



## Interim Comment

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

Attention: Eskom Holdings SOC Ltd  
P.O. Box 8610  
Johannesburg  
200

**Eskom Holdings SoC Limited (Eskom) proposes to construct and operate a Solar Photovoltaic (PV) facility with a capacity of less than 20MW, with a footprint under 20ha at the existing Eskom Grootvlei Power Station, Rietfontein 458 IR, in Mpumalanga.**

Fourie, W. October 2012. *Eskom Groovlei PV Heritage Impact Assessment*

Thank you for submitting the Final Basic Assessment Report and associated Heritage Impact Assessment for the proposed development of the Eskom Grootvlei Solar PV power generation facility. It is noted that the proposed development will cover approximately 17ha and is planned to yield approximately 10MW of power. The proposed development is planned for an area previously impacted by the development of a power station in 1969. Four alternative areas are proposed for development, and according to the Final BAR, Area 1 is preferred.

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999), any proposed development that requires an application in terms of NEMA or the MPRDA must have an assessment of impacts to heritage resources completed as part of the application process. The relevant heritage authority must determine whether the assessment done in terms of impacts to heritage resources satisfies our requirements and must provide comments or recommendations to the decision-making authority.

It is noted that although the HIA was completed in October 2012, it was only submitted to SAHRA Head Office on 31 January 2014. The submitted Heritage Impact Assessment identified no heritage resources on alternatives Area 1, Area 2 and Area 3. Five sites of some heritage significance were identified in Area 4. These heritage resources include a municipal cemetery of moderate heritage significance, stone foundations of unknown heritage significance, the foundations of a red clay brick structure, the ruins of a red clay brick structure as well as a red clay brick building of low heritage significance.

It is noted that the HIA does not contain track paths however this is understandable as it was completed in 2012. It is also noted that no historical investigation was carried out with regard to the possible origin of the stone foundations and the likelihood of these foundations being associated with historical archaeological material.

In addition, although titled as a Heritage Impact Assessment, the report deals only with archaeological heritage. No assessment of impacts to palaeontological heritage is provided. The area proposed for development is situated within the Vryheid Formation of the Eccca Group. This formation is known for its rich fossil plant assemblages of the Permian *Glossopteris* Flora (lycopods, rare ferns and horsetails, abundant



glossopterids, cordaitaleans, conifers, ginkgoaleans), rare fossil wood and diverse palynomorphs. Abundant, low diversity trace fossils, rare insects, possible conchostracans, non-marine bivalves and fish scales have been identified within this formation. It is therefore likely that very significant palaeontological heritage will be impacted by the proposed development.

### Interim Comment

SAHRA is unable to issue a final comment on the proposed development as further information is required.

Please submit a palaeontological impact assessment that assesses the impact of the proposed development on significant palaeontological resources. This assessment must contain a field assessment by a qualified palaeontologist and must include a protocol for finds.

Should Area 4 be selected for development, the following conditions apply;

- The cemetery may not be impacted by the proposed development and an additional 5m buffer from the existing steel fence.
- Research into the historical background of the area must be conducted to determine the origins of the stone foundations and the likelihood of association with historical archaeological material.

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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Jenna Lavin  
Heritage Officer  
South African Heritage Resources Agency



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SAHRA Head Archaeologist  
South African Heritage Resources Agency

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an agency of the  
Department of Arts and Culture

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/155255>

Edit view (DEA, Ref: 14/12/16/3/3/1/669 )



The South African Heritage Resources Agency

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