



21 September 2020

Ms N. Higgitt  
Heritage Officer: APM  
South African Heritage Resources Agency (SAHRA)  
111 Harrington Street  
Cape Town  
8000

Dear 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**

Many thanks for your correspondence on the above matters dated 19 September 2020. In support of each of the above applications made to SAHRA in terms of section 38(8) of the NHRA, Savannah Environmental Consultants submitted a Desktop Heritage Screening Assessment for each application as well as the Basic Assessment documents.

These documents were assessed by SAHRA and comments issued accordingly. In the comments issued on these cases, it is stated that “The results of the report are based on desktop sources only”. This is not the case.

As per the text in section 8 and the list of references included in Appendix 2, the results of the report are based on the outcomes of a number of recent and thorough field assessments conducted by experienced heritage practitioners including:

- Morris (2013) - SAHRIS NID 15934 - Survey conducted that covered the areas under assessment. HIA approved by SAHRA (Case 4759)
- Orton (2019) - SAHRIS NID 523680 - Survey conducted that covered the areas under assessment. HIA approved by SAHRA (Case 13730, 13731, 13728, 13729)

The findings from these previous field assessments that covered the areas in question are mapped relative to the proposed developments (Figure 2 and Figure 3) in the Desktop Heritage Screening Assessments. In addition, the findings of these previously conducted field assessments are summarised in the the text included in Section 8 which states that:

“As per the findings of Morris (2013), it is predicted that “features such as rock outcrops or the immediate footslopes of hills might be places where Stone Age and probably also colonial era traces would occur, if present. Previous experience has shown that the flat plains away from such features are almost entirely bereft of heritage traces. The dunes may also have been a focus of past human activity.”

Furthermore, the area immediately adjacent to the area proposed for development in this application was assessed by Orton (2019, SAHRIS NID 523679, 522885 and 523680). Orton (2019) identified no heritage resources within the proposed footprint, although several isolated stone artefacts attributable to background scatter were noted.

As such, based on the location of the proposed development area in the flat plains and the fact that no known heritage resources have been identified within the development footprint (despite



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the completion of a foot survey by Morris (2013), it is very unlikely that the proposed development will impact on significant archaeological resources.” (emphasis added).

In addition to the above, the Desktop Heritage Screening Assessment also summarises likely impacts to other kinds of heritage resources including impacts to the cultural landscape and built environment and to palaeontological heritage.

Despite this, SAHRA does not agree with the outcomes of the Desktop Heritage Screening Assessment and states that:

“The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot accept the Letter of Exemption for further assessment of heritage resources as the proposed development area has not been previously disturbed and the visual impact of the proposed development on the heritage resources has not been conducted.

A field-based HIA must be conducted, inclusive of an assessment of the visual impact of the development on the Gamsberg and Namiesberg massacre site”.

As such, we kindly request clarity regarding the adequacy of the field assessments conducted by Morris (2013) and Orton (2019) for this area, and referenced in the screening assessment, in terms of identifying the location of heritage resources in and around the proposed development area. It is our stated opinion that as these areas have been thoroughly previously assessed for impacts to heritage resources that no new field assessment reviewing the same areas would be necessary. Please advise in this regard?

In terms of the anticipated visual impacts identified by SAHRA, it is noted that the approved (by SAHRA) Aggeney's 1 and 2 PV Facilities (SAHRIS Cases 13728, 13729) are located in between the proposed Geelstert PV Facilities and the Gamsberg and Namiesberg massacre sites. We would further like to note that a VIA was conducted for these proposed developments and is attached to each case as part of the BA documents submitted to SAHRA.

The proposed developments are located between 2km and 3km from the Gamsberg Mountains. The VIA states that:

“the proposed PV array could be visible intermittently over approximately 5.0km of the road at a distance of approximately 5.1km. The proposed array forming the bulk of the development is relatively low not exceeding 3.5m in height. Whilst this could be visible for up to 6.7km the array will be seen in profile as a dark line on the horizon which will start to visually blend with the background around 2.7km from the development. Taller electrical infrastructure is likely to be visible over a similar section of the road and at the same distance. It is however not likely to be highly obvious. No high level overview of the project is possible.

Therefore, whilst the development is likely to be visible from a short section of the N14, it is highly unlikely to be obvious. It also needs to be understood that the section of the N14 in question is located within an area where the landscape character is heavily influenced by development. This influence is likely to increase due to expanding mining operations and the possibility that other solar projects are likely to be obvious from this section of the road. An intermittent view of the proposed project that is unlikely to be obvious will therefore not change the character of the view from the road in any significant way.” (emphasis added)



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Please advise if you would like us to integrate the findings of the VIA into the Desktop Heritage Screening Assessment? We look forward to your urgent response as we would like to assist in resolving any outstanding concerns SAHRA may have as soon as possible.

Yours faithfully,

**Nicholas Wiltshire**  
**Director, CTS Heritage**