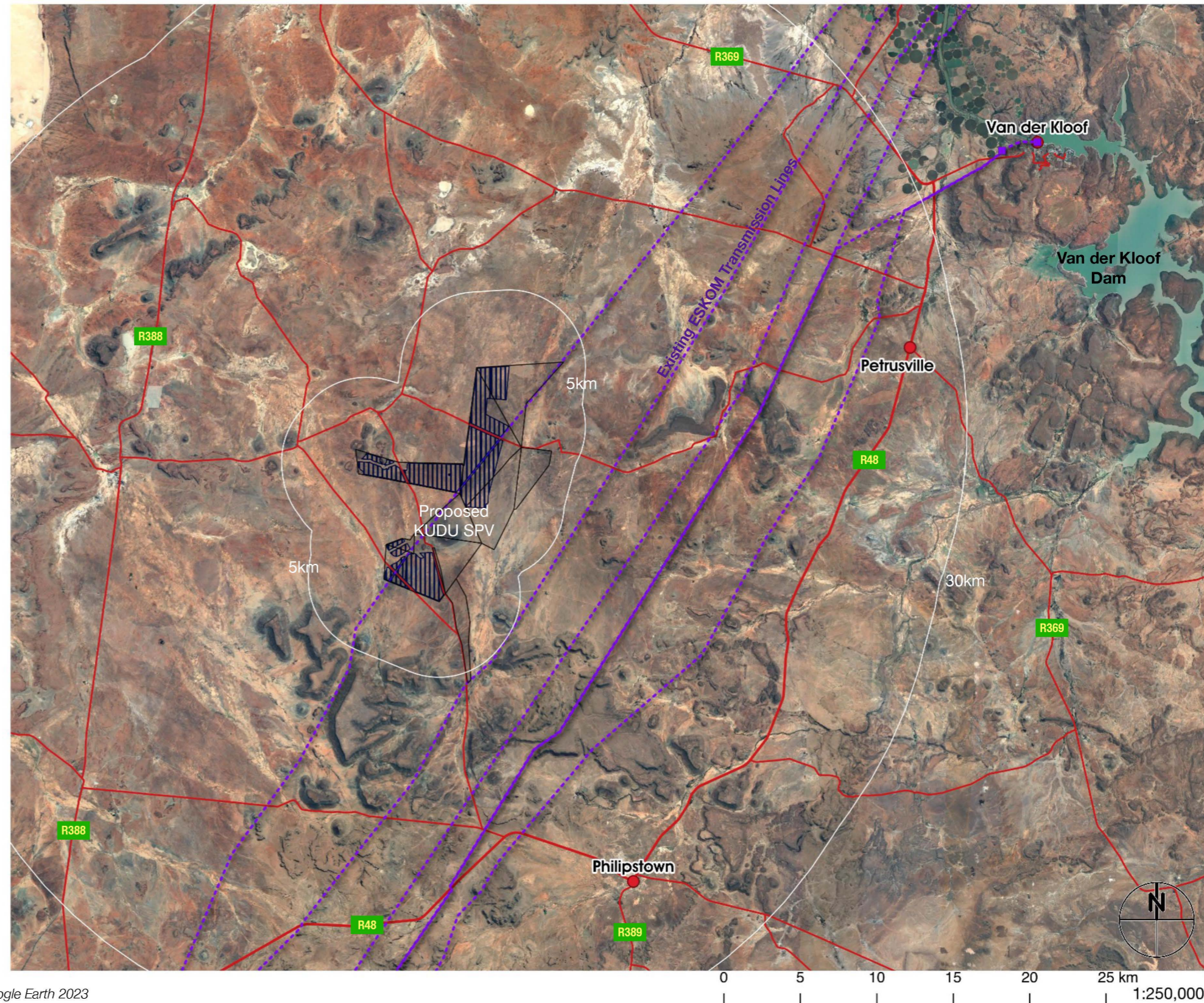






LEGEND :

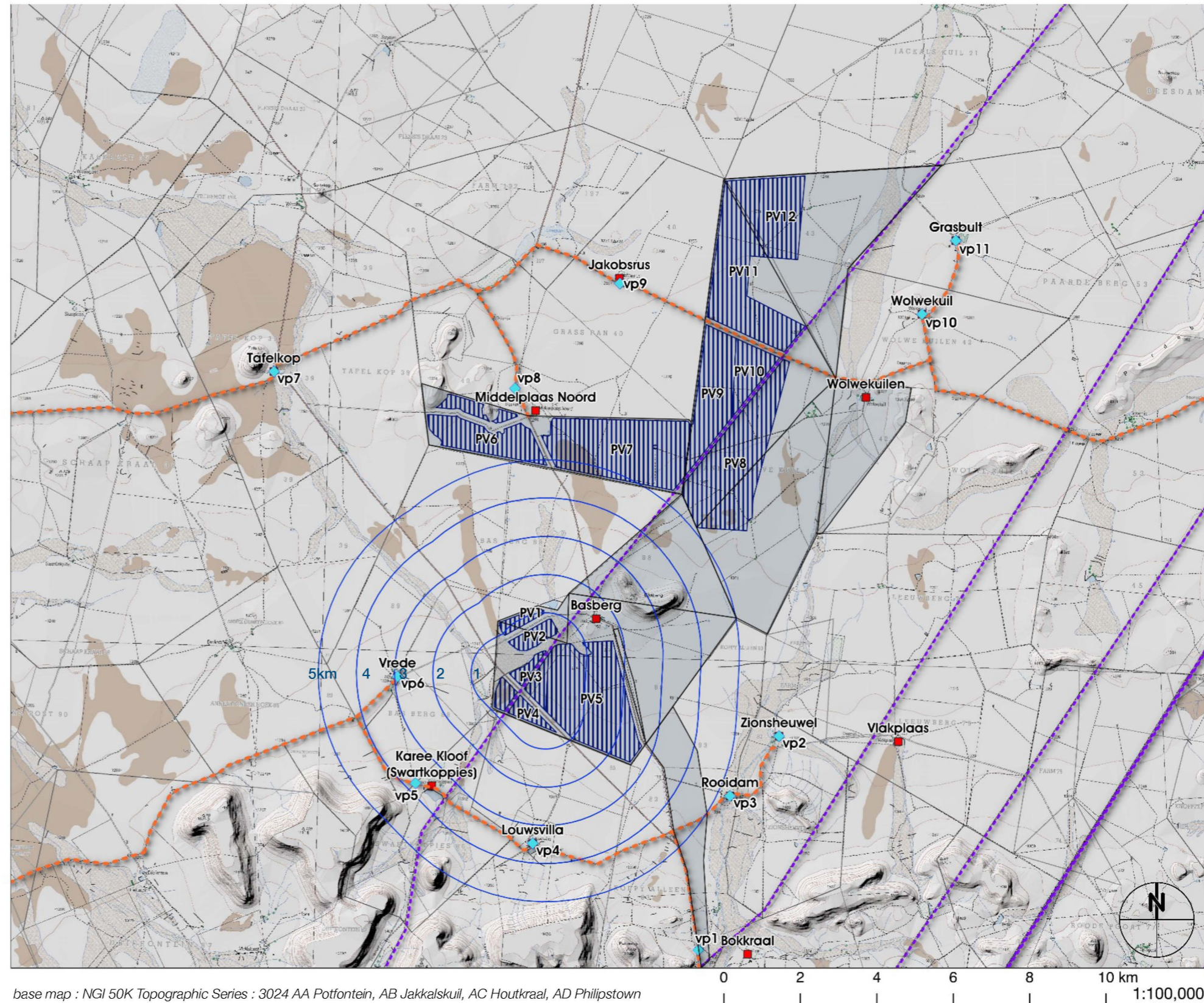
-  KUDU SPV Farm Properties
-  KUDU SPV Areas
-  Existing Eskom Transmission Lines



map 2 : KUDU SPV 3 Local Context

LEGEND :











-  KUDU SPV Farm Properties
-  KUDU SPV Areas
-  Fieldwork Viewpoints
-  Field Track Route

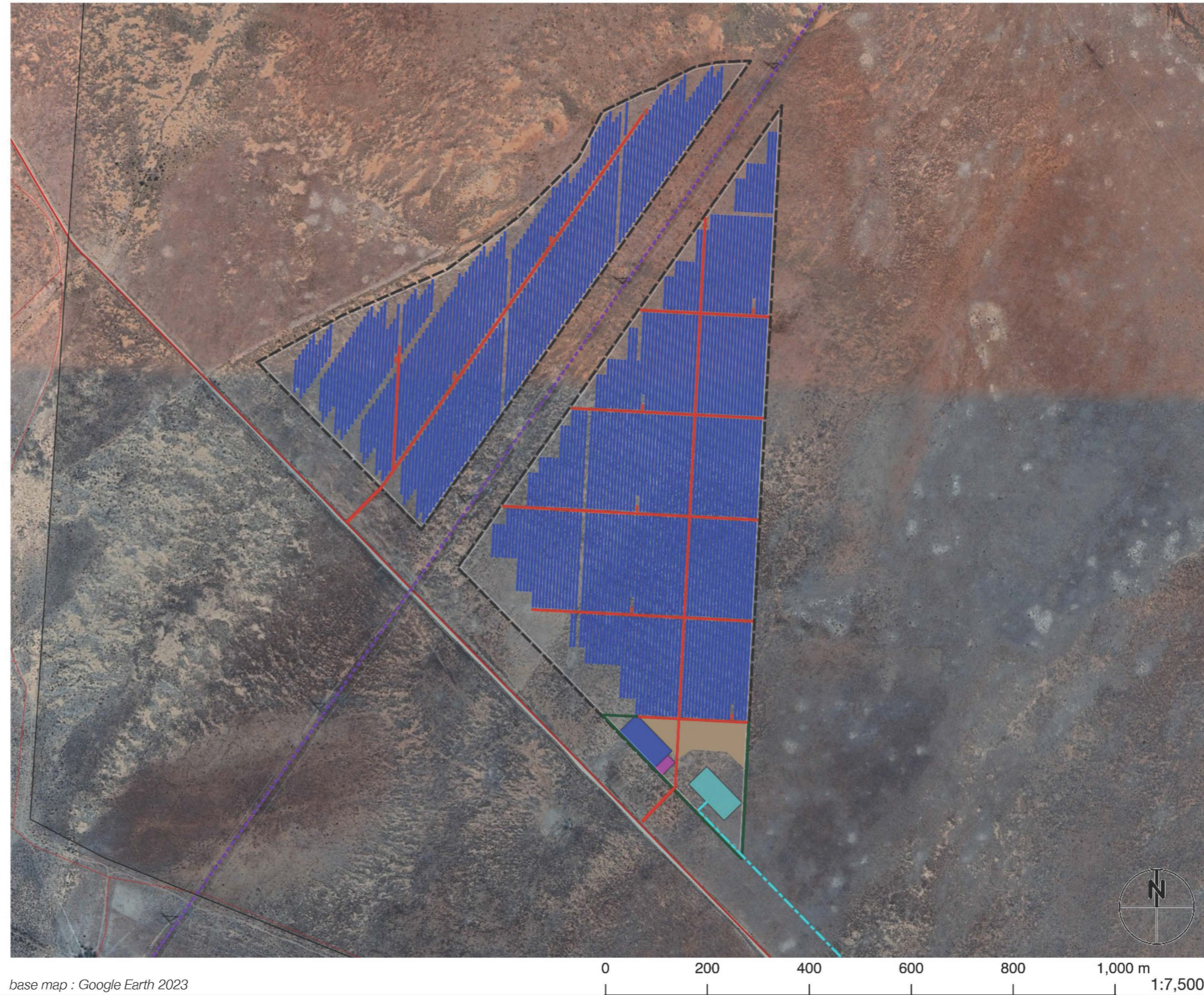


base map : NGI 50K Topographic Series : 3024 AA Potfontein, AB Jakkalskuil, AC Houtkraal, AD Philipstown

map 3 : KUDU SPV 3 • Fieldwork and Viewpoints

FACILITIES LEGEND :

-  Fence Line
-  Substation Complex
-  Laydown Areas
-  O&M Buildings
-  Substation
-  BESS
-  SPV Module Arrays
-  Inverters
-  Access and Internal Roads
-  Overhead Powerline

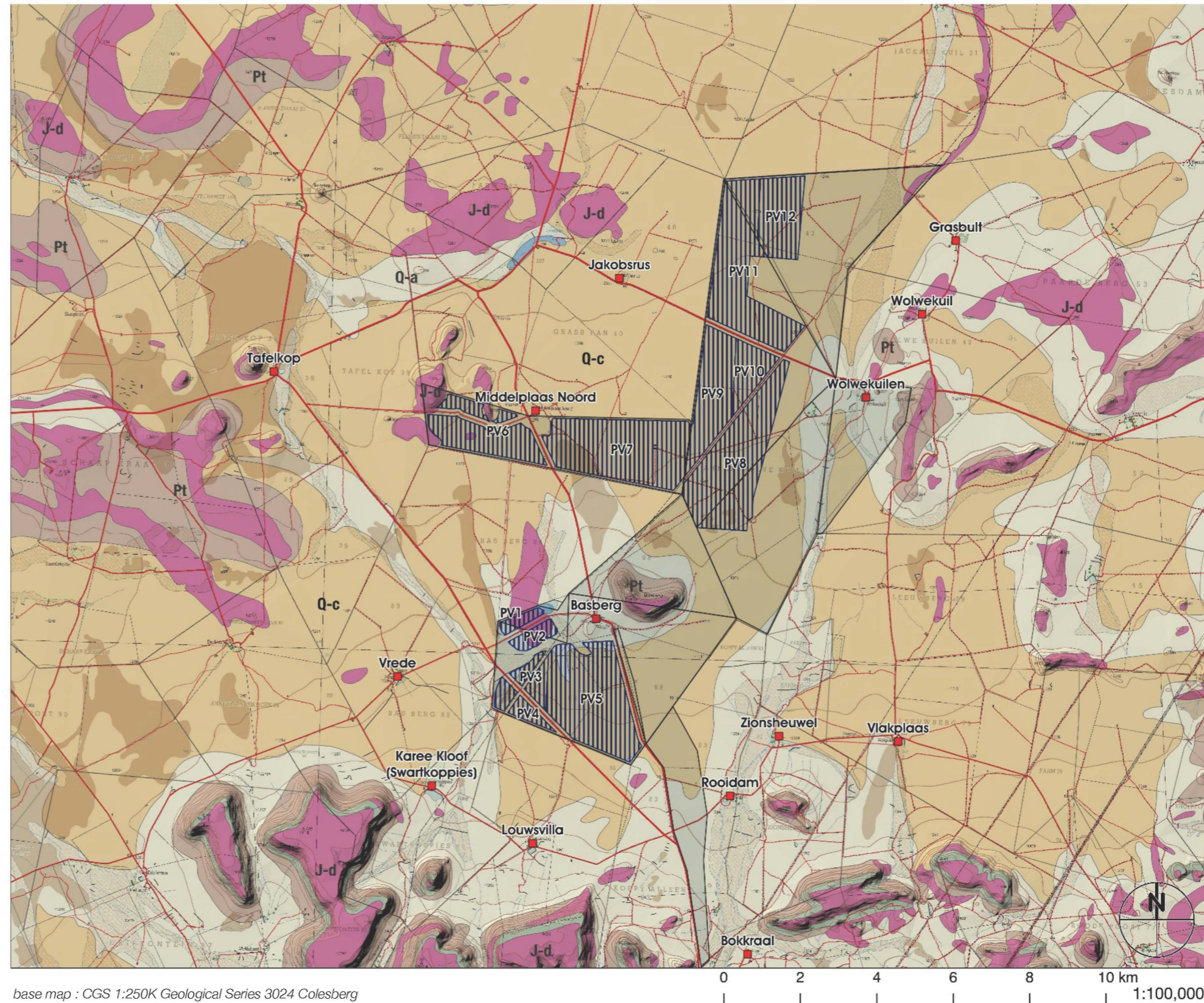


base map : Google Earth 2023

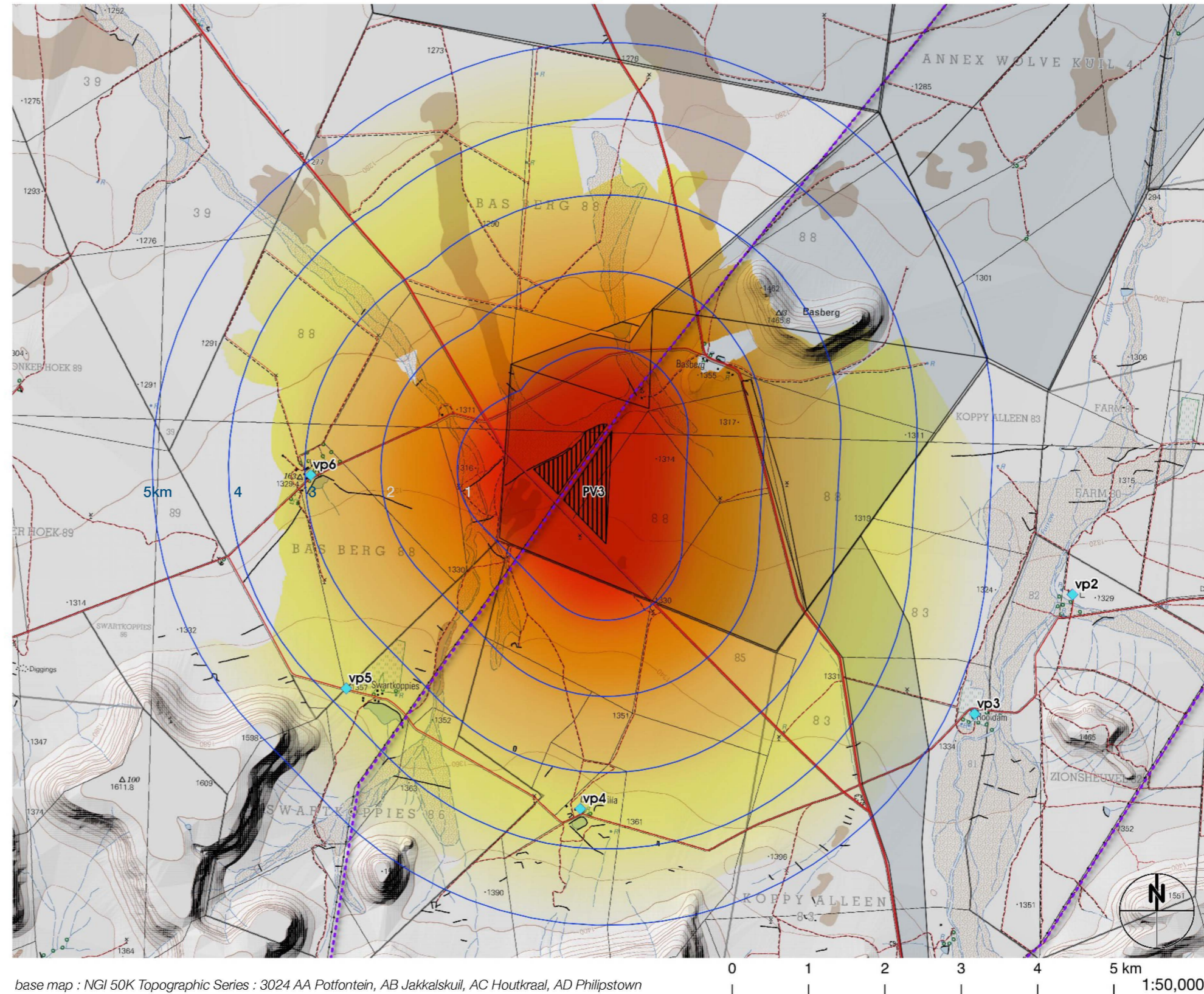
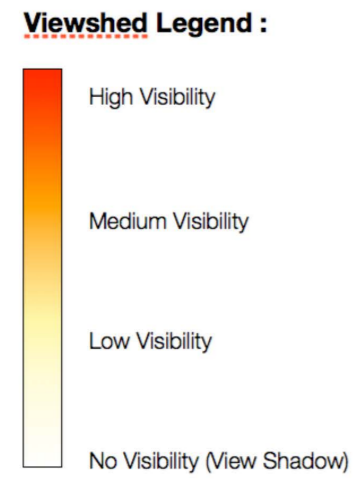
map 4 : KUDU SPV 3 • Facilities Layout

GEOLOGY LEGEND :

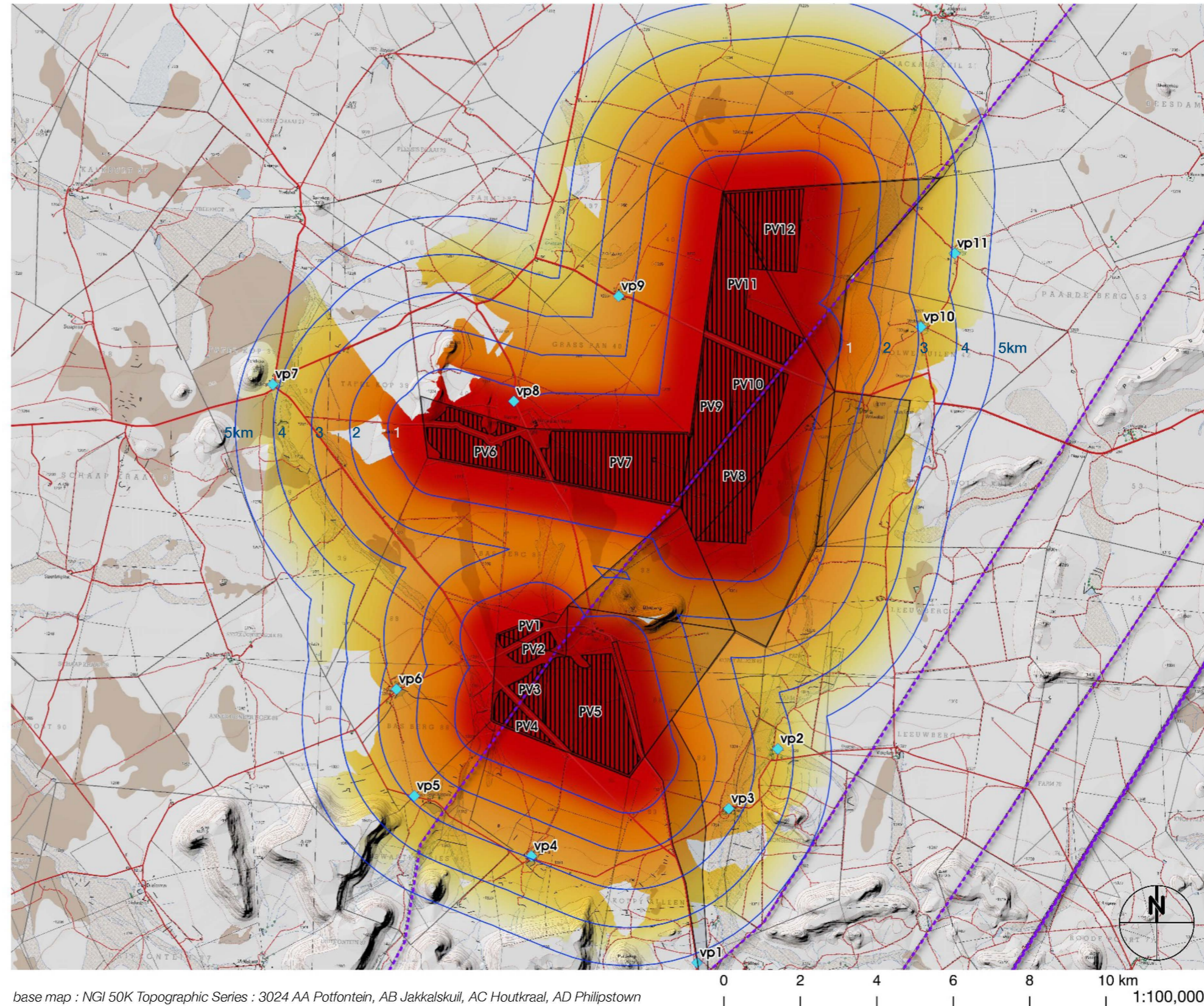
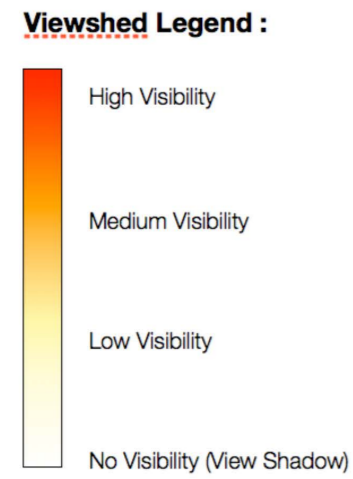
- Q-a** Alluvium
- Q-c** Calcrete
- J-d** Dolerite
- Pa** Beaufort Group Mudstones and Sandstones
- Pt** Ecca Group Shale, Siltstone and Sandstones



map 5 : KUDU SPV 3 Geology



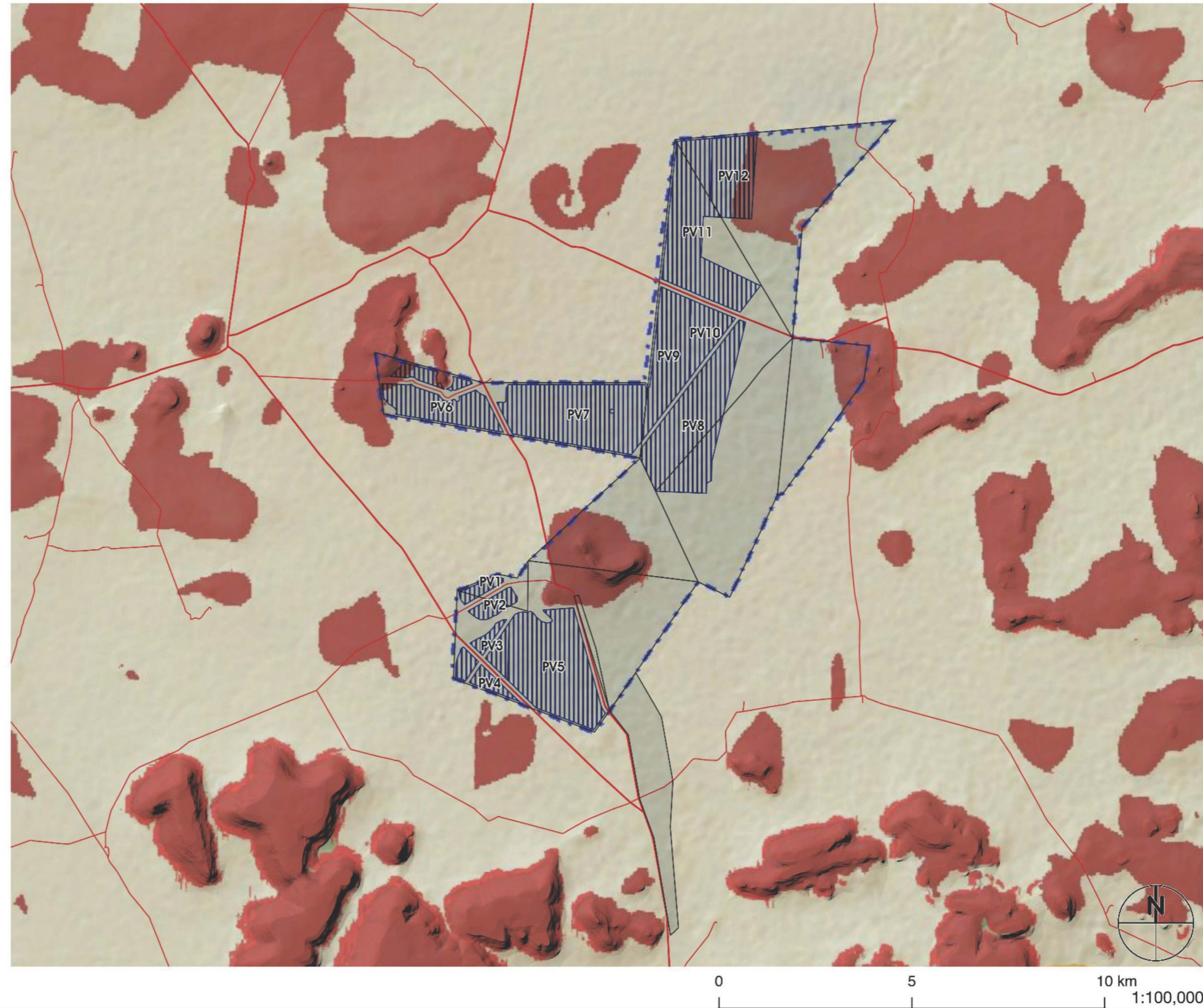
map 6 : KUDU SPV 3 • Nominal Viewshed : PV Arrays 3.5m High



map 7 : KUDU SPV • Combined Viewshed : PV Arrays 3.5m High






Sensitivity Features:

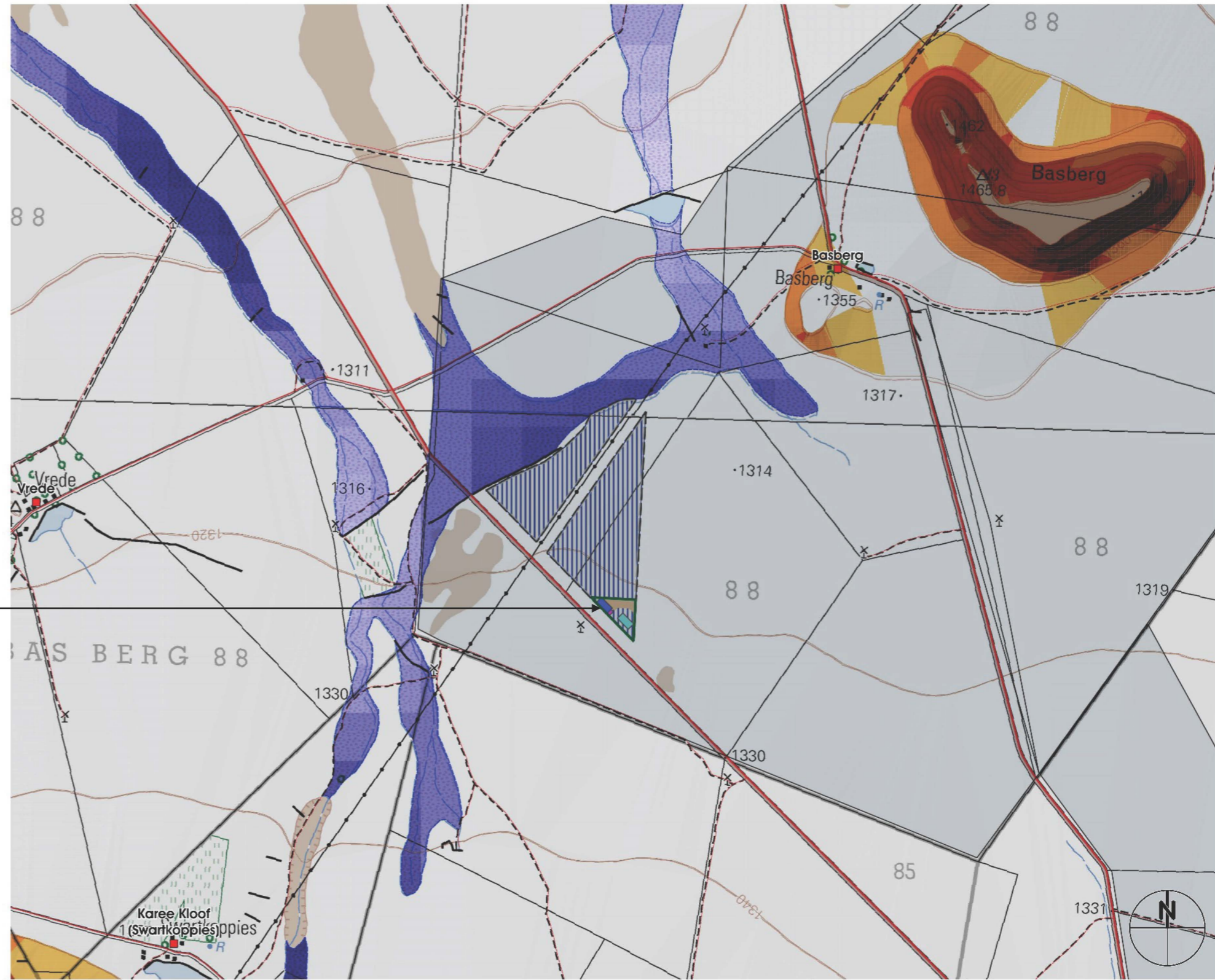
Sensitivity	Feature(s)
High	Slope between 1:4 and 1:10
Low	Slope less than 1:10
Very High	Mountain tops and high ridges
Very High	Slope more than 1:4



map 8 : KUDU SPV 3 : DFFE Screening Tool : Landscape (Solar) Theme

LEGEND :

-  Topographic Features
-  **YELLOW** <1:10 slopes
ORANGE 1:10 - 1:4 slopes,
RED >1:4 + slopes
-  Drainage Courses
-  Farmsteads
-  District Roads







Substation, O&M Buildings and BESS Complex

base map : NGI 50K Topographic Series : 3024 AB Jakkalskuil, AD Philipstown

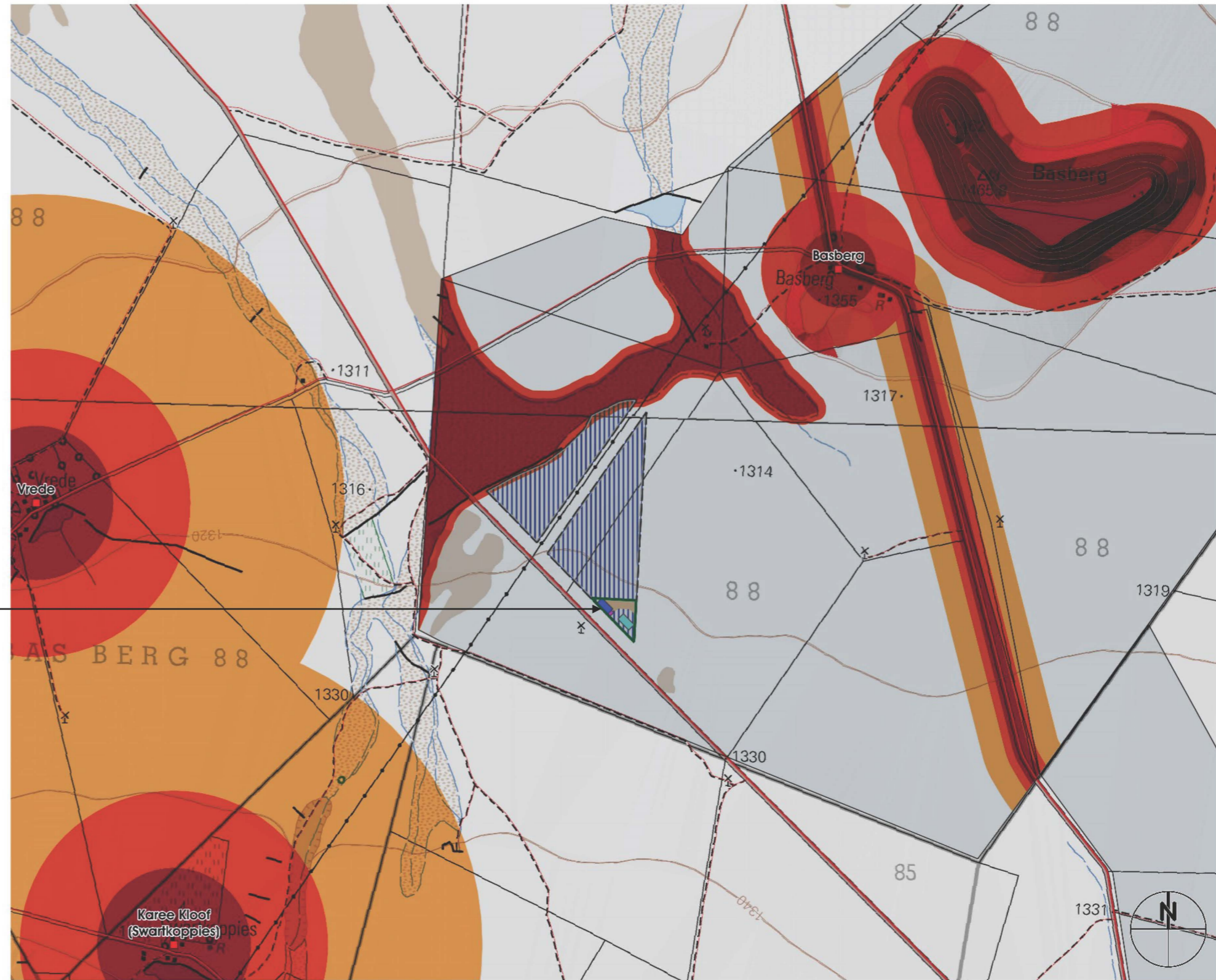


map 9 : KUDU SPV 3 • Visual Features

VISUAL SENSITIVITY

-  Very High - NoGo
-  High Visual Sensitivity
-  Medium Visual Sensitivity
-  Low Visual Sensitivity







Substation, O&M Buildings and BESS Complex

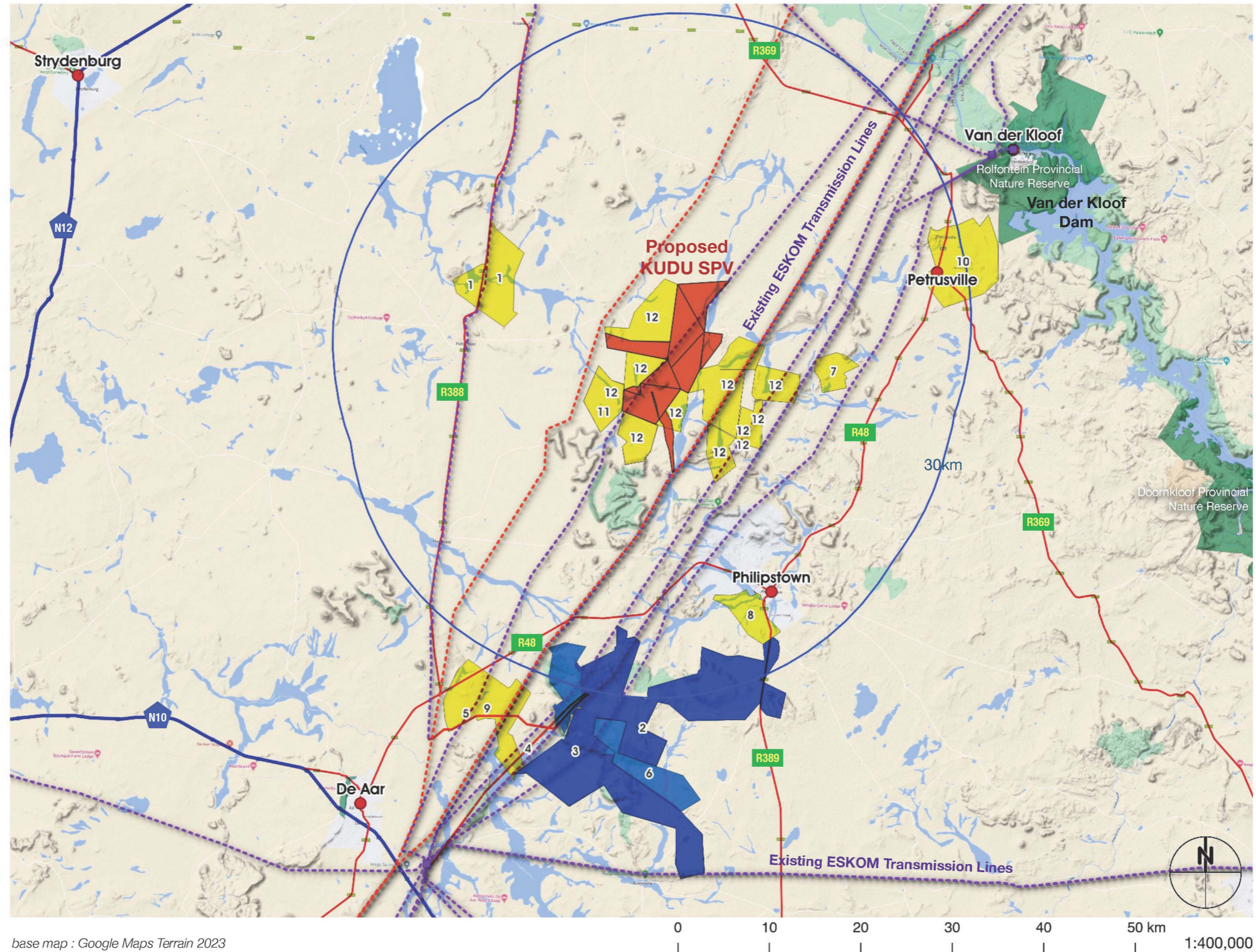


base map : NGI 50K Topographic Series : 3024 AB Jakkalskuil, AD Philipstown

map 10 : KUDU SPV 3 • Visual Sensitivity

LEGEND :

-  KUDU SPV Farm Properties
-  REEA Onshore Wind Energy Projects
-  REEA Solar PV Projects
-  SAPAD Protected Areas
-  Existing Eskom Transmission Lines
-  Proposed Eskom Transmission Lines



map 11 : KUDU SPV Cumulative Renewable Energy Projects • REEA - SAHRIS Projects 25/04/2023



vp5 : Looking North East from Karee Kloof farm road

30.281137S 24.276414E Distance 3.75km

Appendix A: Visual Specialist Expertise

Bernard Oberholzer, Landscape Architect
PO Box 471, Stanford, Western Cape, 7210
Email: bernard.bola@gmail.com

Quinton Lawson, Architect
8 Blackwood Drive, Hout Bay 7806
Email: quinton@openmail.co.za

Expertise

Bernard Oberholzer has a Bachelor of Architecture (UCT) and Master of Landscape Architecture (U. of Pennsylvania), and has more than 25 years' experience in undertaking visual impact assessments. He has presented papers on *Visual and Aesthetic Assessment Techniques*, and is the author of *Guideline for Involving Visual and Aesthetic Specialists in EIA Processes*, prepared in association with the CSIR for the Dept. of Environmental Affairs and Development Planning, Provincial Government of the Western Cape, 2005.

Quinton Lawson has a Bachelor of Architecture Degree (Natal) and has more than 15 years' experience in visual assessments, specializing in 3D modelling and visual simulations. He has previously lectured on visual simulation techniques in the Master of Landscape Architecture Programme at UCT.

The authors have been involved in visual assessments for a wide range of residential, industrial and renewable energy projects. They prepared the 'Landscape/Visual Assessment' chapter in the report for the *National Wind and Solar PV Strategic Environmental Assessment (SEA)*, as well as the *National Electricity Grid Infrastructure SEA* in association with the CSIR, for the Department of Environmental Affairs in 2014-2015.

Appendix B: Specialist Statement of Independence



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

DETAILS OF THE SPECIALIST, DECLARATION OF INTEREST AND UNDERTAKING UNDER OATH

File Reference Number:	(For official use only)
NEAS Reference Number:	DEA/EIA/
Date Received:	

Application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

PROJECT TITLE

Scoping and Environmental Impact Assessment Processes for the Proposed Development of 12 Solar Photovoltaic (PV) Facilities and associated infrastructure (i.e. Kudu Solar Facility 1 - 12), near De Aar, Northern Cape

Kindly note the following:

1. This form must always be used for applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting where this Department is the Competent Authority.
2. This form is current as of 01 September 2018. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at <https://www.environment.gov.za/documents/forms>.
3. A copy of this form containing original signatures must be appended to all Draft and Final Reports submitted to the department for consideration.
4. All documentation delivered to the physical address contained in this form must be delivered during the official Departmental Officer Hours which is visible on the Departmental gate.
5. All EIA related documents (includes application forms, reports or any EIA related submissions) that are faxed; emailed; delivered to Security or placed in the Departmental Tender Box will not be accepted, only hardcopy submissions are accepted.

Departmental Details

Postal address:

Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Private Bag X447
Pretoria
0001

Physical address:

Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Environment House
473 Steve Biko Road
Arcadia

Queries must be directed to the Directorate: Coordination, Strategic Planning and Support at:
Email: EIAAdmin@environment.gov.za

1. SPECIALIST INFORMATION

Specialist Company Name:	BOLA		
B-BBEE	Contribution level (indicate 1 to 8 or non-compliant)	Level 5	Percentage Procurement recognition
Specialist name:	Bernard Oberholzer		
Specialist Qualifications:	B.Arch, MLA		
Professional affiliation/registration:	SACLAP		
Physical address:	16 Caledon Street		
Postal address:	PO Box 471, Stanford		
Postal code:	7210	Cell:	
Telephone:	083 513 5696	Fax:	
E-mail:	bernard.bola@gmail.com		

2. DECLARATION BY THE SPECIALIST

I, B. Oberholzer, declare that –

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- all the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.



Signature of the Specialist



Name of Company:



Date

Details of Specialist, Declaration and Undertaking Under Oath

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, B. Oberholzer, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.

BJO
Signature of the Specialist

BOLA
Name of Company

20 May 2023
Date

Karin Sfreddo
Signature of the Commissioner of Oaths

20 May 2023
Date



ENVIRONMENTAL IMPACT ASSESSMENT REPORT: Scoping and Environmental Impact Assessment (EIA)
Process for the Proposed Development of a Solar Photovoltaic (PV) Facility (Kudu Solar Facility 3)
and associated infrastructure, near De Aar, Northern Cape Province



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

DETAILS OF THE SPECIALIST, DECLARATION OF INTEREST AND UNDERTAKING UNDER OATH

	(For official use only)
File Reference Number:	
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Kindly note the following:

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3. A copy of this form containing original signatures must be appended to all Draft and Final Reports submitted to the department for consideration.
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473 Steve Biko Road
Arcadia

Queries must be directed to the Directorate: Coordination, Strategic Planning and Support at:
Email: EIAAdmin@environment.gov.za

1. SPECIALIST INFORMATION

Specialist Company Name:	qarc			
B-BBEE	Contribution level (indicate 1 to 8 or non-compliant)	4	Percentage Procurement recognition	100%
Specialist name:	Quinton Lawson			
Specialist Qualifications:	BArch (Natal)			
Professional affiliation/ registration:	SACAP 3686			
Scientific Organisation Registration / Member Number	-			
Status of Registration / Membership	Current			
Physical address:	8 Blackwood Drive, Hout Bay, Cape Town			
Postal address:	As above			
Postal code:	7806	Cell:	083 309 3338	
Telephone:	021 790 5119	Fax:	-	
E-mail:	quinton@openmail.co.za			

2. DECLARATION BY THE SPECIALIST

I, **Quinton Lawson**, declare that –

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- all the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.

Details of Specialist, Declaration and Undertaking Under Oath

Page 2 of 3



Signature of the Specialist

qarc


Name of Company:

14 / 06 / 2023

Date

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, **Quinton Lawson**, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.



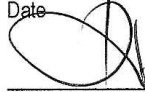
Signature of the Specialist

qarc

Name of Company

14 / 06 / 2023

Date



Signature of the Commissioner of Oaths

14 / 06 / 2023

Date

I certify that the DEPONENT has acknowledged that he / she knows and understands the contents of this affidavit, that he / she does not have any objection to taking the oath, and that he / she considers it to be binding on his / her conscience, and which was sworn to and signed before me and that the administering oath complied with regulations contained in Government Gazette No. R 1258 of 21 July 1972, as amended.

SIGNATURE

Commissioner of Oaths

Designation: BRANCH MANAGER ex officio Republic of South Africa

Date: 14 JUNE 2023

Place: HOUTBAAI

Business Address: NTAALSTREAM CENTRE HOUTBAAI



Appendix C: Site Sensitivity Verification

Part A of the Assessment Protocols published in Government Notice (GN) 320 on 20 March 2020 (i.e. Site sensitivity verification requirements where a specialist assessment is required but no specific assessment protocol has been prescribed) is applicable where the Department of Forestry, Fisheries and the Environment (DFFE) Screening Tool has the relevant themes to verify. This is applicable to the Visual Impact Assessment, as the Landscape Theme relevant to Solar PV developments is relevant.

Prior to commencing with the specialist assessment in accordance with Appendix 6 of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) Environmental Impact Assessment (EIA) Regulations of 2014, a site sensitivity verification was undertaken in order to confirm the current land use and environmental sensitivity of the proposed project area as identified by the DFFE National Web-Based Environmental Screening Tool (Screening Tool).

The details of the site sensitivity verification are noted below:

Date of Site Visit	15 and 16 March 2022
Specialist Name	Bernard Oberholzer and Quinton Lawson
Professional Registration Number	South African Council for the Landscape Architectural Profession (SACLAP) 87018 South African Council for the Architectural Profession (SACAP) 3686
Specialist Affiliation / Company	BOLA and QARC

The site sensitivity verification was undertaken using the following means:

- (a) desk top analysis, using 1:50 000 topographic series maps and Google Earth satellite imagery;
- (b) preliminary on-site inspection; and
- (c) various databases, including the South African Protected Areas Database (SAPAD).

A screening report was compiled using the DFFE Screening Tool. The Report includes a 'Map of Relative Landscape (Solar) Theme Sensitivity', based on mapping prepared for the Phase 1 Wind and Solar SEA by the CSIR for DFFE in 2015 (DEA, 2015).

The current visual sensitivity mapping included in this Visual Impact Assessment is in greater detail (at the site scale) for the proposed solar photovoltaic (PV) study area, taking into account detailed viewshed mapping and local site conditions.

Outcome of the site sensitivity verification:

- (a) The DFFE screening tool findings for the Landscape Theme (Figure 1 below) was refined, based on more detailed project-scale mapping of landscape features.
- (b) Evidence is provided by means of detailed feature mapping and the application of visual sensitivity buffers as contained in the Visual Impact Assessment Report. (Figure 2 below).

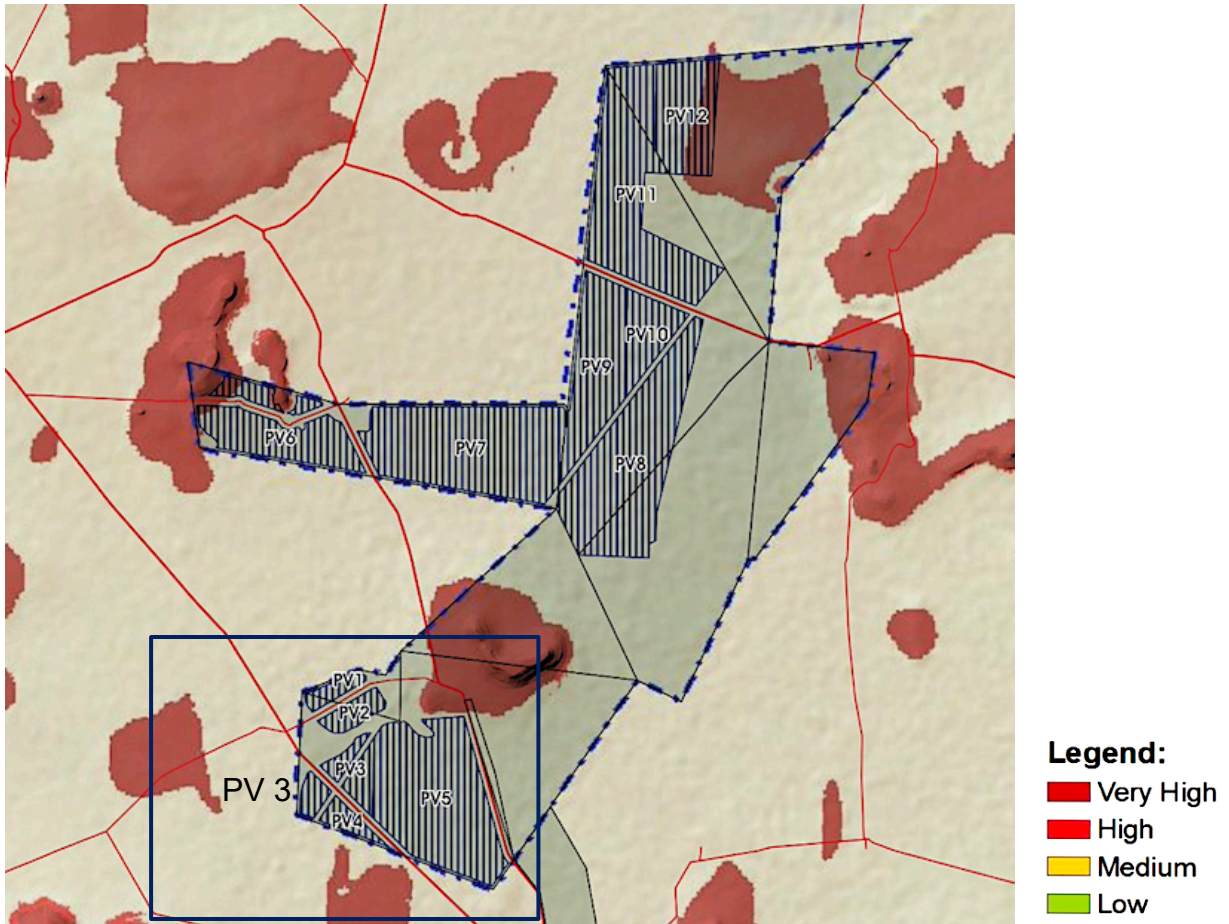


Figure 1

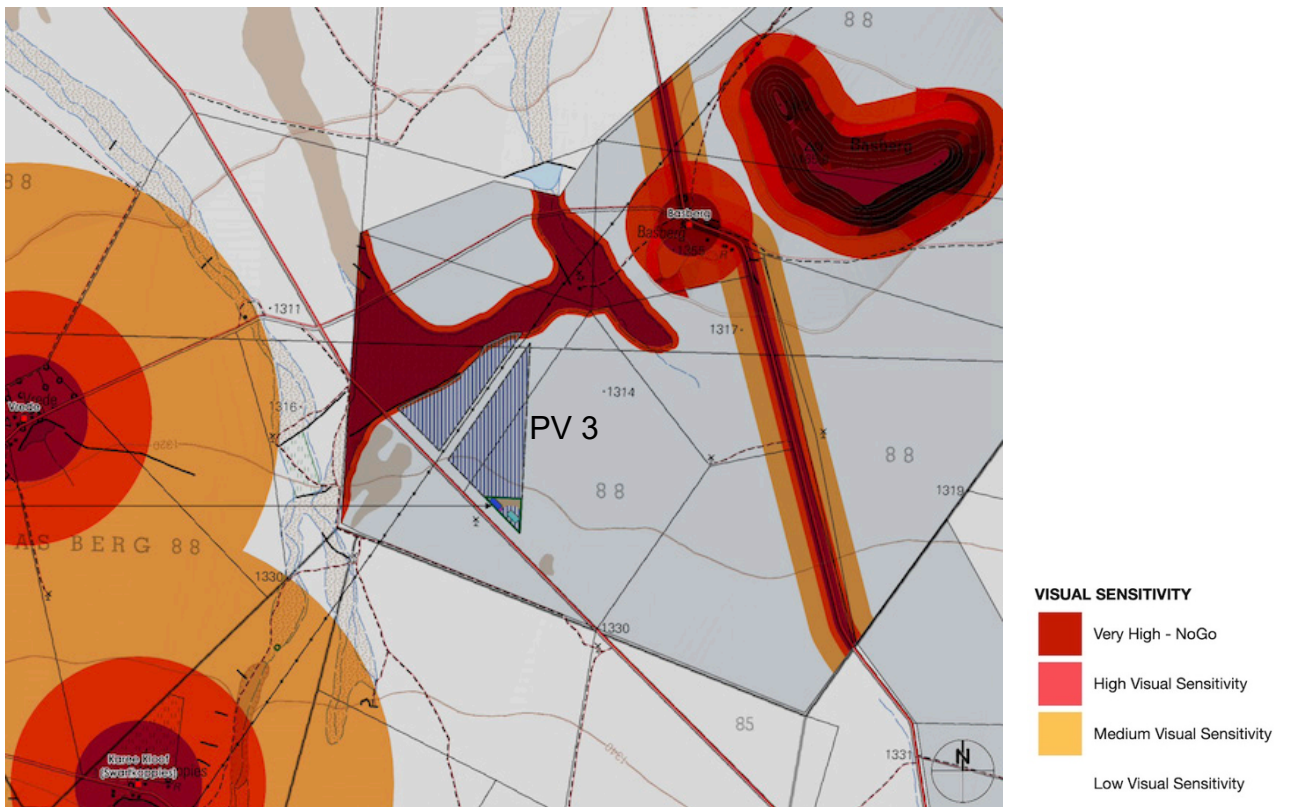


Figure 2

Appendix D: Impact Assessment Methodology

The impact assessment includes:

- *the nature, status, significance and consequences of the impact and risk;*
- *the extent and duration of the impact and risk;*
- *the probability of the impact and risk occurring;*
- *the degree to which impacts and risks can be mitigated;*
- *the degree to which the impacts and risks can be reversed; and*
- *the degree to which the impacts and risks can cause loss of irreplaceable resources.*

Terminology used in impact assessment can overlap. To avoid ambiguity, please note the following clarifications (that are based on NEMA and the EIA Regulations):

- *The term environment is understood to have a broad interpretation that includes both the natural (biophysical) environment and the socio-economic environment. The term socio-ecological system is also used to describe the natural and socio-economic environment and the interactions amongst these components.*
- *Significance = Consequence x Probability, which means that significance is equivalent to risk.*
- *The impact can have a positive or negative status. The significance of a negative impact may be called a risk, and the significance of a positive impact may be called an opportunity.*

The following principles are to underpin the application of this methodology:

- *Transparent and repeatable process - specialists are to describe the thresholds and limits they apply in their assessment, wherever possible.*
- *Adapt parameters to context (where justified) – the methodology proposes some thresholds (e.g. for spatial extent, in Step 3 below), however, if the nature of the impact requires a different definition of the categories of spatial extent, then this can be provided and described.*
- *Combination of a quantitative and qualitative assessment – where possible, specialists are to provide quantitative assessments (e.g. areas of habitat affected, decibels of noise, number of jobs), however, it is recognised that not all impacts can be quantified, and then qualitative assessments are to be provided.*

As per the DFFE Guideline 5: Assessment of Alternatives and Impacts, the following methodology is applied to the prediction and assessment of impacts and risks. Potential impacts and risks have been rated in terms of the direct, indirect and cumulative:

- *Direct impacts are impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity. These impacts are usually associated with the construction, operation or maintenance of an activity and are generally obvious and quantifiable.*
- *Indirect impacts of an activity are indirect or induced changes that may occur as a result of the activity. These types of impacts include all the potential impacts that do not manifest immediately when the activity is undertaken or which occur at a different place as a result of the activity.*
- *Cumulative impacts are impacts that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities. Cumulative impacts can occur from the collective impacts of individual minor actions over a period of time and can include both direct and indirect impacts.*

The impact assessment methodology includes the aspects described below.

- **Step 1: Nature** of impact/risk - *The type of effect that a proposed activity will have on the environment.*

- **Step 2: Status** - Whether the impact/risk on the overall environment will be:
 - Positive - environment overall will benefit from the impact/risk;
 - Negative - environment overall will be adversely affected by the impact/risk; or
 - Neutral - environment overall not be affected.

- **Step 3: Qualitatively determine the consequence of the impact/risk by identifying the a) SPATIAL EXTENT; b) DURATION; c) REVERSIBILITY; AND d) IRREPLACEABILITY.**
 - **A) Spatial extent** – The size of the area that will be affected by the impact/risk:
 - Site specific;
 - Local (<10 km from site);
 - Regional (<100 km of site);
 - National; or
 - International (e.g. Greenhouse Gas emissions or migrant birds).

 - **B) Duration** – The timeframe during which the impact/risk will be experienced:
 - Very short term (instantaneous);
 - Short term (less than 1 year);
 - Medium term (1 to 10 years);
 - Long term (the impact will cease after the operational life of the activity (i.e. the impact or risk will occur for the project duration)); or
 - Permanent (mitigation will not occur in such a way or in such a time span that the impact can be considered transient (i.e. the impact will occur beyond the project decommissioning)).

 - **C) Reversibility of the Impacts** - the extent to which the impacts/risks are reversible assuming that the project has reached the end of its life cycle (decommissioning phase):
 - High reversibility of impacts (impact is highly reversible at end of project life i.e. this is the most favourable assessment for the environment);
 - Moderate reversibility of impacts;
 - Low reversibility of impacts; or
 - Impacts are non-reversible (impact is permanent, i.e. this is the least favourable assessment for the environment).

 - **D) Irreplaceability of Receiving Environment/Resource Loss** caused by impacts/risks – the degree to which the impact causes irreplaceable loss of resources assuming that the project has reached the end of its life cycle (decommissioning phase):
 - High irreplaceability of resources (project will destroy unique resources that cannot be replaced, i.e. this is the least favourable assessment for the environment);
 - Moderate irreplaceability of resources;
 - Low irreplaceability of resources; or
 - Resources are replaceable (the affected resource is easy to replace/rehabilitate, i.e. this is the most favourable assessment for the environment).

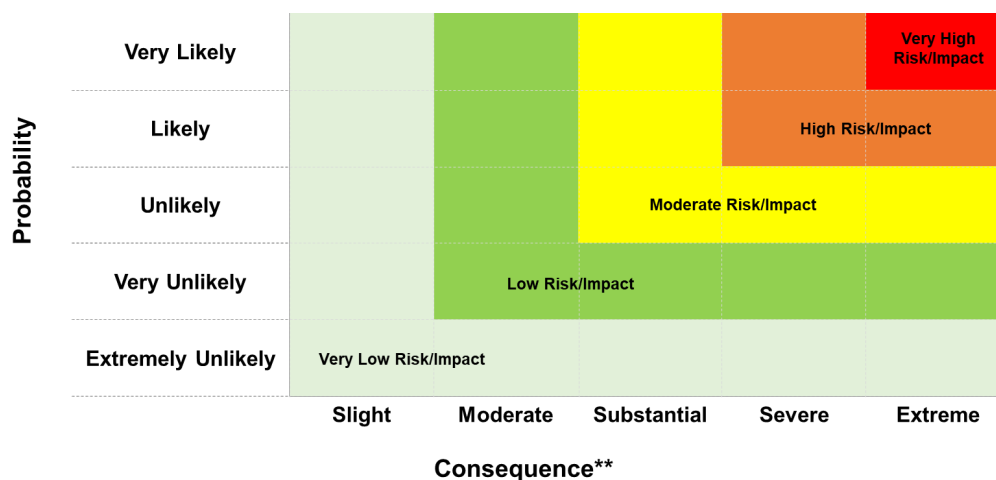
Some of the criteria are quantitative (e.g. spatial extent and duration) and some may be described in a quantitative or qualitative manner (e.g. reversibility and irreplaceability). The specialist then combines these criteria in a qualitative manner to determine the **consequence**.

The consequence terms ranging from slight to extreme must be calibrated per Specialist Study so that there is transparency and consistency in the way a risk/impact is measured. For example, from a biodiversity and ecology perspective, the consequence ratings could be defined according to a reduction in population or occupied area in relation to Species of Conservation Concern (SCC) status, ranging from slight consequence for defined areas of Least Concern, to extreme consequence for defined areas that are Critically Endangered. For example, from a social perspective, a slight consequence could refer to small and manageable impacts, or impacts on small sections of the community; a moderate consequence could refer to impacts which affect the bulk of the local population negatively or may produce a net negative impact on the community; and an extreme consequence could refer to impacts which could result in social or political violence or institutional collapse.

- **Consequence** – *The anticipated consequence of the risk/impact is generally defined as follows:*
 - *Extreme (extreme alteration of natural or socio-economic systems, patterns or processes, i.e. where environmental or socio-economic functions and processes are altered such that they permanently cease);*
 - *Severe (severe alteration of natural or socio-economic systems, patterns or processes, i.e. where environmental or socio-economic functions and processes are altered such that they temporarily or permanently cease);*
 - *Substantial (substantial alteration of natural or socio-economic systems, patterns or processes, i.e. where environmental or socio-economic functions and processes are altered such that they temporarily or permanently cease);*
 - *Moderate (notable alteration of natural or socio-economic systems, patterns or processes, i.e. where the natural or socio-economic environment continues to function but in a modified manner; or*
 - *Slight (negligible and transient alteration of natural or socio-economic systems, patterns or processes, i.e. where natural systems/environmental or socio-economic functions, patterns, or processes are not affected in a measurable manner, or if affected, that effect is transient and the system recovers).*

- **Step 4:** *Rate the **probability** of the impact/risk using the criteria below:*
 - **Probability** – *The probability of the impact/risk occurring:*
 - *Extremely unlikely (little to no chance of occurring);*
 - *Very unlikely (<30% chance of occurring);*
 - *Unlikely (30-50% chance of occurring)*
 - *Likely (51 – 90% chance of occurring); or*
 - *Very Likely (>90% chance of occurring regardless of prevention measures).*

- **Step 5:** *Use both the **consequence** and **probability** to determine the **significance** of the identified impact/risk (qualitatively as shown in Figure 1). Significance definitions and rankings are provided below:*



**[Qualitatively determined based on Spatial Extent, Duration, Reversibility and Irreplaceability]

Figure 1. Guide to assessing risk/impact significance as a result of consequence and probability.

- **Significance** – Will the impact cause a notable alteration of the environment?
 - Very low (the risk/impact may result in very minor alterations of the environment and can be easily avoided by implementing appropriate mitigation measures, and will not have an influence on decision-making);
 - Low (the risk/impact may result in minor alterations of the environment and can be easily avoided by implementing appropriate mitigation measures, and will not have an influence on decision-making);
 - Moderate (the risk/impact will result in moderate alteration of the environment and can be reduced or avoided by implementing the appropriate mitigation measures, and will only have an influence on the decision-making if not mitigated);
 - High (the risk/impact will result in major alteration to the environment even with the implementation on the appropriate mitigation measures and will have an influence on decision-making); and
 - Very high (the risk/impact will result in very major alteration to the environment even with the implementation on the appropriate mitigation measures and will have an influence on decision-making (i.e. the project cannot be authorised unless major changes to the engineering design are carried out to reduce the significance rating)).

With the implementation of mitigation measures, the residual impacts/risks are ranked as follows in terms of significance:

- Very low = 5;
- Low = 4;
- Moderate = 3;
- High = 2; and
- Very high = 1.

The specialists must provide a written supporting motivation of the assessment ratings provided.

- **Step 6: Determine the Confidence Level** – The degree of confidence in predictions based on available information and specialist knowledge:
 - Low;
 - Medium; or
 - High.

Appendix E: Appendix 6 of the 2014 NEMA EIA Regulations (as amended)

NEMA requirements for Specialist Reports		
	Specialist Report content as required by the NEMA 2014 EIA Regulations, as amended	Section
1 (1)(a)	(i) the specialist who prepared the report; and	Section 1 Appendix A
	(ii) the expertise of that specialist to compile a specialist report including a curriculum vitae;	
(b)	a declaration that the specialist is independent in a form as may be specified by the competent authority;	Appendix B
(c)	an indication of the scope of, and the purpose for which, the report was prepared;	Section 1
(cA)	an indication of the quality and age of the base data used for the specialist report;	Section 2
(cB)	a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 6
(d)	the duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment;	Section 2
(e)	a description of the methodology adopted in preparing the report or carrying out the specialised process, inclusive of equipment and modelling used;	Section 2
(f)	details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;	Section 6
(g)	an identification of any areas to be avoided, including buffers;	Section 4
(h)	a map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Map 10
(i)	a description of any assumptions made and any uncertainties or gaps in knowledge;	Section 2
(j)	a description of the findings and potential implications of such findings on the impact of the proposed activity, or activities;	Section 7
(k)	any mitigation measures for inclusion in the EMPr;	Section 6 tables
(l)	any conditions for inclusion in the environmental authorisation;	Section 6
(m)	any monitoring requirements for inclusion in the EMPr or environmental authorisation;	Section 6
(n)	a reasoned opinion-	Section 10
	(i) whether the proposed activity or portions thereof should be authorised; and	
	(iA) regarding the acceptability of the proposed activity or activities; and	
	(ii) if the opinion is that the proposed activity or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan;	
(o)	a description of any consultation process that was undertaken during the course of preparing the specialist report;	n/a
(p)	a summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	Section 5
(q)	any other information requested by the competent authority.	n/a
2	Where a government notice gazetted by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	Appendix C



CHAPTER II: Heritage Impact Assessment (Archaeology and Cultural Heritage)

HERITAGE SPECIALIST STUDY:

Scoping and Environmental Impact Assessment (EIA) Processes for the Proposed Development of a Solar Photovoltaic Facility (Kudu Solar Facility 3) and associated infrastructure, near De Aar, Northern Cape Province

Required under Section 38 (8) of the National Heritage Resources Act (No. 25 of 1999)

SAHRA Case ID: 20338

Report for:

CSIR – Environmental Management Services

P.O. Box 320, Stellenbosch, 7599

Email: RAbed@csir.co.za

On behalf of:

Kudu Solar Facility 3 (Pty) Ltd



Dr Jayson Orton

ASHA Consulting (Pty) Ltd

40 Brassie Street, Lakeside, 7945

Tel: (021) 788 1025 | 083 272 3225

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1st draft: 23 March 2023

Final report: 23 May 2023

Specialist declaration



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

DETAILS OF THE SPECIALIST, DECLARATION OF INTEREST AND UNDERTAKING UNDER OATH

File Reference Number:	(For official use only)
NEAS Reference Number:	DEA/EIA/
Date Received:	

Application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

PROJECT TITLE

Scoping and Environmental Impact Assessment (EIA) Processes for the Proposed Development of 12 Solar Photovoltaic Facilities (Kudu Solar Facilities 1 to 12) and associated infrastructure, near De Aar, Northern Cape Province

Kindly note the following:

1. This form must always be used for applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting where this Department is the Competent Authority.
2. This form is current as of 01 September 2018. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at <https://www.environment.gov.za/documents/forms>.
3. A copy of this form containing original signatures must be appended to all Draft and Final Reports submitted to the department for consideration.
4. All documentation delivered to the physical address contained in this form must be delivered during the official Departmental Officer Hours which is visible on the Departmental gate.
5. All EIA related documents (includes application forms, reports or any EIA related submissions) that are faxed; emailed; delivered to Security or placed in the Departmental Tender Box will not be accepted, only hardcopy submissions are accepted.

Departmental Details

Postal address:
Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Private Bag X447
Pretoria
0001

Physical address:
Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Environment House
473 Steve Biko Road
Arcadia

Queries must be directed to the Directorate: Coordination, Strategic Planning and Support at:
Email: EIAAdmin@environment.gov.za


1. SPECIALIST INFORMATION

Specialist Company Name:	ASHA Consulting (Pty) Ltd		
B-BBEE	Contribution level (indicate 1 to 8 or non-compliant)	4	Percentage Procurement recognition
			0
Specialist name:	Dr Jayson Orton		
Specialist Qualifications:	D.Phil (Archaeology, Oxford, UK) MA (Archaeology, UCT)		
Professional affiliation/registration:	ASAPA CRM member No. 233 APHP member No. 043		
Physical address:	40 Brassie Street, Lakeside, 7945		
Postal address:	40 Brassie Street, Lakeside		
Postal code:	7945	Cell:	083 272 3225
Telephone:	021 788 1025	Fax:	n/a
E-mail:	jayson@asha-consulting.co.za		

2. DECLARATION BY THE SPECIALIST

I, JAYSON ORTON, declare that -

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- all the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.

Signature of the Specialist 

ASHA CONSULTING (PTY) LTD

Name of Company:

19-05-2023

Date

Details of Specialist, Declaration and Undertaking Under Oath

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, JAYSON OETON, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.

[Signature]
Signature of the Specialist

ASHA CONSULTING (PTY) LTD
Name of Company

19-05-2023
Date

[Signature] SGT
Signature of the Commissioner of Oaths

2023-05-19
Date



EXECUTIVE SUMMARY

ASHA Consulting (Pty) Ltd was appointed by the Council for Scientific and Industrial Research (CSIR) to assess the potential impacts to heritage resources that might occur through the proposed development of a suite of twelve photovoltaic (PV) solar energy facilities (SEFs) to be located between 50 km and 66 km northeast of De Aar, Northern Cape. They will be named Kudu PV1 SEF, Kudu PV2 SEF, etc. The present report pertains to the Kudu PV3 SEF which has a centre point at S30° 15' 19.2" E24° 18' 27.1".

The wider site was assessed in the field over 4 days and found to be covered in very dense grass which made visibility extremely poor. However, several dolerite hills and outcrops were encountered and visibility was better on those. Fieldwork was thus focused on the visible dolerite with the open grasslands receiving very little attention. Desktop work and previous experience suggested that significant heritage resources were likely to be very rare in the open grasslands with most heritage focused on the rocky areas. Ephemeral scatters of Pleistocene-aged MSA artefacts were seen in the grasslands in a few denuded areas and the Basberg farm graveyard and some animal watering points of varying age were also located in the grassland. All other resources were associated with rocky outcrops and included LSA engravings, a rock gong, historical engravings, historical stone walling (related to agricultural uses and also to the Anglo-Boer War) and farmsteads. The farmsteads were not on the outcrops but close to them.

No heritage resources were found within the Kudu PV3 site but the site does form part of the wider cultural landscape which would be altered if the facility was constructed.

All impacts were found to be of low to very low significance after mitigation and no fatal flaws were found. Given the lack of significant heritage on the PV3 site, it is the opinion of the heritage specialist that the proposed project should be authorised in full.

It is recommended that the proposed Kudu PV3 SEF be authorised, but subject to the following recommendations which should be included as conditions of authorisation:

- Visually permeable fences, preferably in a dark colour, should be used;
- Buildings to be painted in earthy colours to reduce contrast;
- Night-time light spillage should be minimised, possibly through the use of motion detectors so that the area can stay dark until light is needed; and
- If any archaeological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

Glossary

Background scatter: Artefacts whose spatial position is conditioned more by natural forces than by human agency

Early Stone Age: Period of the Stone Age extending approximately between 2 million and 200 000 years ago.

Holocene: The geological period spanning the last approximately 10-12 000 years.

Hominid: a group consisting of all modern and extinct great apes (i.e. gorillas, chimpanzees, orangutans and humans) and their ancestors.

Later Stone Age: Period of the Stone Age extending over the last approximately 20 000 years.

Middle Stone Age: Period of the Stone Age extending approximately between 200 000 and 20 000 years ago.

Patina: The weathered surface of an artefact which has changed colour and/or texture (patinated, patination).

Pleistocene: The geological period beginning approximately 2.5 million years ago and preceding the Holocene.

Abbreviations

APHP: Association of Professional Heritage Practitioners

ASAPA: Association of Southern African Professional Archaeologists

BA: Basic Assessment

CSIR: Council for Scientific and Industrial Research

CRM: Cultural Resources Management

DFFE: Department of Forestry, Fisheries and the Environment

EA: Environmental Authorisation

ECO: Environmental Control Officer

EGI: Electricity Grid Infrastructure

EIA: Environmental Impact Assessment

EMPr: Environmental Management Program

ESA: Early Stone Age

GPS: global positioning system

GP: General Protection

HIA: Heritage Impact Assessment

LSA: Later Stone Age

MSA: Middle Stone Age

NBKB: Ngwao-Boswa Ya Kapa Bokoni

NEMA: National Environmental Management Act (No. 107 of 1998)

NHRA: National Heritage Resources Act (No. 25) of 1999

PPP: Public Participation Process

REDZ: Renewable Energy Development Zone

SAHRA: South African Heritage Resources Agency

SAHRIS: South African Heritage Resources Information System

Compliance with Appendix 6 of the 2014 EIA Regulations

Requirements of Appendix 6 – GN R326 (7 April 2017)	Addressed in the Specialist Report
1. (1) A specialist report prepared in terms of these Regulations must contain-	Section 1.4 Appendix 1
a) details of-	
i. the specialist who prepared the report; and	
ii. the expertise of that specialist to compile a specialist report including a curriculum vitae;	
b) a declaration that the specialist is independent in a form as may be specified by the competent authority;	Page ii (Preliminary Section of this report)
c) an indication of the scope of, and the purpose for which, the report was prepared;	Section 1.3
(cA) an indication of the quality and age of base data used for the specialist report;	Section 3
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Sections 7.6, 7.4 & 7.8
d) the duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment;	Section 3.2
e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used;	Section 3
f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying alternatives;	Sections 1.1.3 & 5 Appendix 3
g) an identification of any areas to be avoided, including buffers;	Section 11
h) a map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Appendix 3
i) a description of any assumptions made and any uncertainties or gaps in knowledge;	Section 3.6
j) a description of the findings and potential implications of such findings on the impact of the proposed activity or activities;	Section 5 Section 11
k) any mitigation measures for inclusion in the EMPr;	Section 10
l) any conditions for inclusion in the environmental authorisation;	Section 12
m) any monitoring requirements for inclusion in the EMPr or environmental authorisation;	Section 10
n) a reasoned opinion-	Sections 11.1 & 12
i. whether the proposed activity, activities or portions thereof should be authorised;	
(iA) regarding the acceptability of the proposed activity and activities; and	
ii. if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan;	
o) a description of any consultation process that was undertaken during the course of preparing the specialist report;	Section 3.7
p) a summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	Section 6.1
q) any other information requested by the competent authority.	Not Applicable
2. Where a government notice gazetted by the Minister provides for any protocol of minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply	Part A of the Assessment Protocols published in Government Notice No. 320 on 20 March 2020 is applicable (i.e. Site sensitivity verification requirements where a specialist assessment is required but no specific assessment protocol has been prescribed). See Appendix 3.

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1. INTRODUCTION

ASHA Consulting (Pty) Ltd was appointed by the Council for Scientific and Industrial Research (CSIR) to conduct an assessment of the potential impacts to heritage resources that might occur through the proposed development of a suite of twelve photovoltaic (PV) solar energy facilities (SEFs) to be located between 50 km and 66 km northeast of De Aar, Northern Cape (Figure 1). They will be named Kudu PV1 SEF, Kudu PV2 SEF, etc. The present report pertains to the Kudu PV3 SEF which has a centre point at S30° 15' 19.2" E24° 18' 27.1" (Figure 2). The properties affected are shown in Table 1.

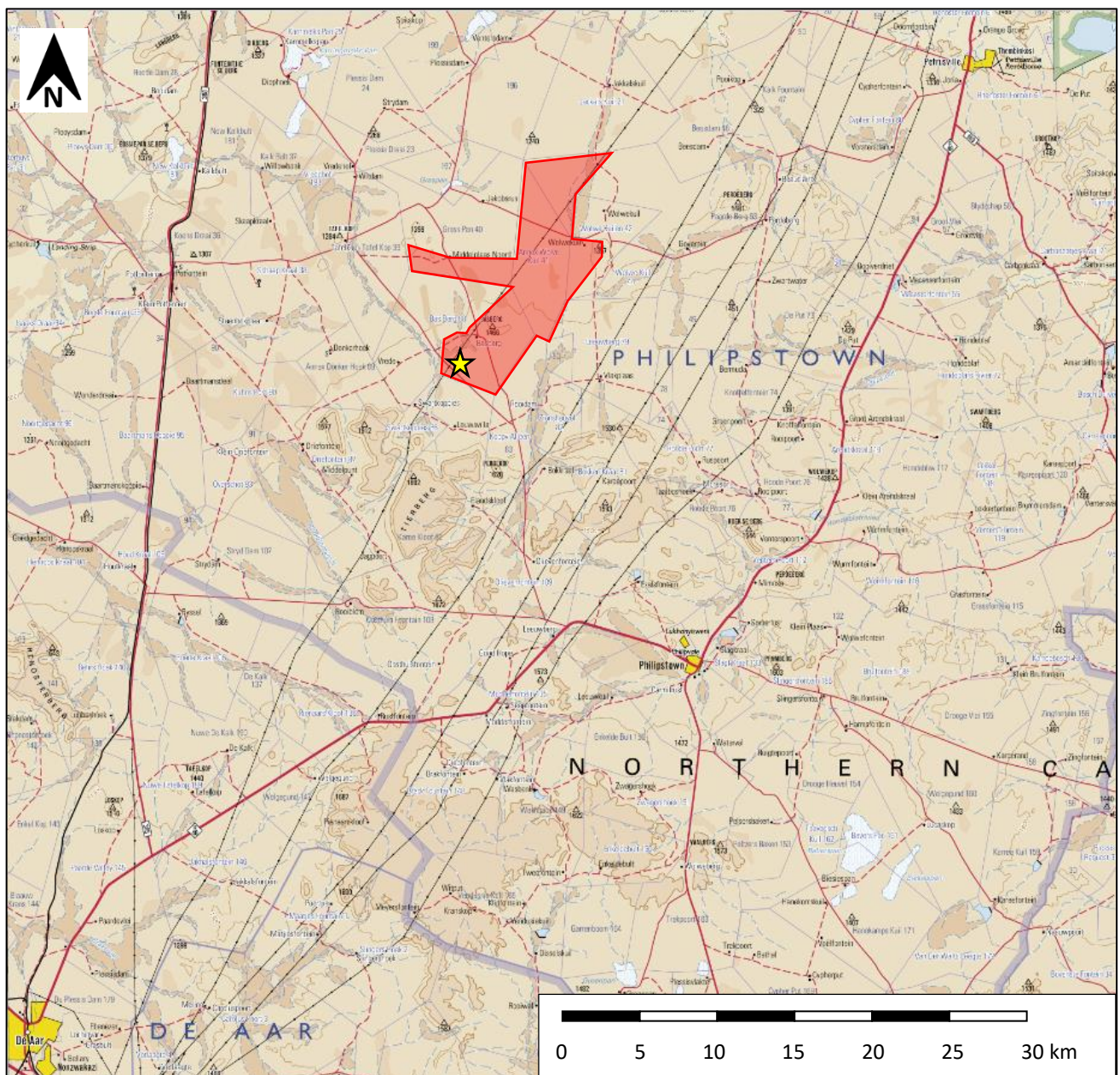


Figure 1: Extract from 1:250 000 topographic map 3024 showing the location of the broader study area (red shaded polygon) in relation to De Aar and Philipstown. The approximate location of PV3 is starred. Source: Chief Directorate: National Geo-Spatial Information. Website: www.ngi.gov.za.

Table 1: List of farm portions included in the overall study area with an indication of which farm portions are affected by each proposed Kudu PV project.

Farm Portions Affected	Kudu PV facility												
	1	2	3	4	5	6	7	8	9	10	11	12	
Remaining Extent of the Farm Bas Berg No. 88	X	X											
Remaining Extent of Portion 3 of the Farm Bas Berg No. 88	X	X	X	X	X								
Portion 4 (Portion of Portion 3) of the Farm Bas Berg No. 88													
Remaining Extent of Portion 2 (Middel Plaats) (a Portion of Portion 1) of the Farm Grass Pan No. 40 ¹							X	X					
Remaining Extent of the Farm Annex Wolve Kuil No. 41									X				
Portion 1 (Wolve Kuil West) of the Farm Annex Wolve Kuil No. 41								X	X	X	X		
Remaining Extent of the Farm Wolve Kuilen No. 42													
Portion 2 of the Farm Wolve Kuil No. 43													X

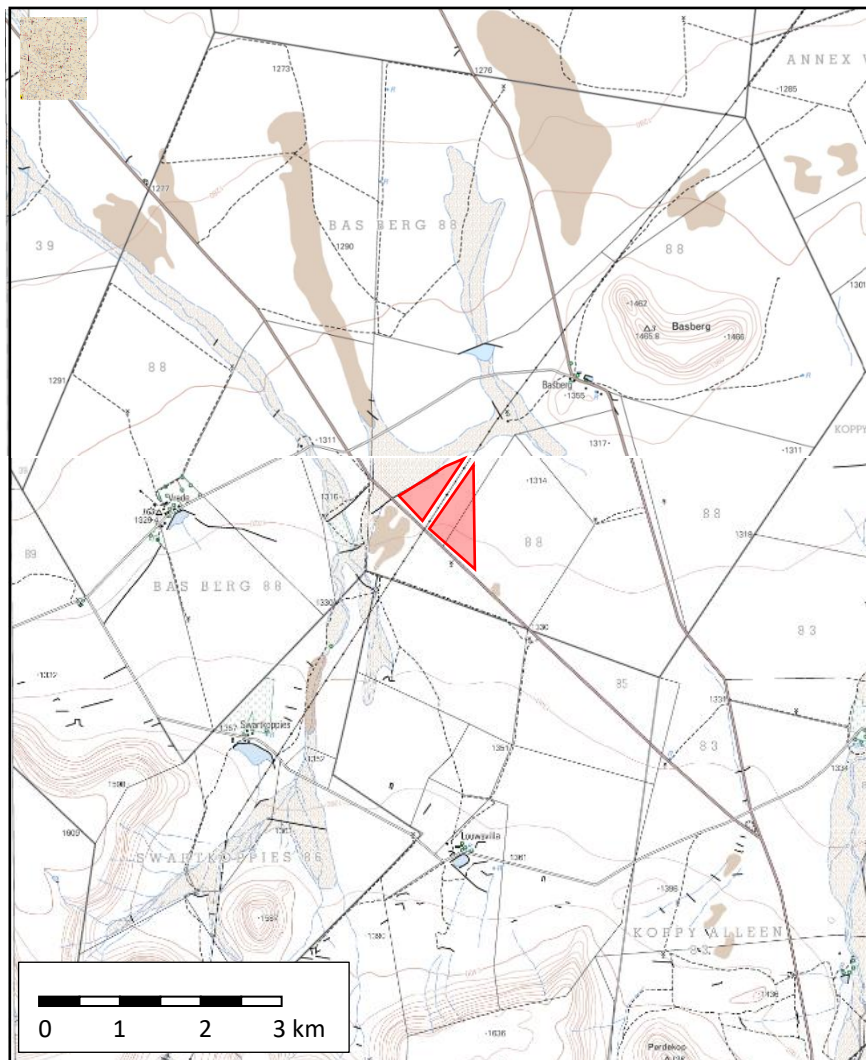


Figure 2: Extract from 1:50 000 topographic map 3024AB & AD showing the location of the PV3 site (red polygon). Source: Chief Directorate: National Geo-Spatial Information. Website: www.ngi.gov.za.

¹ Note that although the topographic map and SG Diagram uses the spelling “Grass Pan, the current Title Deed shows the property name as “Grasspan”.

1.1. The proposed project

1.1.1. Project description

ABO Wind is proposing to develop twelve PV SEFs and associated Electrical Grid Infrastructure (EGI), north-east of the town of De Aar, in the Renosterberg Local Municipality and Pixley Ka Seme District Municipality, in the Northern Cape Province. The Kudu PV3 SEF will consist of the infrastructure described in Table 2 with the layout being as shown in Figure 3. Note that the Kudu EGI projects, Projects 13 to 26 are the subject of separate assessments that will be carried out at a later stage.

Table 2: Details of the proposed Kudu PV3 SEF.

Component	Description
Solar Field	
Type of Technology	Solar Photovoltaic (PV) Technology
Generation Capacity (Maximum Installed)	<ul style="list-style-type: none"> 50 MWac
Total developable area that includes all associated infrastructure within the fenced off area of the PV facility	<p>Revised Scoping Buildable Areas:</p> <ul style="list-style-type: none"> 70 ha
PV Panel Structure (with the following possible tracking and mounting systems): <ul style="list-style-type: none"> Single Axis Tracking structures (aligned north-south); Dual Axis Tracking (aligned east-west and north-south); Fixed Tilt Mounting Structure; Mono-facial Solar Modules; or Bifacial Solar Modules. 	<ul style="list-style-type: none"> <u>Height</u>: Approximately 3.5 m (maximum)
Building Infrastructure	
Auxiliary Buildings	<ul style="list-style-type: none"> <u>Type</u>: These include, but are not limited to, Operation and Maintenance (O&M) building / centre, site office, workshop, staff lockers, bathrooms/ablutions, warehouses, guard houses, etc. <u>Cumulative Footprint</u>: Approximately up to 5000 m² <u>Height</u>: Up to 10 m
Inverter/Transformer Stations	<ul style="list-style-type: none"> <u>Preliminary average number of stations</u>: 27 <u>Height</u>: Approximately 3 m <u>Footprint</u>: Approximately 220 m² each
On-site Substation Complex	<ul style="list-style-type: none"> <u>Components of the on-site substation complex</u>: <ul style="list-style-type: none"> On-site Independent Power Producer (IPP) or Facility Substation (~1 ha). Lithium Ion or Redox Flow Battery Energy Storage System. Refer to the details below. Switching Station and Collector Station (~2 ha). This forms part of Projects 13 – 24 and will be assessed as part of separate processes. <u>Footprint of the on-site substation complex</u>: Up to approximately 8 ha

	<ul style="list-style-type: none"> ▪ <u>Height of the on-site substation complex</u>: Up to 10 m ▪ <u>Capacity of the on-site substation complex</u>: This varies according to the detailed design and requirements from potential clients, however a capacity stepping up from 22 kV or 33 kV to 132 kV is estimated.
Associated Infrastructure	
Battery Energy Storage System (BESS)	<ul style="list-style-type: none"> ▪ <u>Technology</u>: Lithium-Ion BESS or Redox Flow BESS (both options considered in the Scoping and EIA Process) ▪ <u>Footprint</u>: Approximately 1 ha ▪ <u>Height</u>: Up to 10 m ▪ <u>Capacity</u>: Up to 500 MW / 500 MWh
On-site medium voltage internal cables	<ul style="list-style-type: none"> ▪ <u>Placement</u>: Underground or above ground in certain sections ▪ <u>Capacity</u>: 22 or 33 kV ▪ <u>Depth</u>: Maximum depth of 1.5 m
Underground low voltage cables or cable trays	<ul style="list-style-type: none"> ▪ <u>Depth</u>: Maximum depth of 1.5 m
Access roads (including upgrading and widening of existing roads, where relevant)	<ul style="list-style-type: none"> ▪ <u>Details</u>: Existing roads will be used as far as practically achievable, with some intersections potentially needing widening and some roads potentially needing upgrading.
Internal roads	<ul style="list-style-type: none"> ▪ <u>Details</u>: New internal service roads will need to be established. These would either comprise farm roads (compacted dirt/gravel) or paved roads. ▪ <u>Width</u>: Approximately 4 – 5 m
Fencing around the PV Facility Perimeter	<ul style="list-style-type: none"> ▪ <u>Type</u>: Could be palisade or mesh or fully electrified ▪ <u>Height</u>: Up to 3 m
Storm water channels	<ul style="list-style-type: none"> ▪ Details to be confirmed once the Engineering, Procurement and Construction (EPC) contractor has been selected and the design is finalised. Where necessary, a detailed storm water management plan would need to be developed.
Panel cleaning and maintenance area	<ul style="list-style-type: none"> ▪ Refer to the EIA Report for information
Work area during the construction phase (i.e. laydown area)	<ul style="list-style-type: none"> ▪ Temporary Laydown: Up to 7 ha.
Water Requirements	<ul style="list-style-type: none"> ▪ Approximately 9 000 m³ of water is estimated to be required per year for the construction phase. ▪ Approximately 1 000 m³ of water is estimated to be required per year for the operational phase. ▪ Water requirements during the decommissioning phase are unknown at this stage. ▪ Potential sources: Local municipality, third-party water supplier, existing boreholes or drilled boreholes on site.
Construction Period	<ul style="list-style-type: none"> ▪ 12 – 18 months
Operational Period	<ul style="list-style-type: none"> ▪ Once the commercial operation date is achieved, the proposed facility will generate electricity for a minimum period of 20 years.

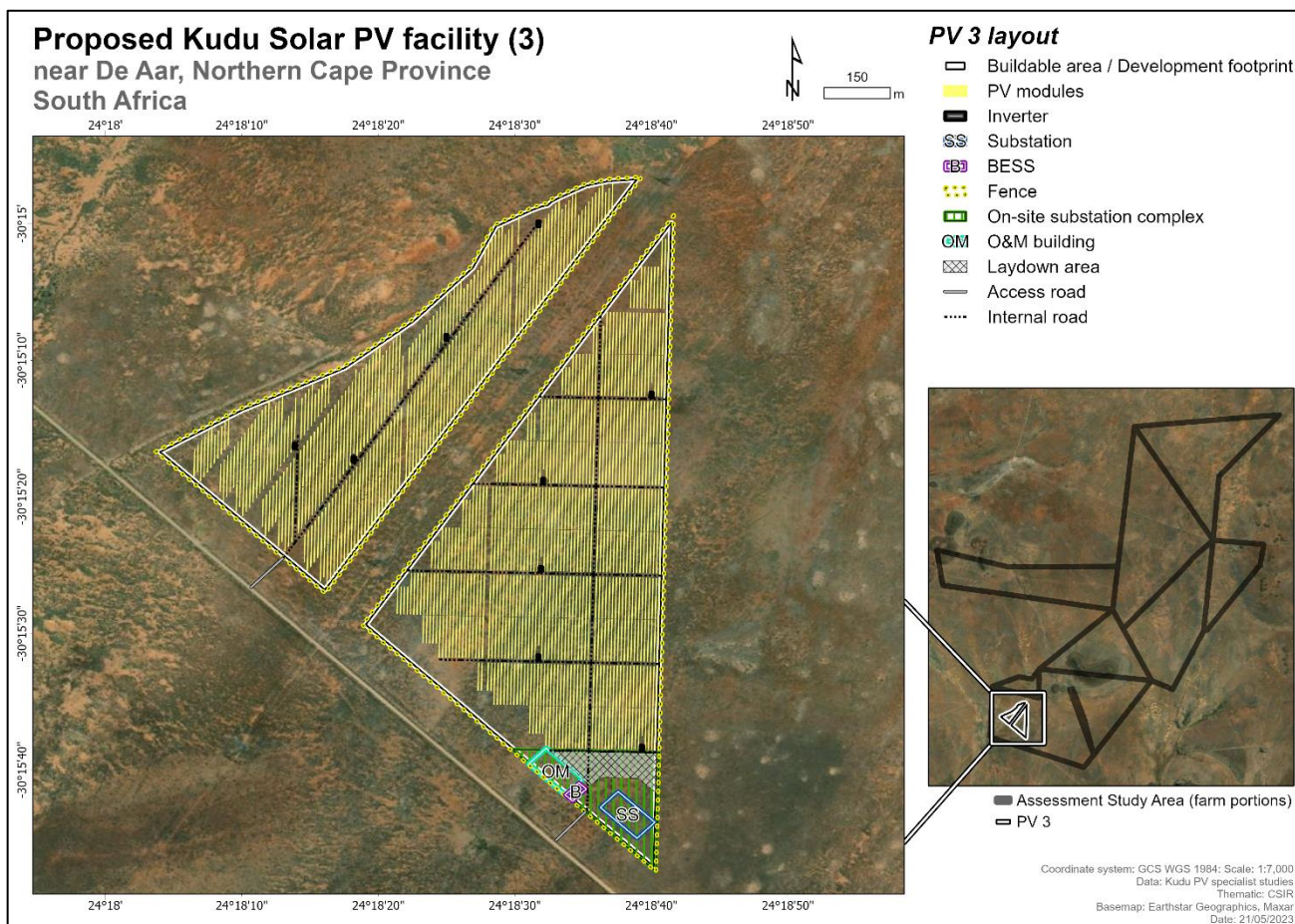


Figure 3: Map showing the layout of the proposed project.

1.1.2. Identification of alternatives

No alternative sites have been examined because the assessment process started with a larger site (i.e. study area consisting of eight farm portions totalling 8 150 ha) and the final footprint has been selected based on the lack of sensitive environmental features. Two different battery technologies are being considered, but this makes no difference to the heritage assessment and, being equally acceptable, they are not assessed separately in this report.

1.1.3. Description of project aspects relevant to the heritage study

All aspects of the proposed development are relevant, since excavations for foundations may impact on archaeological and/or palaeontological remains, while the above-ground aspects create potential visual (contextual) impacts to the cultural landscape and any significant heritage sites that might be visually sensitive.

1.2. Terms of reference

ASHA Consulting was asked to:

- Conduct a field survey to search for sensitive areas and sites of heritage significance;

- Provide mapping data indicating where sensitive features lay;
- Compile separate impact assessment reports per project including the following:
 - Describe regional and local features of the receiving environment;
 - Map sensitive features;
 - Assess (identify and rate) the potential impacts on the environment;
 - Identify relevant legislation and legal requirements; and
 - Provide recommendations on possible mitigation measures, rehabilitation procedures, and management guidelines.

1.3. Scope, purpose and objectives of the report

A heritage impact assessment (HIA) is a means of identifying any significant heritage resources before development begins so that these can be managed in such a way as to allow the development to proceed (if appropriate) without undue impacts to the fragile heritage of South Africa. This HIA report aims to fulfil the requirements of the heritage authorities such that a comment can be issued by them for consideration by the National Department of Forestry and Fisheries and Environment (DFFE) who will review the Environmental Impact Assessment (EIA) and grant or refuse authorisation. The HIA report will outline any management and/or mitigation requirements that will need to be complied with from a heritage point of view and that should be included in the conditions of authorisation should this be granted.

1.4. Details of specialist

This specialist assessment has been undertaken by Dr Jayson Orton of ASHA Consulting (Pty) Ltd. He has an MA (UCT, 2004) and a D.Phil (Oxford, UK, 2013), both in archaeology, and has been conducting Heritage Impact Assessments and archaeological specialist studies in South Africa (primarily in the Western Cape and Northern Cape provinces) since 2004 (please see curriculum vitae included as Appendix 1). He has also conducted research on aspects of the Later Stone Age in these provinces and published widely on the topic. He is an accredited heritage practitioner with the Association of Professional Heritage Practitioners (APHP; Member #43) and also holds archaeological accreditation with the Association of Southern African Professional Archaeologists (ASAPA) CRM section (Member #233) as follows:

- Principal Investigator: Stone Age, Shell Middens & Grave Relocation; and
- Field Director: Colonial Period & Rock Art.

A signed specialist statement of independence is included at the front of this specialist assessment.

2. LEGISLATIVE CONTEXT

2.1. National Heritage Resources Act (NHRA) No. 25 of 1999

The NHRA protects a variety of heritage resources as follows:

- Section 34: structures older than 60 years;
- Section 35: palaeontological, prehistoric and historical material (including ruins) more than 100 years old as well as military remains more than 75 years old;
- Section 36: graves and human remains older than 60 years and located outside of a formal cemetery administered by a local authority; and
- Section 37: public monuments and memorials.

Following Section 2, the definitions applicable to the above protections are as follows:

- Structures: “any building, works, device or other facility made by people and which is fixed to land, and includes any fixtures, fittings and equipment associated therewith”;
- Palaeontological material: “any fossilised remains or fossil trace of animals or plants which lived in the geological past, other than fossil fuels or fossiliferous rock intended for industrial use, and any site which contains such fossilised remains or trace”;
- Archaeological material: a) “material remains resulting from human activity which are in a state of disuse and are in or on land and which are older than 100 years, including artefacts, human and hominid remains and artificial features and structures”; b) “rock art, being any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or stone, which was executed by human agency and which is older than 100 years, including any area within 10m of such representation”; c) “wrecks, being any vessel or aircraft, or any part thereof, which was wrecked in South Africa, whether on land, in the internal waters, the territorial waters or in the maritime culture zone of the Republic, as defined respectively in sections 3, 4 and 6 of the Maritime Zones Act, 1994 (Act No. 15 of 1994), and any cargo, debris or artefacts found or associated therewith, which is older than 60 years or which SAHRA considers to be worthy of conservation”; and d) “features, structures and artefacts associated with military history which are older than 75 years and the sites on which they are found”;
- Grave: “means a place of interment and includes the contents, headstone or other marker of such a place and any other structure on or associated with such place”; and
- Public monuments and memorials: “all monuments and memorials a) “erected on land belonging to any branch of central, provincial or local government, or on land belonging to any organisation funded by or established in terms of the legislation of such a branch of government”; or b) “which were paid for by public subscription, government funds, or a public-spirited or military organisation, and are on land belonging to any private individual.”

Section 3(3) describes the types of cultural significance that a place or object might have in order to be considered part of the national estate. These are as follows:

- a) its importance in the community, or pattern of South Africa’s history;
- b) its possession of uncommon, rare or endangered aspects of South Africa’s natural or cultural heritage;
- c) its potential to yield information that will contribute to an understanding of South Africa’s natural or cultural heritage;

- d) its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- e) its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- f) its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- g) its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- h) its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa; and
- i) sites of significance relating to the history of slavery in South Africa.

While landscapes with cultural significance do not have a dedicated Section in the NHRA, they are protected under the definition of the National Estate (Section 3). Section 3(2)(c) and (d) list "historical settlements and townscapes" and "landscapes and natural features of cultural significance" as part of the National Estate. Furthermore, Section 3(3) describes the reasons a place or object may have cultural heritage value; some of these speak directly to cultural landscapes.

2.2. Approvals and permits

2.2.1. Assessment Phase

Section 38(8) of the NHRA states that if an impact assessment is required under any legislation other than the NHRA then it must include a heritage component that satisfies the requirements of S.38(3). Furthermore, the comments of the relevant heritage authority must be sought and considered by the consenting authority prior to the issuing of a decision. Under the National Environmental Management Act (No. 107 of 1998; NEMA), as amended, the project is subject to an EIA. The present report provides the heritage component. Ngwao-Boswa Ya Kapa Bokoni (Heritage Northern Cape; for built environment and cultural landscapes) and the South African Heritage Resources Agency (SAHRA; for archaeology and palaeontology) are required to provide comment on the proposed project in order to facilitate final decision making by the DFFE.

2.2.2. Construction Phase

If archaeological or palaeontological mitigation is required prior to construction, then the appointed archaeologist or palaeontologist would need to obtain a permit from SAHRA. This would be issued in their name. This is so that the heritage authority can ensure that the appointed practitioner has proposed an appropriate methodology that will result in the mitigation being done properly. A built environment permit, if required, would need to be obtained from the Provincial Heritage Resources Authority (PHRA).

2.3. Guidelines

SAHRA have issued minimum standards documents for archaeological and palaeontological specialist studies. There is also a Western Cape Provincial guideline for heritage specialists working in an EIA context and which is generally useful. The reporting has been prepared in accordance with these guidelines. The relevant documents are as follows:

- Winter, S. & Baumann, N. 2005. Guideline for involving heritage specialists in EIA processes: Edition 1. CSIR Report No ENV-S-C 2005 053 E. Republic of South Africa, Provincial Government of the Western Cape, Department of Environmental Affairs & Development Planning, Cape Town.
- SAHRA. 2007. Minimum Standards: archaeological and palaeontological components of impact assessment reports. Document produced by the South African Heritage Resources Agency, May 2007.

3. APPROACH AND METHODOLOGY

3.1. Literature survey and information sources

A survey of available literature was carried out to assess the general heritage context into which the development would be set. The information sources used in this report are presented in Table 3 with relevant dates of each source referenced in the text as needed. Data were also collected via a field survey. The data quality is suitable for the purpose of informing this report.

Table 3: Information sources used in this assessment.

Data / Information	Source	Date	Type	Description
Maps	Chief Directorate: National Geo-Spatial Information	Various	Spatial	Historical and current 1:50 000 topographic maps of the study area and immediate surrounds
Aerial photographs	Chief Directorate: National Geo-Spatial Information	Various	Spatial	Historical aerial photography of the study area and immediate surrounds
Aerial photographs	Google Earth	Various	Spatial	Recent and historical aerial photography of the study area and immediate surrounds
Cadastral data	Chief Directorate: National Geo-Spatial Information	Various	Survey diagrams	Historical and current survey diagrams, property survey and registration dates
Background data	South African Heritage Resources Information System (SAHRIS)	Various	Reports	Previous impact assessments for any developments in the vicinity of the study area
Palaeontological sensitivity	South African Heritage Resources Information System (SAHRIS)	Current	Spatial	Map showing palaeontological sensitivity and required actions based on the sensitivity.
Background data	Books, journals, websites	Various	Books, journals, websites	Historical and current literature describing the study area and any relevant aspects of cultural heritage.

3.2. Field survey

The site was subjected to a foot survey on 21, 22, 24 and 25 April 2022. This was during autumn and after good summer rains the grass was quite dense which meant that visibility of the ground and archaeological resources was very poor. Other heritage resources are not affected by seasonality. During the survey the positions of finds and survey tracks were recorded on a hand-held Garmin Global Positioning System (GPS) receiver set to the WGS84 datum (Figure 4). Photographs were taken at times in order to capture representative samples of both the affected heritage and the landscape setting of the proposed development.

ASHA was requested to consider the entirety of the eight properties identified for the Kudu solar projects with a view to informing the final layouts. As such, the survey ranged widely across the study area but, due to an extremely low incidence of finds in the open grasslands, these areas were covered only very sparsely. More emphasis was placed on parts of the study area most likely to be sensitive (e.g. hills, rocky outcrops and areas close to farmsteads).

It should be noted that the amount of time between the dates of the field inspection and final report do not materially affect the outcome of the report.

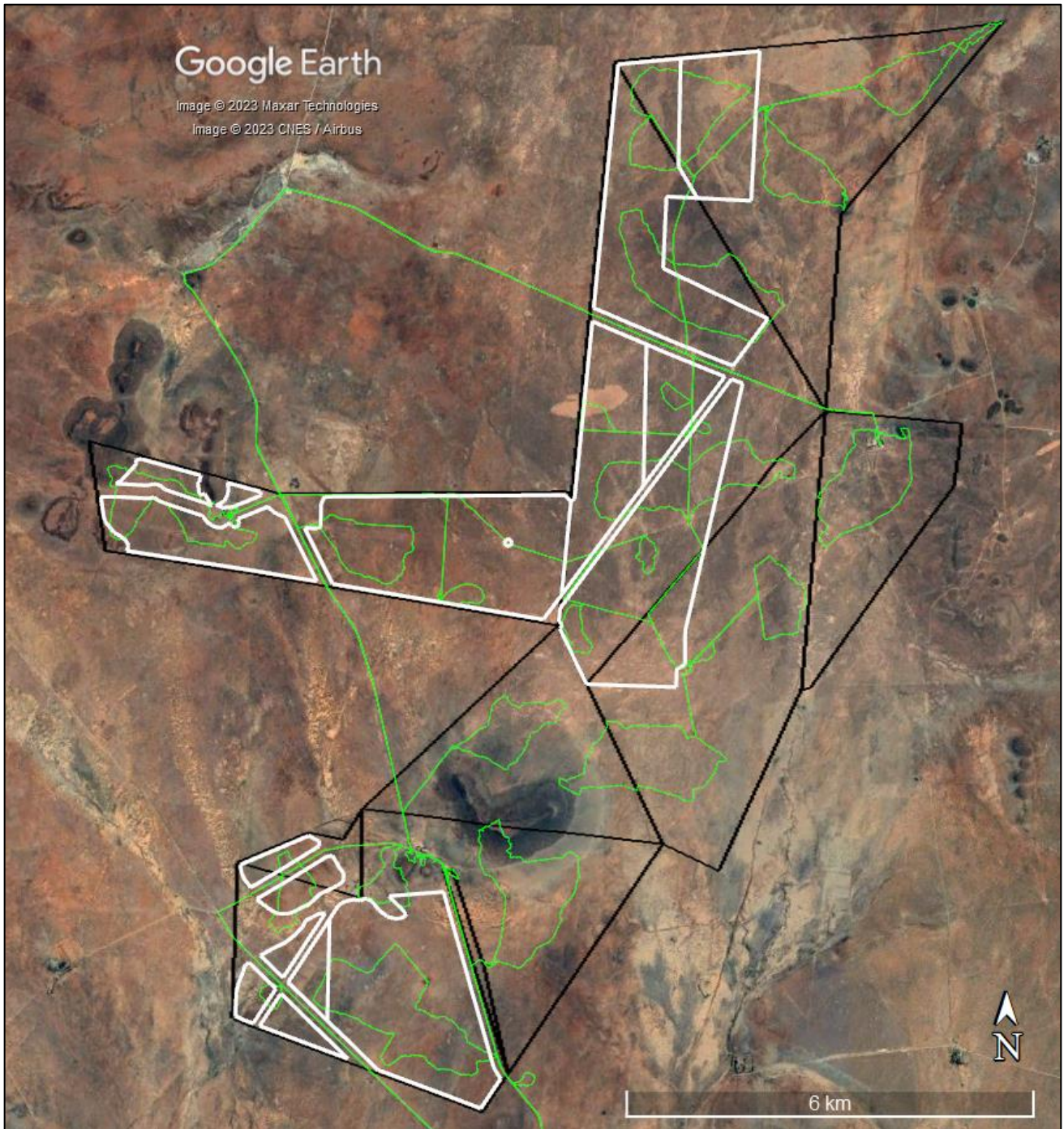


Figure 4: Map showing the survey tracks (green lines) across the wider study area. The farm portions are in black and the PV footprints are in white.

3.3. Specialist studies

A separate palaeontological specialist study was compiled.

3.4. Impact assessment

For consistency among specialist studies, the impact assessment was conducted through application of a scale supplied by the CSIR. Please see the EIA report for details.

3.5. Grading

Section 7 of the NHRA provides for the grading of heritage resources into those of National (Grade 1), Provincial (Grade 2) and Local (Grade 3) significance. Grading is intended to allow for the identification of the appropriate level of management for any given heritage resource. Grade 1 and 2 resources are intended to be managed by the national and provincial heritage resources authorities, while Grade 3 resources would be managed by the relevant local planning authority. These bodies are responsible for grading, but anyone may make recommendations for grading.

It is intended under S.7(2) that the various provincial authorities formulate a system for the further detailed grading of heritage resources of local significance but this is generally yet to happen. SAHRA (2007) has formulated its own system² for use in provinces where it has commenting authority. In this system sites of high local significance are given Grade IIIA (with the implication that the site should be preserved in its entirety) and Grade IIIB (with the implication that part of the site could be mitigated and part preserved as appropriate) while sites of lesser significance are referred to as having 'General Protection' (GP) and rated as GP A (high/medium significance, requires mitigation), GP B (medium significance, requires recording) or GP C (low significance, requires no further action).

3.6. Assumptions, knowledge gaps and limitations

The study is carried out at the surface only and hence any completely buried archaeological sites will not be readily located. Similarly, it is not always possible to determine the depth of archaeological material visible at the surface. On site the grass was dense which meant that ground visibility was very limited. From experience, significant resources in this type of environment tend to be spatially related to dolerite outcrops and these were generally easily located and surveyed. Surveys of the grasslands were very minimal because of both the very low visibility and the expected very low likelihood of finding significant heritage resources there. Nonetheless, transects were walked through these grassy areas to confirm the expectations. Despite the relatively low survey coverage, the expected distribution patterns are assumed to hold true.

Cumulative impacts are difficult to assess due to the variable site conditions that would have been experienced in different areas and in different seasons. Survey quality is thus likely to be variable. As such, some assumptions need to be made in terms of what and how much heritage might be impacted by other developments in the broader area. It is also notable that most of the projects shown in the cumulative impacts map (see Section 7.4) do not appear on the South African Heritage Resources Information System (SAHRIS).

² The system is intended for use on archaeological and palaeontological sites only.

3.7. Consultation processes undertaken

The NHRA requires consultation as part of an HIA but, since the present study falls within the context of an EIA which includes a public participation process (PPP), no dedicated consultation was undertaken as part of the HIA. Interested and affected parties would have the opportunity to provide comment on the heritage aspects of the project during the PPP.

4. PHYSICAL ENVIRONMENTAL CONTEXT

4.1. Site context

The broader Kudu study area is very remote and lies far from any towns. Philipstown is the nearest and lies some 27 km to the southeast. Petrusville is some 33 km east-northeast and De Aar is 57 km to the southwest. The area is used for livestock grazing. Access is all on gravel roads and the only other infrastructure present aside from farming-related features are several high voltage (HV) powerlines. One of these passes through the middle of the Kudu study area (Figure 5). The study area does not fall within a Renewable Energy Development Zone (REDZ; the nearest is Kimberley REDZ 130 km to the northeast) but is entirely contained within the Central Electricity Grid infrastructure (EGI) Corridor.



Figure 5: Map showing the project location in relation to existing HV powerlines (green lines).

4.2. Site description

The wider study area is a flat grassy plain with a number of dolerite hills protruding from it. The PV facilities are proposed on the flat grassland areas. The largest hill is Basberg which lies in the southern part of the study area and affords excellent views over the grasslands to the north and south (Figures 6 and 7). Another prominent but very much smaller hill, *Kaaimanskop*, lies in the north and offers views over that part of the study area (Figure 8).



Figure 6: Panoramic view towards the south from the summit of Basberg showing the general character of the landscape.



Figure 7: Panoramic view towards the north from the summit of Basberg showing the general character of the landscape.



Figure 8: View towards the southwest from the summit of Kaaimanskop showing the character of the flat grasslands in the wider study area.

The Kudu PV3 facility study area is flat, open grassland and lacks any features. The nearest dolerite hill is just over 1.2 km to the northeast. Figure 9 shows a view across part of the PV3 area but taken from just outside the footprint in an area excluded from development.



Figure 9: View towards the south over the western part of the PV3 footprint but taken from outside the site.

5. FINDINGS OF THE HERITAGE STUDY

This section describes the heritage resources recorded in the study area during the course of the project.

5.1. Palaeontology

The SAHRIS Palaeosensitivity Map shows the site to be of largely high palaeontological sensitivity but with small areas of moderate and zero sensitivity (Figure 10). The latter are the dolerite outcrops. Because of this high sensitivity, a palaeontological survey was carried out. The survey found that in fact the areas marked high sensitivity on the SAHRIS map are better considered low sensitivity in practice. Further details are contained in the relevant specialist report.

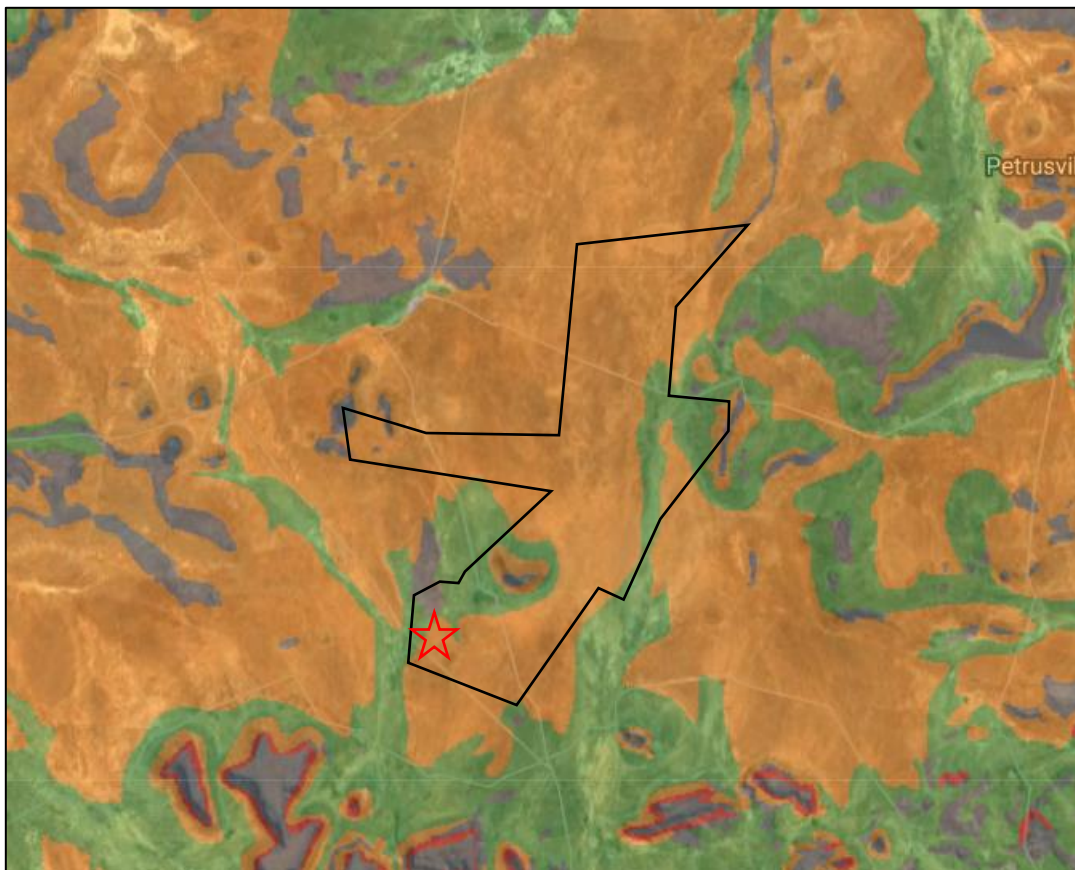


Figure 10: Extract from the SAHRIS Palaeosensitivity Map showing the wider study area to be of largely high sensitivity (orange shading). PV3 lies exclusively over sediments of moderate and high sensitivity (red star).

5.2. Archaeology

5.2.1. Desktop study

The Karoo has a long pre-colonial history as testified by the many thousands of stone artefacts that can be found among surface gravels in many areas. These date to the Early (ESA), Middle (MSA) and Late Stone Ages (LSA) but the former tend to be the least common and do not appear to be on record in the relatively well-studied De Aar area. Pleistocene-aged MSA artefacts occur quite widely and are usually exposed in areas where there is erosion or deflation of the surface. These artefacts are identifiable as MSA by the fact that they are weathered and heavily patinated from very long term exposure and appear orange in colour with their edges rounded off. Much less patinated artefacts are younger with the least patinated or often entirely unpatinated ones being from the Holocene LSA. Heavily patinated artefacts were reported by Van Vollenhoven (2013) to the east of the study area, although he considered them to be from the LSA.

Most other work in the wider area has been close to De Aar and has revealed a variety of Stone Age materials. Because they are generally far better preserved, LSA sites are usually the most significant. Most impressive was a very dense LSA site on a low hill just to the northeast of the town (Orton 2022a). This site had many thousands of stone artefacts as well as pottery and contact period metal items. Other LSA sites in the area tend mostly to be focused on the dolerite outcrops and include ephemeral stone-walled features (Orton 2012; Orton & Webley 2013a, 2013b). However, LSA materials have also been recorded along the Brak River (Orton 2022b). MSA artefacts as noted above have also been widely documented around De Aar (Morris 2011; Kruger 2012; Orton 2012).

One of the most significant aspects of Karoo archaeology is the presence of many prehistoric stone kraals. Most notably, the Seacow River valley to the south of the present study area has revealed many such kraals (Sampson 1984, 1985, 1986, 2010) and enabled a kraal typology to be constructed (Hart 1989). The kraals are typically constructed on sloping ground against dolerite ridges and overlooking water sources. Domestic debris and stone artefacts are seldom associated with them, but when they are, they are taken to represent either the pastoralists camping alongside their kraals or else later re-occupation of the kraals by hunter-gatherer people (Sampson 1985). Although pottery is often taken to signify pastoralist occupation, Sampson (2010) and others (Bollong *et al.* 1993, 1997; Rudner 1979) have shown that in the interior some pottery is tempered with fibre and was made by Bushmen hunter-gatherers rather than Khoekhoe pastoralists.

Rock engravings occur widely, but in highly variable density, on the dolerite outcrops of the Karoo. Rock paintings are also said to be known from the area (De Aar, n.d.) but further details are unknown. Orton & Webley (2013a) found a rock gong that also had a faint fine-line animal engraving on it, while some 40 km south of the Kudu study area Webley and Orton (2011) reported some rock engravings. Some historical engravings (names, initials and dates) are also sometimes found engraved on the rocks (Orton 2012; Webley & Orton 2011). Parkington *et al.* (2008) show an early 20th century map of engravings known at that time (Figure 11). While they do not provide a modern equivalent, this map does give an indication that the main distribution of engravings is to the north of the present study area in the eastern part of Northern Cape and western part of Free State.

Historical archaeological materials in the Karoo are most often associated with farmsteads, either standing, ruined or demolished (e.g. Orton 2012). These materials are often collected in a domestic

dump and include items such as glass, ceramics, bones, ash and rubble. Ruined farm buildings include houses, kraals and various outbuildings. Isolated artefacts or small clusters – such as where a bottle was dropped and broke – are also regularly found in isolation but are not significant.

The Anglo-Boer War was a significant event in Karoo history and will be discussed below. However, it is noted here that artefacts and ruined/disused structures related to the war are also frequently found. Alongside the Brak River at De Aar, for example, was an extensive, but low-density scatter of historical materials that may well represent an Anglo-Boer War camp. Another ephemeral scatter of such material was found by Orton (2021) on a very low hill to the north of and overlooking De Aar. On excavation, this site turned out to have almost all glass and metal artefacts and was very likely a small lookout post (Orton 2022). Small stone-walled features and sometimes larger forts related to the war can also be found but none are known from the area by the present author. No major Anglo-Boer War battles occurred within 70 km of the Kudu study area.





Figure 11: Map compile by Maria Wilman in the early 20th century showing the locations of known rock engravings. Source: Parkington et al. (2008: 33).




5.2.2. Site visit




Table 4 provides a full list of heritage resources recorded across the wider Kudu study area during the survey. They are mapped in Appendix 3. The full list is useful because of the extreme paucity of significant heritage in the PV3 footprint. Reporting only materials from that PV site would suggest there to be very little heritage present on the landscape. However, it was evident that significant heritage resources were associated with nearby dolerite hills and outcrops. These include historical materials related to farming and the Anglo-Boer War as well as both Stone Age and historical engravings. One site had Stone Age engravings on a rock gong. Because the facility layout was designed to avoid sensitive features (and all rocky outcrops), none occur within or close to the proposed footprint and impacts to them are not expected.

It is clear from the observations of weathered and patinated artefacts in areas where the soil is exposed that such finds will be present as background scatter artefacts throughout the study area but likely in variable densities. This includes within the PV3 site and in fact such artefacts were found in two places immediately to the northwest of the footprint. These artefacts relate to many millennia of occupation of the landscape through the MSA and LSA and, because their distribution is conditioned more by natural factors such as erosion, these artefacts are not connected with specific, spatially definable occupation sites. All other traces of occupation have long since disappeared and these artefacts have very low cultural significance. They are therefore of no further concern.




Table 4: List of finds made during the survey. Note that all finds from the wider study area are provided for context but none were found within or close to the PV3 study area.

Waypoint	Location	Description		Significance Grade
947	S30 11 13.0 E24 23 45.3	Farm complex on Wolwe Kuilen 42/rem. The house is early 20 th century and it is in good condition (including inside). There are various outbuildings. The main house is surrounded by trees.		High
948	S30 09 40.1 E24 21 50.3	Gum trees, wind pump and reservoir – part of the cultural landscape		Low


<p>949</p>	<p>S30 08 21.5 E24 22 20.5</p>	<p>Light scatter of well-patinated hornfels MSA flakes and blades and also one less patinated core located in an eroded area.</p> 		<p>Very low GPC</p>
<p>950</p>	<p>S30 09 01.2 E24 21 30.2</p>	<p>Light scatter of well-patinated hornfels MSA flakes located in an eroded area.</p>		<p>Very low GPC</p>



<p>951</p>	<p>S30 08 34.6 E24 22 39.0</p>	<p>Line of gum trees, a wind pump, an old stone-lined low reservoir (derelict), a square plastered and white-washed reservoir and a newer corrugated iron and cement reservoir – heritage resources forming part of the cultural landscape.</p> 		<p>Low</p>
<p>952</p>	<p>S30 08 22.9 E24 23 33.5</p>	<p>A cluster of gum trees with a corrugated iron reservoir under them – part of the cultural landscape.</p>		<p>Low</p>

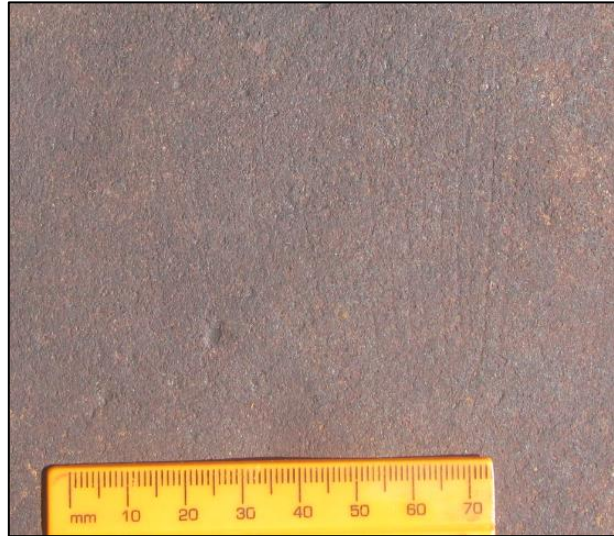


<p>953</p>	<p>S30 08 03.5 E24 24 26.0</p>	<p>A small circular feature made of dolerite rocks and about 1.5 m in diameter. Very close by is a small cairn of dolerite rocks. Both are very overgrown with grass. Also seen here were a few fragments of dark bottle glass, the neck of a small cobalt blue bottle, two fragments of red-painted refined white earthenware and some wire. The site is presumably related to farming activity.</p> 		<p>Medium GPA</p>
<p>954</p>	<p>S30 08 06.6 E24 24 32.1</p>	<p>A circular stone-walled feature of dolerite rocks and located on a low dolerite hill. The feature is about 2 m in diameter. It lies very close to the kraal at waypoint 955 (visible in the background).</p>		<p>Medium GPA</p>


955	S30 08 07.1 E24 24 31.9	<p>A rectangular stone-walled measuring about 9 m by 20 m. It is heavily overgrown with grass. It is very close to the circular feature at waypoint 954.</p> 		Medium GPA
956	S30 08 07.3 E24 24 31.7	A dolerite rock with a scratched motif on it.		Low GPB
957	S30 07 54.5 E24 24 50.2			High

<p>957B</p>	<p>S30 07 53.8 E24 24 46.2</p>	<p>These two points lie along the southern end of an approximately 5 km long dolerite stone wall that extends northwards along a dolerite dyke on Farm 209 ending at waypoint 959 on the farm to the north (outside the study area). The wall has been broken down to erect the current farm fence.</p>		<p>IIIB</p>
<p>958</p>	<p>S30 07 53.8 E24 24 51.8</p>	<p>A lightly scraped geometric engraving. It is almost certainly not part of the geometric tradition rock art but looks quite recent.</p>		<p>Medium GPA</p>




959	S30 07 53.1 E24 24 52.6	This point is at the northern end of the wall recorded under waypoint 957.		High IIIB
960	S30 07 53.3 E24 24 52.0	A dolerite rock with some scratches on it.		Very low GPC




961	S30 07 53.4 E24 24 51.9	<p>Two historical scratched horse engravings and a few other images. The horses are identical in design, but the one is far smaller (and clearer) than the other. The large one is above the scale in the photograph below, while the smaller is indicated by the yellow arrowed. There is also a patch of multiple parallel lines that is very well patinated and must be far older (red arrow).</p> 		Medium IIIB
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962	S30 08 23.9 E24 24 12.8	An isolated dolerite rock that looks like it has been used as a lower grindstone. The surface is lightly concave which presumably invited this use.		Very low GPC
963	S30 09 03.6 E24 23 16.6	Light scatter of well-patinated hornfels MSA flakes located in an eroded area.		Very low GPC
964A	S30 09 14.1 E24 23 25.6			Medium



964B	S30 09 14.9 E24 23 25.6	<p>These waypoints are the four corners of a U-shaped kraal located on the northern foot of a prominent hill. The open side of the kraal faces downhill and the entire structure is 33 m by 33 m. It is heavily overgrown with grass.</p>		GPA
964C	S30 09 15.2 E24 23 24.5			
964D	S30 09 14.2 E24 23 24.4			
965	S30 09 16.3 E24 23 25.8			
965B	S30 09 16.1 E24 23 26.5			
965C	S30 09 16.8 E24 23 26.9			
965D	S30 09 17.1 E24 23 26.0			
965E	S30 09 17.8 E24 23 26.4			
965F	S30 09 17.4 E24 23 27.2			




966	S30 09 15.5 E24 23 25.8	<p>There are two stone-walled features here. One is a small, circular feature less than 2 m across (photograph below), while the other has two enclosures with the whole feature being about 5 m across (photographs at right). They are assumed to relate to farming activities and are located just north of the kraal at waypoint 965.</p> 		Medium GPA
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967	S30 09 17.5 E24 23 25.4	Two stone-walled enclosures of about 2 m diameter each.			Medium GPA
968	S30 09 18.2 E24 23 25.0	A small stone cairn with two fragments of dark bottle glass alongside it.			Medium GPA
969	S30 09 18.9 E24 23 25.0	A small stone cairn. Feature apparently related to the ABW.			Medium GPA



970	S30 09 19.6 E24 23 25.1	A small stone cairn. Feature apparently related to the ABW.			Medium GPA
971	S30 09 19.7 E24 23 25.1	An elongated pile of stones. Feature apparently related to the ABW.			Medium GPA
972	S30 09 20.1 E24 23 25.4	A small stone cairn on a flat dolerite outcrop. Feature apparently related to the ABW.			Medium GPA



973	S30 09 20.6 E24 23 25.2	An elongated pile of stones. Feature apparently related to the ABW.			Medium GPA
974	S30 09 21.0 E24 23 25.2	An elongated pile of stones. Feature apparently related to the ABW.			Medium GPA



975	S30 09 21.2 E24 23 25.5	A small stone cairn. Feature apparently related to the ABW.		Medium GPA
976	S30 09 21.2 E24 23 25.1	A small stone cairn. Feature apparently related to the ABW.		Medium GPA

977	S30 09 21.7 E24 23 25.1	A small stone cairn. Feature apparently related to the ABW.			Medium GPA
978	S30 09 19.1 E24 23 15.0	The overgrown and much degraded remains of an earthen walled dam with a few stones present on the ground at 978 and a slight earth mound present at 978B and 978C. The earth mound has no doubt eroded flat.			Very low GPC
978B	S30 09 18.5 E24 23 14.2				
978C	S30 09 19.7 E24 23 13.3				
979	S30 09 18.9 E24 23 15.0	Light scatter of moderately well-patinated MSA hornfels flaked stone artefacts.			Very low GPC

980	S30 09 48.7 E24 22 15.6	A row of gum trees with other older trees and a corrugated iron reservoir nearby. Part of the cultural landscape.			Low
981	S30 09 45.7 E24 22 17.3	Ephemeral scatter of well-patinated hornfels MSA flakes located in an eroded area.			Very low GPC
982	S30 11 08.7 E24 21 35.8	Some trees and a reservoir. Part of the cultural landscape.			Low
983	S30 11 22.8 E24 18 16.7	A large farm outbuilding and two ruined labourers' cottages that are likely more than 60 years old. They are on Portion 5 of Grass Pan 40, outside the study area. There is also one more recent cottage. These are on a neighbouring farm and were not visited.			Medium




984	S30 11 09.9 E24 23 47.8	Light scatter of well-patinated hornfels MSA flakes as well as a few less patinated ones and some quite fresh ones. The latter are LSA. The artefacts are located in an eroded area with plenty of hornfels gravel at the foot of a dolerite hill.		Very low GPC
985	S30 11 10.5 E24 23 53.6	The poorly preserved remains of a stone-walled kraal measuring about 18 m by 37 m and located on the foot of a dolerite hill. Although the site was not examined in detail, some glass, ceramics and metal fragments were seen.		Low GPB



986	S30 11 11.3 E24 23 55.5	<p>This is the foundation of a small (presumably) house made of dolerite rocks but with a brick and cement portion built on to the southern side. It is located very closer to the kraal at waypoint 985. Although the site was not examined in detail, some glass, ceramics and metal fragments were seen.</p>			Medium GPA
987	S30 11 08.2 E24 23 56.3	<p>A scraped engraving on top of a dolerite hill. It looks quite recent and relatively casually done. It might be lettering but it is not possible to be sure of this.</p>			Very low GPC




988	S30 11 07.5 E24 23 55.9	A circular enclosure of about 3.5 m by 2.5 m located on the summit of a dolerite hill. It is just a low wall of informally piled stones. No associated artefacts seen so cannot tell if this is historical or precolonial.			Low GPB
989	S30 11 07.2 E24 23 55.8	A circular enclosure of about 1 m diameter located on the summit of a dolerite hill. It looks like informally piled stones but could also be badly tumbled. The walling is far more substantial than that at waypoint 988 No associated artefacts seen so cannot tell if this is historical or precolonial.			Low GPB
990	S30 11 10.1 E24 24 00.2	Ephemeral scatter of well-patinated hornfels MSA flakes as well as some quite fresh ones. The latter are LSA. The artefacts are located in an eroded area with plenty of hornfels gravel at the foot of a dolerite hill.			Very low GPC
991	S30 12 03.3 E24 23 13.1	Some gum trees and a reservoir. Part of the cultural landscape.			Low



992	S30 11 15.1 E24 23 30.6	A rectangular earthen feature measuring 18 m by 24 m. It is barely visible on the ground but is clear on aerial photography. It may have been a low dam but there are no stones on the walls and no wind pump nearby.		Very low GPC
993	S30 11 10.7 E24 23 30.0	This is a scatter of patinated MSA hornfels artefacts in a disturbed area. There are heavily patinated and somewhat less patinated artefacts indicating that not all come from the same time.		Very low GPC
994	S30 11 20.6 E24 21 49.2	An ephemeral scatter of well-patinated MSA hornfels artefacts located in the jeep track below powerlines.		Very low GPC
995	S30 11 48.6 E24 21 23.7	An ephemeral scatter of well-patinated MSA hornfels artefacts located in the jeep track below powerlines.		Very low GPC


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996	S30 11 49.9 E24 21 59.1	Some gum and Karee trees and a reservoir. Part of the cultural landscape.		Low
997	S30 11 47.4 E24 22 01.2	An ephemeral scatter of well-patinated MSA hornfels artefacts located in a denuded area.		Very low GPC
998	S30 11 29.7 E24 22 52.1	This is an area with windrows as well as a fruit orchard (quince, prickly pear and probably peach trees) as well as a grove of Soutbos. There is a stone-lined dam (marked as waypoint 999) and some wind pumps and a corrugated iron reservoir. Part of the cultural landscape.		Low
999	S30 11 28.2 E24 22 50.6	This is the stone-lined dam noted under waypoint 998.		
1000	S30 11 18.4 E24 22 07.5	Ephemeral scatter of well-patinated hornfels MSA flakes located in an eroded area.		Very low GPC
1001	S30 13 01.1 E24 21 55.9	Some trees, a corrugated iron reservoir and a wind pump. Part of the cultural landscape.		Low
1002	S30 13 32.8 E24 22 02.6	Some trees and a reservoir. Part of the cultural landscape.		Low

1003	S30 13 55.1 E24 21 30.5	An old prickly pear orchard located very far from any farm buildings. Part of the cultural landscape.		Low
1004	S30 13 52.7 E24 20 48.4	A light scatter of fresh hornfels flaked stone artefacts and some ostrich eggshell fragments at the northern foot of a dolerite hill (Basberg). It cannot be determined how extensive the scatter is due to the dense grass but it might stretch much further than was evident. These finds were in a pathway.		Low GPB
1005	S30 12 01.4 E24 20 19.0	Some trees, a corrugated iron reservoir and a wind pump. Part of the cultural landscape.		Low
1006	S30 11 53.4 E24 19 44.3	A cluster of gum trees. Part of the cultural landscape.		Low
1007	S30 11 33.2 E24 18 22.3	A farmstead on Portion 5 of Grass Pan 40, outside the study area. It was not visited. The house looks to be early 20 th century.		High

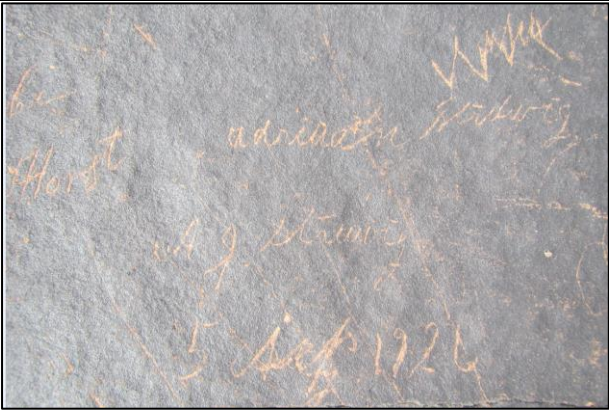
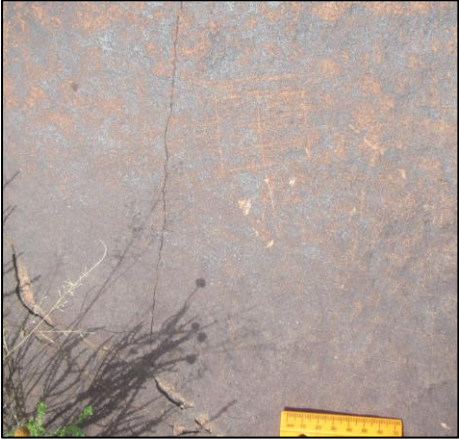

1008	S30 14 30.9 E24 19 35.9	The oldest-looking of a set of three different labourers' cottages. It is in poor condition and is probably early-mid-20 th century.			Low
1009	S30 17 32.6 E24 20 50.6	Mixed age hornfels artefacts exposed along the edge of a borrow pit. Some artefacts were seen to have some calcrete adhering and the patination varied from well-patinated red to only lightly patinated grey.			Very low GPC
1010	S30 16 13.1 E24 19 54.9	Ephemeral scatter of well-patinated hornfels MSA flakes located in an eroded area.			Very low GPC
1011	S30 16 10.6 E24 19 41.7	Ephemeral scatter of well-patinated hornfels MSA flakes located in an eroded area.			Very low GPC
1012	S30 16 15.8 E24 19 04.5	Some gum trees, a corrugated iron reservoir and a wind pump. Part of the cultural landscape.			Low


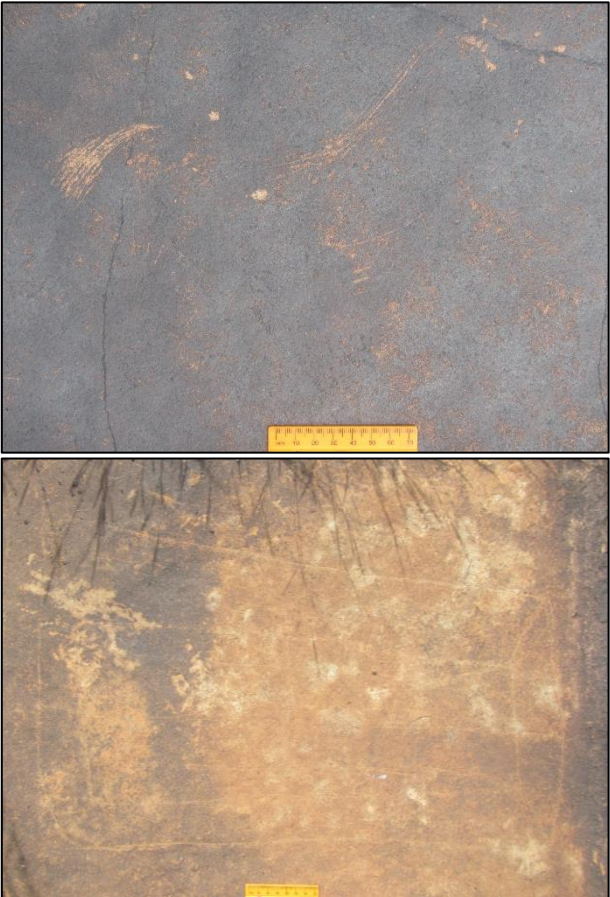
1013	S30 15 28.9 E24 19 35.7	Some trees, a corrugated iron reservoir and a wind pump. Part of the cultural landscape.			Low
1014	S30 15 21.0 E24 20 07.6	A large willow tree, a corrugated iron reservoir and a wind pump. Part of the cultural landscape.			Low
1015	S30 14 35.8 E24 19 46.5	An earthen-walled dam with a few stones along its crest at one point.			Very low



<p>1016</p>	<p>S30 14 36.0 E24 19 49.5</p>	<p>An area of 25 m diameter on a low dolerite hill with many historical/recent engravings. They include indistinguishable scratches and motifs, horses, ostriches and writing. One rock has the date "5 Sep 1926" and the name "Jacobus Grabe (likely) Badenhorst" in cursive writing. It also has "E. ROBINSON" and a large stylised ostrich scratched on it. Another rock has two ostriches, one with a shaded body, while two others have stylised horses scratched on them. The site has been allocated a grade despite the date of 1926, since it is easily possible that the engravings were made over a long period of time and some may be older than 100 years. Either way, the site demonstrates a connection with intangible heritage through its continuation of the engraving tradition. The same applies to all the rock engravings recorded below.</p>		<p>Medium-High IIIB</p>
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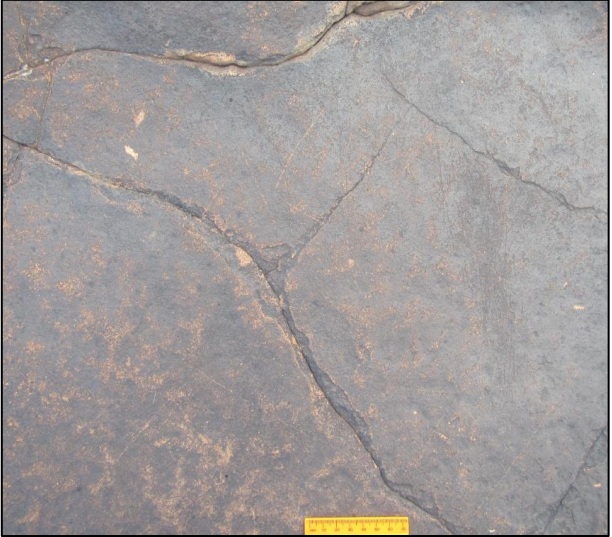




				
1017	S30 14 37.1 E24 19 50.9	<p>This is another area on the same low hill as waypoint 1016 but it is about 10 m in diameter. It includes a checkered motif made in a cross shape with some squares having an X in them, along with several other geometric and indeterminate scratched motifs.</p> 		Medium GPA

1018	S30 14 38.1 E24 19 51.3	<p>This is another area on the same low hill as waypoint 1016 but it is about 5 m in diameter. The engravings here include a stylised horse which is somewhat patinated and could be older than the rest, a geometric motif similar to a Nine Men's Morris board, a set of three columns of 8, 9 and 10 short lines respectively, and some indeterminate scratches/motifs.</p> 		Medium-High IIIB
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1019	S30 14 38.8 E24 19 51.5	Further along the same hill as waypoint 1016, a very lightly scratched stylised horse with several other indeterminate very light scratches over and around it.			Medium GPA
1020	S30 14 39.8 E24 19 52.7	Further along the same hill as waypoint 1016, an indeterminate scratched geometric motif.			Low GPB

<p>1021</p>	<p>S30 14 40.3 E24 19 52.7</p>	<p>Further along the same hill as waypoint 1016, an indeterminate scratched motif.</p>		<p>Low GPB</p>
<p>1022</p>	<p>S30 14 38.7 E24 19 48.9</p>	<p>Various scratched rocks with one image being an animal with the top of its body drawn far higher than it should be.</p> 		<p>Low GPB</p>

1023	S30 14 27.5 E24 19 26.2	<p>The Basberg farm complex has an assortment of structures of varying age. The main house is in very good condition and looks to be early-mid-20th century. A large barn made from clay bricks is probably a little older, as is a very small structure with two doors and an internal hearth. Right outside it is a pole with several hooks on it (possibly for hanging hunted animals). A werf wall of dolerite cobbles runs round the back of the main house.</p>	 The top photograph shows a single-story main house with a prominent red roof and a chimney. The house is partially obscured by a well-maintained green hedge. In the foreground, there is a field of tall, dry, yellowish-brown grass. The bottom photograph shows a long, white-painted barn with a gabled roof. The barn has two large, yellow-painted wooden doors. The ground in front of the barn is dark and appears to be gravel or dirt.	Medium-High
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1024	S30 14 27.7 E24 19 24.4			