

Our Ref:



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: 16165

Date: Tuesday March 30, 2021  
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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: Bloemsmond Grid (Pty) Ltd

**Bloemsmond Grid (Pty) Ltd, a Special Purpose Vehicle (SPV), proposes the construction and operation of grid connection infrastructure for the five proposed Bloemsmond solar PV facilities near Upington in the Northern Cape Province. The Basic Assessment Report (BAR) considers and assesses a joint grid solution required to evacuate power from the following Renewable Energy Projects: • AEP Bloemsmond Solar 1 (Authorised - 14/12/16/3/3/2/814) • AEP Bloemsmond Solar 2 (Authorised - 14/12/16/3/3/2/816) • Bloemsmond 3 (Authorised - 14/12/16/3/3/1/2042) • Bloemsmond 4 (Authorised - 14/12/16/3/3/1/2044) • Bloemsmond 5 (Authorised - 14/12/16/3/3/1/2043)**

Cape EAPrac has been appointed by Bloemsmond Grid (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Grid Connection for the five Bloemsmond Solar Facilities on several farm portions near Upington, Northern Cape Province (DEFF Reference: 14/12/16/3/3/1/2107).

A draft Basic Assessment Report (BAR) Report has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include three substations, one collector substation, four powerlines and laydown areas.

Natura Viva CC and Heritage Contracts and Archaeological Consulting (HCAC) were appointed to provide heritage specialist input as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Almond, J. E. 2019. Recommended Exemption from further Palaeontological Studies: Proposed Bloemsmond 3, Bloemsmond 4 and Bloemsmond 5 Solar PV Facilities on Portions 5 and 14 of the Farm Bloemsmond 455 near Upington and their connection to the National Grid via the Upington Main Transmission Substation, ZF Mgcawu District Municipality, Northern Cape.*

\*Only the results of the grid assessment will be discussed below.

The proposed development area is underlain by unfossiliferous Precambrian basement rocks and Late

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Caenozoic windblown sands, calcretes and alluvial deposits of low to very low palaeontological sensitivity. The impact significance of the development is low and a Chance Fossil Finds Procedure is recommended to be implemented and is provided in the report.

*Van der Walt, J. 2019. Heritage Impact Assessment (Required under Section 38(8) of the NHRA (No. 25 of 1999) for the Bloemsmond Solar PV Facilities Grid Connection, Upington, Northern Cape Province.*

Several Stone Age, historical finds spots, historical foundations and tungsten trenching of low heritage significance were identified within the grid corridors. One Stone Age site of medium significance (B3/3) was identified within the grid connection and will be impacted.

Recommendations provided in the report include the following:

- The impact to site B3/3 can be mitigated by micro citing to avoid the site with a 30 m buffer;
- The final alignment must be subjected to a walk down prior to development;
- A chance find procedure must be implemented for the project as outlined in Section 10.1 of the report.

The Visual Impact Assessment conducted as part of the DBAR states that Visual Exposure and Sensitivity to landscape change for both preferred routing sites is defined as Low. The HIA notes that the greater study area is characterised by agricultural development and adjacent renewable energy development and the project will not impact on significant viewsapes.

It must be noted that the results of the HIA do not correlate to the summary of the HIA in the DBAR.

## 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:
- Should it not be possible to avoid impacts to site B3/3, a permit in terms of section 35 of the NHRA and

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Chapter II and IV must be applied for from SAHRA. No mitigation measures may commence without a permit issued in this regard;

- The Final BAR must include the correct summary of the results of the HIA as discussed above, including mitigation measures provided by the specialists;
- The walkdown report must be submitted to SAHRA for comment prior to construction. No construction activities may commence without comments from SAHRA in this regard;
- 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 above;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
- With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above;
- 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;
- 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  
Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/561112>  
(DEA, Ref: 14/12/16/3/3/1/2107)

**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.