



05 October 2020

Thulisile Nyalunga
Directorate: Integrated Environmental Authorisations
Sub-directorate: National and Public Sector

Department of Environmental Affairs
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Phillip Hine & Natasha Higgitt
Manager: APM
South African Heritage Resources Agency (SAHRA)
111 Harrington Street
Cape Town
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Dear Ms Nyalunga, Mr Hine & Ms Higgitt,

**RE CASES 15332, 15333 AND 15395
PROPOSED DEVELOPMENT OF GEELSTERT 1 AND 2 SOLAR PV FACILITIES ON THE REMAINING
EXTENT OF THE FARM BLOEMHOEK 61 NEAR AGGENEYS AND ASSOCIATED GRID CONNECTION
INFRASTRUCTURE IN THE NORTHERN CAPE**

IN REFERENCE TO LATEST INTERIM COMMENT DATED 02 OCTOBER 2020

We recently received notice about the latest comment made by Ms Higgitt, the case officer handling this case on SAHRIS for the heritage component of the above application. Ms Higgitt reiterated the request for a field assessment as part of the heritage compliance process:

“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”

We are in the process of integrating the findings of the VIA into the heritage assessment conducted to date.

This latest interim comment followed a letter from CTS (also attached) pointing out the the heritage screening assessment was based not only on desktop studies (such as the palaeontological screening tool on SAHRIS) but also on actual fieldwork which has extensively been carried out in this particular area by both David Morris and Jayson Orton. The reasoning calling for a new field assessment in the interim comment is that:

“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.”

This comment is introducing ambiguity to a hitherto undisputed understanding about the meaning of “field based” versus “desktop” assessments of heritage resources. CTS Heritage has never claimed that the heritage screening assessments are field-based assessments but it has always made it clear whether previous, on the ground fieldwork, has been taken into account in



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the screening of recorded sites and potential heritage sensitivities. In this particular case, as stated in the screening assessment, extensive, high quality fieldwork has taken place. It is our argument that this application does not need further fieldwork to take place as the previous field assessments have more than adequately accounted for the heritage resources that will be impacted by this proposed development. In other developments and areas where no previous fieldwork has been completed, the term “desktop only” assessment is appropriate. These studies typically extrapolate the kinds of heritage resources one would expect in an area such as the likelihood of encountering shell middens within a certain distance from the coastline or where open site scatters of Early, Middle and Later Stone Age artefacts or shelters containing rock paintings are likely to be found. This is not the case for this application where a number of field studies have been conducted.

Recently, the same office approved a desktop assessment of heritage resources for the proposed Koa South Prospecting Right application.

Kitto, J. 2020. Heritage Impact Assessment: Koa South Prospecting Right Application for Black Mountain Mining, Northern Cape Province
<https://sahris.sahra.org.za/node/538801>

We agree with the findings made by PGS Heritage and the final comment made by SAHRA approving the desktop assessment of the heritage impacts of the proposed development. There has therefore been no change in policy requiring automatic and mandatory field-based assessments for all developments, regardless of expected impact or previous work interpreted by professional, informed and qualified heritage practitioners.

We therefore urge SAHRA’s APM to reconsider the requirement for a field-based assessment for the proposed development of the Geelstert solar PV facility. The quality of the fieldwork conducted previously was high and the recorded and anticipated heritage sensitivity is very low. We feel it is imperative that we are taking previous studies into account before asking for more fieldwork. This is also consistent with the aims and objectives of the DEA Screening Tool, the SAHRIS Palaeosensitivity Map and the accumulation of the archive of recorded heritage sites and reports contained in SAHRIS.

Yours faithfully,

Nicholas Wiltshire
Director, CTS Heritage