occur within the impact area. To clarify the previously issued comment, “the proposed development area had not been previously surveyed sufficiently” in terms of this application and impact footprint.

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SAHRA will re-iterate the previously issued comment for consistency:

- *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. The results of the conducted VIA as noted in the response letter may be used in this case, but they must be integrated into the HIA;*
- *SAHRA advises the applicant to extend the EA process in terms of section 19(1)b of the EIA regulations in order to comply with this comment;*
- *Further comments will be issued upon receipt of the above.*

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/539149>  
(DEA, Ref: )

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