

The Proposed Belle Solar 2 Photovoltaic Energy Facility and Associated Infrastructure near Polokwane, Limpopo Province



an agency of the
Department of Arts and Culture

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Enquiries: Nokusho Ngobeni
Tel:
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Case ID: 24517

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

Belle Solar 2 (Pty) Ltd has appointed Blue Crane Environmental (Pty) Ltd (Blue Crane Environmental) as the independent Environmental Assessment consultant to undertake the Environmental Impact Assessment (EIA) process. The Applicant, Belle Solar 2 (Pty) Ltd, is proposing the construction of a Photovoltaic (PV) Solar Energy Facility (SEF) (known as Belle Solar 2) located on Portion 2 of the Farm Klipput No. 425 and the Remaining Extent of the Farm Bellevue No. 424, Registration Division LS, approximately 67 km north from Central Polokwane within the Makhado Local Municipality within the Vhembe District Municipality, Limpopo Province (DFFE Ref: 14/12/16/3/3/2/2678).

This project (Case ID 24517) is linked to Case ID 24516 ([The Proposed Belle Solar 1 Photovoltaic Energy Facility and Associated Infrastructure near Polokwane, Limpopo Province | SAHRIS](#)) and are both envisaged to operate simultaneously.

A Draft Environment Impact Assessment Report (DEIAR) was submitted in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA) and the Environmental Impact Assessment Regulations, 2014 as amended (EIA). The total area assessed comprises of up to 382 ha proposed for the SEF and supporting infrastructure. An up to 240 m wide and up to 135 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).



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Fairhurst-Booyse, S and Fivaz, H. 2025. PHASE 1 HERITAGE IMPACT ASSESSMENT FOR THE BELLE SOLAR 2 PHOTOVOLTAIC ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE ON THE REMAINING EXTENT AND PORTION 1 OF THE FARM BELLEVUE NO. 424; PORTION 2 OF THE FARM KLIPPUT NO. 425; PORTION 2 OF FARM HAAKDOORN NO. 470, REGISTRATION DIVISION LS, NEAR POLOKWANE, MAKHADO LOCAL MUNICIPALITY, VHEMBE DISTRICT MUNICIPALITY, LIMPOPO PROVINCE

- A Historical Period (late 19th to early 20th century) site (BV424LS/RE/002) with various stone structural features (two stone foundations, a circular structure and a stone wall) along with a medium-density surface cultural material (stone flake, low-fired ceramic, refined earthenware, stoneware, glass and metal). This site is given a 'General' Protection B (Field Rating IVB) and is considered to be of medium significance.
- Building rubble and a demolished brick structure were recorded (BV424LS/RE/005), along with ceramic fragments at BV424LS/RE/006. Due to the poor condition of the site, these resources are given a 'General' Protection C (Field Rating IVC) and are considered low significance. Impact is considered to be negligible.
- A family graveyard with eight graves (BV424LS/RE/004) was recorded within the proposed footprint. All graves are of High importance and should be protected. This site is given a 'Local' Grade Protection B (Field Rating III B). Any impact on the graveyard would be negative.
- One gravesite, with two graves, was recorded outside the footprint, near the proposed footprint.

The proposed Belle Solar 2 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. In terms of palaeontological impacts, a Low Palaeontological Significance has been allocated for impacts associated with the construction phase of the Belle Solar 2 development pre- and post-mitigation

Recommendations

- The historical period site and resources (BV424LS/RE/002 and 003) are given a 'General' Protection B (Field Rating IVB) and is considered to be of medium significance. The impact would be negative. Therefore, it is recommended that a 50m safety/no-go buffer zone be implemented around the site.
- The recorded demolished structural remains (BV424LS/RE/005) and ceramic fragments (BV424LS/RE/006) are considered of low significance. These resources are given a 'General' Protection C (Field Rating IVC) and are considered to be of low significance. Impact is considered to



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be negligible. No further mitigation is recommended.

- The graveyard (BV424LS/RE/004) with eight family graves lies within the proposed footprint. All graves are considered highly significant and should thus be protected. Therefore, a No-Go safety/buffer zone of 50 m is recommended.
- One gravesite with two graves was located outside the footprint, near the footprint. All graves are considered highly significant and should thus be protected. Due to the close proximity of the graves to the footprint, a safety/cautionary/buffer zone of 20 m is recommended. This recommendation is precautionary as no impact is expected.
- 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.

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 EIAR 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/ burial sites 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;

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- A 50m no-go buffer zone must be implemented around the historical period site and resources (BV424LS/RE/002 and 003).
- If it is not possible to avoid the historical period site and the resources, a permit in terms of section 35 of the NHRA and Chapter II and IV of the NHRA Regulations must be applied for from SAHRA in order to mitigate the sites. No damage may occur to these sites without permits 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;
- 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

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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 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/360795>