

Proposed Development of the 240MW Bethel Solar PV Facility near Banderlierkop in the Limpopo Province



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Nokusho Ngobeni
Tel:
Email: nngobeni@sahra.org.za
Case ID: 25892

Date: Thursday, 29 January, 2026

Final Comment

In terms of Section 38(4) of the National Heritage Resources Act (Act 25 of 1999)/In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Andrew Pearson
Bethel Solar PV (Pty) Ltd
21st Floor, Portside,
5 Buitengracht Street,
Cape Town,
8001

Cape EAPrac has been appointed by Bethel Solar PV (Pty) Ltd, hereafter referred to as the Applicant, as the independent Environmental Assessment Practitioner (EAP), to facilitate the Scoping and Environmental Impact Reporting process required in terms of the National Environmental Management Act (NEMA, Act 107 of 1998) for the proposed development of the Bethel Solar PV and associated infrastructure, (hereafter referred to as Bethel Solar PV) on Farm 431 and the Remainder of Farm 466 located South of Louis Trichardt in the Makhado Local Municipality, Vhembe District, Limpopo Province.

This case (Case ID 25892, [Proposed Development of the 240MW Bethel Solar PV Facility near Banderlierkop in the Limpopo Province | SAHRIS](#)) is linked to Case ID's 25893 ([Proposed Development of the 240MW Draailoop Solar PV Energy Facility near Banderlierkop in the Limpopo Province | SAHRIS](#)), 25894 ([Proposed Development of the 240MW Klipput Solar PV Energy Facility near Banderlierkop in the Limpopo Province | SAHRIS](#)) and 25895 ([Proposed Development of the 75MW Makoppa Solar PV Facility near Banderlierkop in the Limpopo Province | SAHRIS](#)).

A Final Environmental Impact Assessment Report (FEIAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The project will consist of a PV Facility and associated infrastructure, including Battery Energy Storage System (BESS) and Electrical Grid Connection Infrastructure (EGI). The total generation capacity of the PV facility will be up to 240MW. Both the PV and BESS facilities will input into the national Eskom grid via the existing Eskom Tabor Substation situated approximately 10km to the East of the proposed PV facility.

CTS Heritage has been appointed to provide heritage specialist input as part of the EIA process as required by



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section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Lavin, J., Wiltshire, N & Crafford, M. 2025. HERITAGE IMPACT ASSESSMENT In terms of Section 38(8) of the NHRA for the Proposed Development of the 240MW Bethel Solar PV Facility near Banderlierkop in the Limpopo Province

A number of burial grounds and graves were identified (Sites 009-falls within the proposed PV area, 025, 037 and 038). These burials range from historic to recent and are all located outside of municipal cemeteries. Due to their high levels of local social and spiritual significance, burials have high levels of local cultural value and are graded IIIA. It is recommended that a no development buffer of 100m is implemented around such burials in order to retain their sense of place as well as to ensure that no associated unmarked human remains are accidentally impacted by development activities.

A rock shelters with associated buried archaeological deposit and rock art (Site 011 and 044, graded IIIA) as well as scatters of Iron Age pottery shards (Sites 012 and 016, Graded IIIC) were identified. The field assessment also identified one historic stone-walled kraal (Site 041). This site has been graded IIIB.

Historical graveyards related to the families at Draailoop and Klipput were recorded with separate graves and ruined dwellings at Bethel and Klipput for farmworkers and their relatives. It was surprising to see relatively low artefact counts but later checks through the historical satellite imagery showed the large number of previously ploughed fields in the PV areas which are now fallow for the game farming and hunting businesses. This explains the highly disturbed and unnaturally level ground present across much of the PV areas.

The Visual SSVR determines that the Scenic Quality of the development area is rated as Medium to High. The undulating bushveld landscape does have value due to its extensive coverage without development or transformation by agriculture or human settlement. The terrain is primarily gently undulating, with a small ridgeline in the northern areas and a rocky outcrop in the southern portion of the property. The landscape maintains its value largely because it remains undeveloped by agriculture or settlements. Aside from the Eskom OHPL corridor, which shows some signs of landscape degradation, structural developments are characterized as rural, agricultural, or game farm-related, and are non-imposing. The Visual SSVR concludes that the majority of the property is suitable for PV development and with the incorporation of the recommended setbacks and No-Go areas, would not result in degradation of significant landscape / visual resources. As such, the project is not defined as a Fatal Flaw. The visual impacts of the proposed development are more



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thoroughly assessed in the VIA

According to the SAHRIS Palaeosensitivity Map the development sites are underlain by sediments of very LOW fossil sensitivity. The proposed development is underlain with Matok Granite (Coarse-grained, porphyritic, pink and grey biotite granite, in places hornblende granite), and Goudplaats-Hout River Gneiss (Leucocratic, strongly migmatised biotite gneiss and greyish, weakly migmatised biotite gneiss; minor leucogneiss and dark grey biotite gneiss). Both these formations have Insignificant or Zero Palaeontological sensitivity. The third formation that is present in the study area is the Bandelierkop Formation Predominantly volcanic igneous rocks, plus some igneous intrusions, minor sediments such as banded iron formation, chert, quartzite, conglomerate, and schists) which has Low Palaeontological Sensitivity.

It is unlikely that the proposed development will have a significant impact on palaeontological resources, and no further assessments are required.

Recommendations

- The mitigation measures outlined in Table 2 above are implemented. This is adhered to in the layout provided
- The granite koppies within the development area are considered to be sensitive and are excluded from the development footprint. This is adhered to in the layout provided
- A Conservation Management Plan is drafted for the ongoing conservation of the significant archaeological sites and burials identified within the area proposed for development
- Although all possible care has been taken to identify sites of cultural importance during the investigation of the study area, it is always possible that hidden or subsurface sites could be overlooked during the assessment. 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, burials or other categories of heritage resources are found during the proposed development, work must cease in the vicinity of the find and SAHRA must be alerted immediately to determine an appropriate way forward.

Comments and Responses report

A community engagement was conducted with Chatleka Community Property Association (CPA) who objected to the HIA report noting that the following:

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- Failure to Assess Living Cultural Landscape
- Omission of Ancestral Graves and Sites
- Procedural Flaws and Exclusion
- HIA Recommendations are Insufficient

Therefore, it was recommended that the CPA engage with an appropriate academic institution urgently to ensure that this oral history is accurately recorded and documented through an academic process. The CPA has identified burials and spaces within the area proposed for development as associated with their living heritage. In lieu of specific location information from the CPA, additional research was undertaken to identify places that have or may have cultural heritage value. An additional site visit was also undertaken to ground-truth the identified sites. The results of this analysis are included in the updated HIA. These additional heritage sites along with the appropriate buffers provided by the heritage specialist were used to inform the layout. Layout Alternative 4 (Mitigated Preferred Layout) avoids all of the identified heritage features.

It is recommended that the property owner and developer sign a Heritage Agreement with a Conservation Management Plan (CMP) for the ongoing conservation of the significant archaeological sites and burials identified within the area proposed for development. The recommendation for a CMP for the identified features must be endorsed by SAHRA before the CMP is drafted and a Heritage Agreement is signed. As such, the process for the heritage agreement and CMP must be initiated only if Environmental Authorisation is granted for the project

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 EIA and EMP:

- 38(4)a – The SAHRA Development Application Unit (DAU) has no objections to the proposed development.
- 38(4)b – The recommendations provided by the heritage specialists are supported and must be adhered to. Further additional conditions include the following:
 - A no development buffer of 100m is implemented around burial grounds and graves (Sites 009, 025, 037 and 038).
 - If it is not possible to avoid the burial sites, a stakeholder engagement process must be undertaken in terms of section 36 of the NHRA and Chapter XI of the NHRA 2000 Regulations, to obtain permission



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to fence or relocate the graves;

- Should relocation of the graves be found feasible an archaeologist must be appointed to apply to LIHRA for a section 36 permit application in terms of chapter IX of the NHRA 2000 Regulations for the relocation of graves older than 60 years;
- A Conservation Management Plan will have to be drafted and implemented as part of the development and submitted to SAHRA for approval.
- A 50m buffer around the rock shelters with associated buried archaeological deposit and rock art (Site 011 and 044) must be implemented.
- If it is not possible to avoid the rock shelters a mitigation permit must be applied for from SAHRA.
- A 50m buffer around the scatters of Iron Age pottery shards (Sites 012 and 016) must be implemented.
- If it is not possible to avoid the scatters of Iron Age pottery shards, a mitigation permit must be applied for from SAHRA.
- A 100m buffer around the historic stone-walled kraal (Site 041) must be implemented.
- If it is not possible to avoid the historical stone-walled kraal, a mitigation permit must be applied for from SAHRA.
- 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 DAU (Nokusho Ngobeni/Natasha Higgitt 021 202 8660) must be alerted as per section 35(3) of the NHRA. Non-compliance with this section of the NHRA is an offence 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 DAU (Nokusho Ngobeni/Natasha Higgitt 021 202 8660), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with this section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) 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;
- As the Final EIA has been finalised without the inclusion of SAHRA comments, this comment must be forwarded directly to the competent authority for their review as part of the decision making process in

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Case ID: 25892

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terms of section 38(8) of the NHRA. Proof of the delivery and receipt thereof must be provided to SAHRA;

- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the case file.
- The Final EIA and EMPr must be submitted to SAHRA for record purposes;

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Nokusho Ngobeni

South African Heritage Resources Agency

Natasha Higgitt
Manager: Development Applications Unit

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South African Heritage Resources Agency

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.

ADMIN:

Direct URL to case: <https://sahris.org.za/node/384138>

Proposed Development of the 240MW Draailoop Solar PV Energy Facility near Banderlierkop in the Limpopo Province



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Case ID: 25893

Date: Thursday, 29 January, 2026

Final Comment

In terms of Section 38(4) of the National Heritage Resources Act (Act 25 of 1999)/In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Andrew Pearson
Draailoop Solar PV (Pty) Ltd
21st Floor, Portside,
5 Buitengracht Street,
Cape Town,
8001

The applicant Draailoop Solar PV (Pty) Ltd are proposing the construction of a Solar Photovoltaic (PV) Energy Facility and associated infrastructure, known as Draailoop Solar PV, on Portion 1 of Farm 425, Remainder of Farm 430 and Farm 431 located South of Louis Trichardt in the Makhado Local Municipality, Vhembe District, Limpopo Province.

This case (Case ID 25893 [Proposed Development of the 240MW Draailoop Solar PV Energy Facility near Banderlierkop in the Limpopo Province | SAHRIS](#)) is linked to Case ID's 25892 ([Proposed Development of the 240MW Bethel Solar PV Facility near Banderlierkop in the Limpopo Province | SAHRIS](#)), 25894 ([Proposed Development of the 240MW Klipput Solar PV Energy Facility near Banderlierkop in the Limpopo Province | SAHRIS](#)) and 25895 ([Proposed Development of the 75MW Makoppa Solar PV Facility near Banderlierkop in the Limpopo Province | SAHRIS](#)).

A Final Environmental Impact Assessment Report (FEIAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. A study site of approximately 857ha is being assessed as part of this Environmental Process and the infrastructure associated with an up to 240 Megawatt (MW) PV facility. The proposed Draailoop Solar PV Project will include the following components: Solar fields; Associated infrastructure; Project IPP Substation; AC coupled BESS installation at project substation and laydown area. This environmental application process includes Electrical Grid Connection Infrastructure required to connect the Draailoop Solar PV to the National Grid via the existing Tabor Main Transmission Substation (MTS).

CTS Heritage has been appointed to provide heritage specialist input as part of the EIA process as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of



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A number of burial grounds and graves were identified (Sites 009, 025-falls within the proposed PV area, 037 and 038). These burials range from historic to recent and are all located outside of municipal cemeteries. Due to their high levels of local social and spiritual significance, burials have high levels of local cultural value and are graded IIIA. It is recommended that a no development buffer of 100m is implemented around such burials in order to retain their sense of place as well as to ensure that no associated unmarked human remains are accidentally impacted by development activities.

A rock shelters with associated buried archaeological deposit and rock art (Site 011 and 044, graded IIIA) as well as scatters of Iron Age pottery shards (Sites 012 and 016, Graded IIIC) were identified. The field assessment also identified one historic stone-walled kraal (Site 041). This site has been graded IIIB.

Historical graveyards related to the families at Draailoop and Klipput were recorded with separate graves and ruined dwellings at Bethel and Klipput for farmworkers and their relatives. It was surprising to see relatively low artefact counts but later checks through the historical satellite imagery showed the large number of previously ploughed fields in the PV areas which are now fallow for the game farming and hunting businesses. This explains the highly disturbed and unnaturally level ground present across much of the PV areas.

The Visual SSVR determines that the Scenic Quality of the development area is rated as Medium to High. The undulating bushveld landscape does have value due to its extensive coverage without development or transformation by agriculture or human settlement. The terrain is primarily gently undulating, with a small ridgeline in the northern areas and a rocky outcrop in the southern portion of the property. The landscape maintains its value largely because it remains undeveloped by agriculture or settlements. Aside from the Eskom OHPL corridor, which shows some signs of landscape degradation, structural developments are characterized as rural, agricultural, or game farm-related, and are non-imposing. The Visual SSVR concludes that the majority of the property is suitable for PV development and with the incorporation of the recommended setbacks and No-Go areas, would not result in degradation of significant landscape / visual resources. As such, the project is not defined as a Fatal Flaw. The visual impacts of the proposed development are more thoroughly assessed in the VIA



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According to the SAHRIS Palaeosensitivity Map the development sites are underlain by sediments of very LOW fossil sensitivity. The proposed development is underlain with Matok Granite (Coarse-grained, porphyritic, pink and grey biotite granite, in places hornblende granite), and Goudplaats-Hout River Gneiss (Leucocratic, strongly migmatised biotite gneiss and greyish, weakly migmatised biotite gneiss; minor leucogneiss and dark grey biotite gneiss). Both these formations have Insignificant or Zero Palaeontological sensitivity. The third formation that is present in the study area is the Bandelierkop Formation Predominantly volcanic igneous rocks, plus some igneous intrusions, minor sediments such as banded iron formation, chert, quartzite, conglomerate, and schists) which has Low Palaeontological Sensitivity.

It is unlikely that the proposed development will have a significant impact on palaeontological resources, and no further assessments are required.

Recommendations

- The mitigation measures outlined in Table 2 above are implemented. This is adhered to in the layout provided
- The granite koppies within the development area are considered to be sensitive and are excluded from the development footprint. This is adhered to in the layout provided
- A Conservation Management Plan is drafted for the ongoing conservation of the significant archaeological sites and burials identified within the area proposed for development
- Although all possible care has been taken to identify sites of cultural importance during the investigation of the study area, it is always possible that hidden or subsurface sites could be overlooked during the assessment. 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, burials or other categories of heritage resources are found during the proposed development, work must cease in the vicinity of the find and SAHRA must be alerted immediately to determine an appropriate way forward.

Comments and Responses report

A community engagement was conducted with Chatleka Community Property Association (CPA) who objected to the HIA report noting that the following:

- Failure to Assess Living Cultural Landscape

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- Omission of Ancestral Graves and Sites
- Procedural Flaws and Exclusion
- HIA Recommendations are Insufficient

Therefore, it was recommended that the CPA engage with an appropriate academic institution urgently to ensure that this oral history is accurately recorded and documented through an academic process. The CPA has identified burials and spaces within the area proposed for development as associated with their living heritage. In lieu of specific location information from the CPA, additional research was undertaken to identify places that have or may have cultural heritage value. An additional site visit was also undertaken to ground-truth the identified sites. The results of this analysis are included in the updated HIA. These additional heritage sites along with the appropriate buffers provided by the heritage specialist were used to inform the layout. Layout Alternative 4 (Mitigated Preferred Layout) avoids all of the identified heritage features.

It is recommended that the property owner and developer sign a Heritage Agreement with a Conservation Management Plan (CMP) for the ongoing conservation of the significant archaeological sites and burials identified within the area proposed for development. The recommendation for a CMP for the identified features must be endorsed by SAHRA before the CMP is drafted and a Heritage Agreement is signed. As such, the process for the heritage agreement and CMP must be initiated only if Environmental Authorisation is granted for the project

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 EIA and EMP:

- 38(4)a – The SAHRA Development Application Unit (DAU) has no objections to the proposed development.
- 38(4)b – The recommendations provided by the heritage specialists are supported and must be adhered to. Further additional conditions include the following:
 - A no development buffer of 100m is implemented around burial grounds and graves (Sites 009, 025, 037 and 038).
 - If it is not possible to avoid the burial sites, a stakeholder engagement process must be undertaken in terms of section 36 of the NHRA and Chapter XI of the NHRA 2000 Regulations, to obtain permission to fence or relocate the graves;



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- Should relocation of the graves be found feasible an archaeologist must be appointed to apply to LIHRA for a section 36 permit application in terms of chapter IX of the NHRA 2000 Regulations for the relocation of graves older than 60 years;
- A Conservation Management Plan will have to be drafted and implemented as part of the development and submitted to SAHRA for approval.
- A 50m buffer around the rock shelters with associated buried archaeological deposit and rock art (Site 011 and 044) must be implemented.
- If it is not possible to avoid the rock shelters a mitigation permit must be applied for from SAHRA.
- A 50m buffer around the scatters of Iron Age pottery shards (Sites 012 and 016) must be implemented.
- If it is not possible to avoid the scatters of Iron Age pottery shards, a mitigation permit must be applied for from SAHRA.
- A 100m buffer around the historic stone-walled kraal (Site 041) must be implemented.
- If it is not possible to avoid the historical stone-walled kraal, a mitigation permit must be applied for from SAHRA.
- 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 DAU (Nokusho Ngobeni/Natasha Higgitt 021 202 8660) must be alerted as per section 35(3) of the NHRA. Non-compliance with this section of the NHRA is an offence 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 DAU (Nokusho Ngobeni/Natasha Higgitt 021 202 8660), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with this section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) 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;
- As the Final EIA has been finalised without the inclusion of SAHRA comments, this comment must be forwarded directly to the competent authority for their review as part of the decision making process in terms of section 38(8) of the NHRA. Proof of the delivery and receipt thereof must be provided to

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SAHRA;

- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the case file.
- The Final EIA and EMPr must be submitted to SAHRA for record purposes;

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Nokusho Ngobeni

South African Heritage Resources Agency

Natasha Higgitt
Manager: Development Applications Unit
South African Heritage Resources Agency

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for

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- 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.

ADMIN:

Direct URL to case: <https://sahris.org.za/node/384139>

Proposed Development of the 240MW Klipput Solar PV Energy Facility near Banderlierkop in the Limpopo Province



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T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
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Final Comment

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Andrew Pearson
Klipput Solar PV (Pty) Ltd
21st Floor, Portside,
5 Buitengracht Street,
Cape Town,
8001

Cape Environmental Assessment Practitioners was appointed by Klipput Solar PV (Pty) Ltd to undertake an Environmental Impact Assessment (EIA) process for the proposed Klipput Solar PV Facility and Associated Infrastructure on Portion 1 of Farm 425, Portion 1 of Farm 466 and the Remainder of Farm 466 located South of Louis Trichardt in the Makhado Local Municipality, Vhembe District, Limpopo Province.

This case (Case ID 25894 [Proposed Development of the 240MW Klipput Solar PV Energy Facility near Banderlierkop in the Limpopo Province | SAHRIS](#)) is linked to Case ID's 25893 ([Proposed Development of the 240MW Draailoop Solar PV Energy Facility near Banderlierkop in the Limpopo Province | SAHRIS](#)), 25892 ([Proposed Development of the 240MW Bethel Solar PV Facility near Banderlierkop in the Limpopo Province | SAHRIS](#)) and 25895 ([Proposed Development of the 75MW Makoppa Solar PV Facility near Banderlierkop in the Limpopo Province | SAHRIS](#)).

A Draft Environmental Impact Assessment Report (DEIAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. A study site of approximately 601ha is being assessed as part of this Environmental Process and the infrastructure associated with an up to 240 Megawatt (MW) PV facility. The proposed Klipput Solar PV Project will include the following components: The proposed Bethel Solar PV Project will include the following components: Solar fields; Associated infrastructure; Project IPP Substation; AC coupled BESS installation at project substation and laydown area. This environmental application process includes Electrical Grid Connection Infrastructure required to connect the Klipput Solar PV to the National Grid via the existing Tabor Main Transmission Substation (MTS).

CTS Heritage has been appointed to provide heritage specialist input as part of the EIA process as required by



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section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Lavin, J., Wiltshire, N & Crafford, M. 2025. HERITAGE IMPACT ASSESSMENT In terms of Section 38(8) of the NHRA for the Proposed Development of the 240MW Klipput Solar PV Energy Facility near Banderlierkop in the Limpopo Province

A number of burial grounds and graves were identified (Sites 009, 025, 037 and 038). These burials range from historic to recent and are all located outside of municipal cemeteries. Due to their high levels of local social and spiritual significance, burials have high levels of local cultural value and are graded IIIA. It is recommended that a no development buffer of 100m is implemented around such burials in order to retain their sense of place as well as to ensure that no associated unmarked human remains are accidentally impacted by development activities.

A rock shelters with associated buried archaeological deposit and rock art (Site 011 and 044, graded IIIA) as well as scatters of Iron Age pottery shards (Sites 012 and 016, Graded IIIC) were identified. The field assessment also identified one historic stone-walled kraal (Site 041). This site has been graded IIIB.

Historical graveyards related to the families at Draailoop and Klipput were recorded with separate graves and ruined dwellings at Bethel and Klipput for farmworkers and their relatives. It was surprising to see relatively low artefact counts but later checks through the historical satellite imagery showed the large number of previously ploughed fields in the PV areas which are now fallow for the game farming and hunting businesses. This explains the highly disturbed and unnaturally level ground present across much of the PV areas.

The Visual SSVR determines that the Scenic Quality of the development area is rated as Medium to High. The undulating bushveld landscape does have value due to its extensive coverage without development or transformation by agriculture or human settlement. The terrain is primarily gently undulating, with a small ridgeline in the northern areas and a rocky outcrop in the southern portion of the property. The landscape maintains its value largely because it remains undeveloped by agriculture or settlements. Aside from the Eskom OHPL corridor, which shows some signs of landscape degradation, structural developments are characterized as rural, agricultural, or game farm-related, and are non-imposing. The Visual SSVR concludes that the majority of the property is suitable for PV development and with the incorporation of the recommended setbacks and No-Go areas, would not result in degradation of significant landscape / visual resources. As such, the project is not defined as a Fatal Flaw. The visual impacts of the proposed development are more



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www.sahra.org.za

thoroughly assessed in the VIA

According to the SAHRIS Palaeosensitivity Map the development sites are underlain by sediments of very LOW fossil sensitivity. The proposed development is underlain with Matok Granite (Coarse-grained, porphyritic, pink and grey biotite granite, in places hornblende granite), and Goudplaats-Hout River Gneiss (Leucocratic, strongly migmatised biotite gneiss and greyish, weakly migmatised biotite gneiss; minor leucogneiss and dark grey biotite gneiss). Both these formations have Insignificant or Zero Palaeontological sensitivity. The third formation that is present in the study area is the Bandelierkop Formation Predominantly volcanic igneous rocks, plus some igneous intrusions, minor sediments such as banded iron formation, chert, quartzite, conglomerate, and schists) which has Low Palaeontological Sensitivity.

It is unlikely that the proposed development will have a significant impact on palaeontological resources, and no further assessments are required.

Recommendations

- The mitigation measures outlined in Table 2 above are implemented. This is adhered to in the layout provided
- The granite koppies within the development area are considered to be sensitive and are excluded from the development footprint. This is adhered to in the layout provided
- A Conservation Management Plan is drafted for the ongoing conservation of the significant archaeological sites and burials identified within the area proposed for development
- Although all possible care has been taken to identify sites of cultural importance during the investigation of the study area, it is always possible that hidden or subsurface sites could be overlooked during the assessment. 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, burials or other categories of heritage resources are found during the proposed development, work must cease in the vicinity of the find and SAHRA must be alerted immediately to determine an appropriate way forward.

Comments and Responses report

A community engagement was conducted with Chatleka Community Property Association (CPA) who objected to the HIA report noting that the following:

Proposed Development of the 240MW Klipput Solar PV Energy Facility near Banderlierkop in the Limpopo Province



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www.sahra.org.za

Enquiries: Nokusho Ngobeni
Tel:
Email: nngobeni@sahra.org.za
Case ID: 25894

Date: Thursday, 29 January, 2026

- Failure to Assess Living Cultural Landscape
- Omission of Ancestral Graves and Sites
- Procedural Flaws and Exclusion
- HIA Recommendations are Insufficient

Therefore, it was recommended that the CPA engage with an appropriate academic institution urgently to ensure that this oral history is accurately recorded and documented through an academic process. The CPA has identified burials and spaces within the area proposed for development as associated with their living heritage. In lieu of specific location information from the CPA, additional research was undertaken to identify places that have or may have cultural heritage value. An additional site visit was also undertaken to ground-truth the identified sites. The results of this analysis are included in the updated HIA. These additional heritage sites along with the appropriate buffers provided by the heritage specialist were used to inform the layout. Layout Alternative 4 (Mitigated Preferred Layout) avoids all of the identified heritage features.

It is recommended that the property owner and developer sign a Heritage Agreement with a Conservation Management Plan (CMP) for the ongoing conservation of the significant archaeological sites and burials identified within the area proposed for development. The recommendation for a CMP for the identified features must be endorsed by SAHRA before the CMP is drafted and a Heritage Agreement is signed. As such, the process for the heritage agreement and CMP must be initiated only if Environmental Authorisation is granted for the project.

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 EIA and EMP:

- 38(4)a – The SAHRA Development Application Unit (DAU) has no objections to the proposed development.
- 38(4)b – The recommendations provided by the heritage specialists are supported and must be adhered to. Further additional conditions include the following:
 - A no development buffer of 100m is implemented around burial grounds and graves (Sites 009, 025, 037 and 038).
 - If it is not possible to avoid the burial sites, a stakeholder engagement process must be undertaken in terms of section 36 of the NHRA and Chapter XI of the NHRA 2000 Regulations, to obtain permission



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T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
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to fence or relocate the graves;

- Should relocation of the graves be found feasible an archaeologist must be appointed to apply to LIHRA for a section 36 permit application in terms of chapter IX of the NHRA 2000 Regulations for the relocation of graves older than 60 years;
- A Conservation Management Plan will have to be drafted and implemented as part of the development and submitted to SAHRA for approval.
- A 50m buffer around the rock shelters with associated buried archaeological deposit and rock art (Site 011 and 044) must be implemented.
- If it is not possible to avoid the rock shelters a mitigation permit must be applied for from SAHRA.
- A 50m buffer around the scatters of Iron Age pottery shards (Sites 012 and 016) must be implemented.
- If it is not possible to avoid the scatters of Iron Age pottery shards, a mitigation permit must be applied for from SAHRA.
- A 100m buffer around the historic stone-walled kraal (Site 041) must be implemented.
- If it is not possible to avoid the historical stone-walled kraal, a mitigation permit must be applied for from SAHRA.
- 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 DAU (Nokusho Ngobeni/Natasha Higgitt 021 202 8660) must be alerted as per section 35(3) of the NHRA. Non-compliance with this section of the NHRA is an offence 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 DAU (Nokusho Ngobeni/Natasha Higgitt 021 202 8660), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with this section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) 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;
- As the Final EIA has been finalised without the inclusion of SAHRA comments, this comment must be forwarded directly to the competent authority for their review as part of the decision making process in

Proposed Development of the 240MW Klipput Solar PV Energy Facility near Banderlierkop in the Limpopo Province



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P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Nokusho Ngobeni
Tel:
Email: nngobeni@sahra.org.za
Case ID: 25894

Date: Thursday, 29 January, 2026

terms of section 38(8) of the NHRA. Proof of the delivery and receipt thereof must be provided to SAHRA;

- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the case file.
- The Final EIA and EMPr must be submitted to SAHRA for record purposes;

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Nokusho Ngobeni

South African Heritage Resources Agency

Natasha Higgitt
Manager: Development Applications Unit
South African Heritage Resources Agency

Terms & Conditions:

Proposed Development of the 240MW Klipput Solar PV Energy Facility near Banderlierkop in the Limpopo Province



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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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Enquiries: Nokusho Ngobeni
Tel:
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Case ID: 25894

Date: Thursday, 29 January, 2026

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.

ADMIN:

Direct URL to case: <https://sahris.org.za/node/384140>

Proposed Development of the 75MW Makoppa Solar PV Facility near Banderlierkop in the Limpopo Province



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Nokusho Ngobeni
Tel:
Email: nngobeni@sahra.org.za
Case ID: 25895

Date: Thursday, 29 January, 2026

Final Comment

In terms of Section 38(4) of the National Heritage Resources Act (Act 25 of 1999)/In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Andrew Pearson
Makoppa Solar PV (Pty) Ltd
21st Floor, Portside,
5 Buitengracht Street,
Cape Town,
8001

Cape Environmental Assessment Practitioners was appointed by Makoppa Solar PV (Pty) Ltd to undertake an Environmental Impact Assessment (EIA) process for the proposed Makoppa Solar PV Facility and Associated Infrastructure on Portion 1 of Farm 465 located South of Louis Trichardt in the Makhado Local Municipality, Vhembe District, Limpopo Province.

A Final Environmental Impact Assessment Report (FEIAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. A study site of approximately 341ha is being assessed as part of this Environmental Process and the infrastructure associated with an up to 75 Megawatt (MW) PV facility. The proposed Makoppa Solar PV Project will include the following components: The proposed Bethel Solar PV Project will include the following components: Solar fields; Associated infrastructure; Project IPP Substation; AC coupled BESS installation at project substation and laydown area. This environmental application process includes Electrical Grid Connection Infrastructure required to connect the Makoppa Solar PV to the National Grid via the existing Tabor Main Transmission Substation (MTS).

CTS Heritage has been appointed to provide heritage specialist input as part of the EIA process as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Lavin, J., Wiltshire, N & Crafford, M. 2025. HERITAGE IMPACT ASSESSMENT In terms of Section 38(8) of the NHRA for the Proposed Development of the 75MW Makoppa Solar PV Facility near Banderlierkop in the Limpopo Province



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Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

A number of burial grounds and graves were identified (Sites 009, 025, 037 and 038). These burials range from historic to recent and are all located outside of municipal cemeteries. Due to their high levels of local social and spiritual significance, burials have high levels of local cultural value and are graded IIIA. It is recommended that a no development buffer of 100m is implemented around such burials in order to retain their sense of place as well as to ensure that no associated unmarked human remains are accidentally impacted by development activities.

Sites 011 and 012 fall within the proposed PV area. These archaeological observations include rock shelters with associated buried archaeological deposit and rock art (Site 011, graded IIIA) as well as scatters of Iron Age pottery shards (Sites 012, Graded IIIC). These significant archaeological observations are indicative of the potential for additional associated buried archaeology located in close proximity to these sites. Due to their scientific value, these sites may not be negatively impacted by the proposed development and appropriate no development buffers for these sites are recommended in the table above.

Historical graveyards related to the families at Draailoop and Klipput were recorded with separate graves and ruined dwellings at Bethel and Klipput for farmworkers and their relatives. It was surprising to see relatively low artefact counts but later checks through the historical satellite imagery showed the large number of previously ploughed fields in the PV areas which are now fallow for the game farming and hunting businesses. This explains the highly disturbed and unnaturally level ground present across much of the PV areas.

The Visual SSVR determines that the Scenic Quality of the development area is rated as Medium to High. The undulating bushveld landscape does have value due to its extensive coverage without development or transformation by agriculture or human settlement. The terrain is primarily gently undulating, with a small ridgeline in the northern areas and a rocky outcrop in the southern portion of the property. The landscape maintains its value largely because it remains undeveloped by agriculture or settlements. Aside from the Eskom OHPL corridor, which shows some signs of landscape degradation, structural developments are characterized as rural, agricultural, or game farm-related, and are non-imposing. The Visual SSVR concludes that the majority of the property is suitable for PV development and with the incorporation of the recommended setbacks and No-Go areas, would not result in degradation of significant landscape / visual resources. As such, the project is not defined as a Fatal Flaw. The visual impacts of the proposed development are more thoroughly assessed in the VIA

According to the SAHRIS Palaeosensitivity Map the development sites are underlain by sediments of very LOW fossil sensitivity. The proposed development is underlain with Matok Granite (Coarse-grained,



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T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
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porphyritic, pink and grey biotite granite, in places hornblende granite), and Goudplaats-Hout River Gneiss (Leucocratic, strongly migmatized biotite gneiss and greyish, weakly migmatized biotite gneiss; minor leucogneiss and dark grey biotite gneiss). Both these formations have Insignificant or Zero Palaeontological sensitivity. The third formation that is present in the study area is the Bandelierkop Formation Predominantly volcanic igneous rocks, plus some igneous intrusions, minor sediments such as banded iron formation, chert, quartzite, conglomerate, and schists) which has Low Palaeontological Sensitivity.

It is unlikely that the proposed development will have a significant impact on palaeontological resources and no further assessments are required.

Recommendations

- The mitigation measures outlined in Table 2 above are implemented. This is adhered to in the layout provided
- The granite koppies within the development area are considered to be sensitive and are excluded from the development footprint. This is adhered to in the layout provided.
- A Conservation Management Plan is drafted for the ongoing conservation of the significant archaeological sites and burials identified within the area proposed for development.
- Although all possible care has been taken to identify sites of cultural importance during the investigation of the study area, it is always possible that hidden or subsurface sites could be overlooked during the assessment. 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, burials or other categories of heritage resources are found during the proposed development, work must cease in the vicinity of the find and SAHRA must be alerted immediately to determine an appropriate way forward.

Comments and Responses report

A community engagement was conducted with Chatleka Community Property Association (CPA) who objected to the HIA report noting that the following:

- Failure to Assess Living Cultural Landscape
- Omission of Ancestral Graves and Sites
- Procedural Flaws and Exclusion

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T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
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www.sahra.org.za

Enquiries: Nokusho Ngobeni
Tel:
Email: nngobeni@sahra.org.za
Case ID: 25895

Date: Thursday, 29 January, 2026

- HIA Recommendations are Insufficient

Therefore, it was recommended that the CPA engage with an appropriate academic institution urgently to ensure that this oral history is accurately recorded and documented through an academic process. The CPA has identified burials and spaces within the area proposed for development as associated with their living heritage. In lieu of specific location information from the CPA, additional research was undertaken to identify places that have or may have cultural heritage value. An additional site visit was also undertaken to ground-truth the identified sites. The results of this analysis are included in the updated HIA. These additional heritage sites along with the appropriate buffers provided by the heritage specialist were used to inform the layout. Layout Alternative 4 (Mitigated Preferred Layout) avoids all of the identified heritage features.

It is recommended that the property owner and developer sign a Heritage Agreement with a Conservation Management Plan (CMP) for the ongoing conservation of the significant archaeological sites and burials identified within the area proposed for development. The recommendation for a CMP for the identified features must be endorsed by SAHRA before the CMP is drafted and a Heritage Agreement is signed. As such, the process for the heritage agreement and CMP must be initiated only if Environmental Authorisation is granted for the project.

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 EIA and EMP:

- 38(4)a – The SAHRA Development Application Unit (DAU) has no objections to the proposed development.
- 38(4)b – The recommendations provided by the heritage specialists are supported and must be adhered to. Further additional conditions include the following:
- A no development buffer of 100m is implemented around burial grounds and graves (Sites 009, 025, 037 and 038).
- If it is not possible to avoid the burial sites, a stakeholder engagement process must be undertaken in terms of section 36 of the NHRA and Chapter XI of the NHRA 2000 Regulations, to obtain permission to fence or relocate the graves;



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T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
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- Should relocation of the graves be found feasible an archaeologist must be appointed to apply to LIHRA for a section 36 permit application in terms of chapter IX of the NHRA 2000 Regulations for the relocation of graves older than 60 years;
- A Conservation Management Plan will have to be drafted and implemented as part of the development and submitted to SAHRA for approval.
- A 50m buffer around the rock shelters with associated buried archaeological deposit and rock art (Site 011 and 044) must be implemented.
- If it is not possible to avoid the rock shelters a mitigation permit must be applied for from SAHRA.
- A 50m buffer around the scatters of Iron Age pottery shards (Sites 012 and 016) must be implemented.
- If it is not possible to avoid the scatters of Iron Age pottery shards, a mitigation permit must be applied for from SAHRA.
- A 100m buffer around the historic stone-walled kraal (Site 041) must be implemented.
- If it is not possible to avoid the historical stone-walled kraal, a mitigation permit must be applied for from SAHRA.
- 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 DAU (Nokusho Ngobeni/Natasha Higgitt 021 202 8660) must be alerted as per section 35(3) of the NHRA. Non-compliance with this section of the NHRA is an offence 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 DAU (Nokusho Ngobeni/Natasha Higgitt 021 202 8660), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with this section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) 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;
- As the Final EIA has been finalised without the inclusion of SAHRA comments, this comment must be forwarded directly to the competent authority for their review as part of the decision making process in terms of section 38(8) of the NHRA. Proof of the delivery and receipt thereof must be provided to

Proposed Development of the 75MW Makoppa Solar PV Facility near Banderlierkop in the Limpopo Province



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T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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www.sahra.org.za

Enquiries: Nokusho Ngobeni
Tel:
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Case ID: 25895

Date: Thursday, 29 January, 2026

SAHRA;

- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the case file.
- The Final EIA and EMPr must be submitted to SAHRA for record purposes;

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Nokusho Ngobeni

South African Heritage Resources Agency

Natasha Higgitt
Manager: Development Applications Unit
South African Heritage Resources Agency

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for

Proposed Development of the 75MW Makoppa Solar PV Facility near Banderlierkop in the Limpopo Province



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T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Nokusho Ngobeni
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- 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.

ADMIN:

Direct URL to case: <https://sahris.org.za/node/384141>