



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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Enquiries: Nokusho Ngobeni
Tel:
Email: nngobeni@sahra.org.za
Case ID: 24516

Date: Monday, 30 June, 2025

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)

Belle Solar 1 (Pty) Ltd
5TH FLOOR
1 OSBORNE ROAD CLAREMONT
Cape Town
7708

Blue Crane Environmental (Pty) Ltd has been appointed as the independent environmental consultant to undertake the required Environmental Impact Assessment Process (EIA). The Applicant, Belle Solar 1 (Pty) Ltd, is proposing the construction of a Photovoltaic (PV) Solar Energy Facility (SEF) (known as Belle Solar 1) located on Portion 2 of the Farm Klipput No. 425, Portion 1 of Farm Makoppa No. 466, Remaining Extent of the Farm Bellevue No. 424 and Portion 1 of the Farm Bellevue No. 424 Registration Division LS, approximately 67 km north from Central Polokwane in the Limpopo Province (DFFE Ref: 14/12/16/3/3/2/2677).

This project (Case ID 24516) is linked to Case ID 24517 ([The Proposed Belle Solar 2 Photovoltaic Energy Facility and Associated Infrastructure near Polokwane, Limpopo Province | SAHRIS](#)) and are both envisaged to operate simultaneously.

A Draft Environmental Impact Assessment (DEIA) Report was submitted in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA) and the NEMA EIA Regulations (As amended). The total area assessed comprises of up to 180 ha proposed for the SEF and supporting infrastructure. An up to 240 m wide and up to 243 m long grid connection corridor has been identified for assessment for the placement of the grid infrastructure required to connect the proposed on-site substation and switching station through a 132 kV LILO connection into the existing Dendron-Tabor 1 132 kV or Dendron-Tabor 2 132 kV overhead power line.

UBIQUE Heritage Consultants has been appointed to provide heritage specialist input as part of the EA process in terms of section 24(4)b(iii) of the NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Fivaz, H., Fairhurst-Booyse, S & Engelbrecht, J. 2025. PHASE 1 HERITAGE IMPACT ASSESSMENT FOR



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THE BELLE SOLAR 1 PHOTOVOLTAIC ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE ON PORTION 2 OF KLIPPUT NO. 425 LS, PORTION 1 OF FARM MAKOPPA NO. 466 LS, PORTION 1 AND THE REMAINING EXTENT OF THE FARM BELLEVUE NO. 424 LS, NEAR POLOKWANE, MAKHADO LOCAL MUNICIPALITY, VHEMBE DISTRICT MUNICIPALITY, LIMPOPO PROVINCE

The author undertook a field assessment and only one gravesite, with two graves, was recorded outside the footprint, near the access road. No other archaeological, historical or culturally significant resources were identified on the footprint. Therefore, there is no expected direct impact on the development during the planning, construction, operational and decommissioning phases.

The proposed Belle Solar 1 and Associated Infrastructure is underlain by rocks of the Archaean Granite-Gneiss Basement represented by the Bandelierkop Complex of the Limpopo Belt as well as the Goudplaats Gneiss. a Low Palaeontological Significance has been allocated for impacts associated with the construction phase of the Belle Solar 1 development pre- and post-mitigation.

Recommendations

All graves are considered highly significant and should thus be protected. Due to the close proximity of the graves to the access road, a safety/cautionary/buffer zone of 20 m is recommended.

Should it be impossible to avoid graveyard(s), grave(s) or burial(s) sites during development, mitigation in the form of grave relocation could be undertaken. This is, however, a lengthy and costly process. Grave relocation specialists should be employed to manage the liaison process with the communities and individuals who, by tradition or familial association, might have an interest in these graves or burial grounds, as well as manage the permit acquisition from the SAHRA Burial Grounds and Graves (BGG) Unit and the arrangements for the exhumation and re-interment of the contents of the graves, at the cost of the applicant and in accordance with any regulations made by the responsible heritage resources authority.

If during construction, 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 must be alerted as per section 35(3) of the NHRA. If unmarked human burials are uncovered, the SAHRA must be alerted immediately as per section 36(6) of the NHRA. Depending on the nature of the finds, a professional archaeologist or palaeontologist must be contacted as soon as possible to inspect the findings.



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If the newly discovered heritage resources are of archaeological or palaeontological significance, a Phase 2 rescue operation may be required, subject to permits issued by SAHRA.

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 20m buffer around the graves must be established.
 - 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 install the fence or relocate the grave;
 - Should it not be possible to avoid the grave, a full public consultation process in terms of section 36 of the NHRA and Chapter XI of the NHRA Regulations must be undertaken;
 - If relocation of the grave is found to be feasible following the consultation process, a permit in terms of section 36 of the NHRA and Chapter II and IX 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:

The Proposed Belle Solar 1 Photovoltaic Energy Facility and Associated Infrastructure near Polokwane, Limpopo Province



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- 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;
- 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

The Proposed Belle Solar 1 Photovoltaic Energy Facility and Associated Infrastructure near Polokwane, Limpopo Province



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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 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/360794>