



## Interim Comment

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

Attention: Ms Umeshree Naicker  
Savannah Environmental (Pty) Ltd  
PO Box 148  
Sunninghill  
2157

### PROPOSED ALLDAYS SOLAR FACILITY PHOTOVOLTAIC (PV)/ CONCENTRATED PHOTOVOLTAIC (CPV) SOLAR ENERGY FACILITY – PHASE 1(75MW), LIMPOPO PROVINCE

*Gaigher, S. Proposed establishment of the Alldays (up to 100 MW) Photovoltaic Solar Generation Plant on the Farm Gotha near Alldays in the Limpopo Province.*

Biotherm Energy (Pty) Ltd. proposes a 75MW solar facility on the farm 102 Gotha MS, near Alldays, Limpopo Province. The proposed footprint of the solar farm is 175 hectares and will require among other things a new on-site substation to connect via a loop-in loop-out to the Soutpan/Venetia 1 132Kv power line to evacuate the power from the facility into the Eskom Grid. The proposed solar farm is situated adjacent the Venetia Diamond Mine.

The proposed project is situated within 3km of the Mapungubwe Cultural Landscape World Heritage Site Buffer Zone. Considering the significance of this cultural landscape, SAHRA, in an Interim Comment dated 20/06/2013, requested that the Heritage Report be revised. SAHRA specifically requested the following information:

- 1. Provide a comprehensive assessment of the importance of the Mapungubwe Cultural Landscape;*
- 2. A proper indication of the types and ranges of heritage resources likely to be encountered drawing on any research that has been undertaken;*
- 2. Previous heritage surveys undertaken in the area and a discussion of the results if these are available;*
- 3. How the development will impact on the integrity and authenticity of Mapungubwe Cultural Landscape and any mitigation strategies;*
- 4. It is recommended that the project area should be resurveyed with a clear explanation of the survey methodology and GPS track paths. Considering the significance of the project area it is highly recommended that survey should be conducted by a team of qualified heritage practitioners.*

SAHRA notes the following issues with the revised HIA submitted in support of the Alldays Solar project:

1. Most of the section titled 'Heritage Indicators within the receiving Environment Regional Cultural Context' has been taken verbatim from sources not referenced. The Stone Age section is taken verbatim from an MSc





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thesis p. 6-7 (Kempson, H. 2007. Late Earlier Stone Age sites in the Mapungubwe National Park, South Africa: A Technological Study). The Iron Age section is taken verbatim from an article by Andrie Meyer (Meyer, A. 2000. K2 and Mapungubwe. Goodwin Series, Vol. 8, African Naissance: The Limpopo Valley 1000 Years Ago, pp. 4-13.)

2. In addition, the section titled 'The Mapungubwe Cultural Landscape' was taken verbatim from the Mapungubwe World Heritage Site Nomination Dossier, and this text extends to nearly eighteen pages. Although the report author references the source of the text, this is not acceptable practice. The section 'The Historic Era' was also taken verbatim from the Nomination Dossier.

## **Decision**

The report submitted is therefore rejected based on the following reasons:

- a) The use of work that is not the author's own, without proper citation, amounts to plagiarism.
- b) The author shows no understanding of the significance and importance of the Mapungubwe Cultural Landscape, since he fails to critically interpret and engage with the reference material.
- c) Considering the significance of the Mapungubwe Cultural Landscape, SAHRA will only comment on this project once a new Heritage Impact Assessment that provides original content is submitted.

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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Phillip Hine  
Heritage Officer

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Colette Scheermeyer  
SAHRA Head Archaeologist  
South African Heritage Resources Agency





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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/59019>  
(DEA, Ref: 14/12/16/3/3/2/329)

