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**2019-11-25**

Reference: **APAC019/121**

To: **Me. M. Badenhorst**  
ACED for:

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**RE: FINAL REPORT ON THE MONITORING OF PROTECTED ARCHAEOLOGICAL SITES RELATED TO THE CHMP IMPLEMENTATION FOR THE PROPOSED 75MW ZEERUST PHOTOVOLTAIC SOLAR FACILITY ON PORTIONS OF THE FARMS KAMEELDOORN 271JP & KRUISRIVIER 270JP, INCLUDING THE NEW ALTERNATIVE EXPANSION AREAS, ZEERUST, NORTHWEST PROVINCE**

This document represents a Final Report on the Monitoring of archaeological sites that are located within the area of the Zeerust Solar PV Plant development near Zeerust, Northwest Province. These sites were identified and recorded during a number of Heritage Impact Assessments by the author of this document, and were included in a Cultural Heritage Management Plan drafted by the author. As part of the recommendations in the CHMP the fencing-in of the identified sites to protect them against negative impacts by the development were also proposed. This was agreed upon and also included in SAHRA's (The South African Heritage Resources Agency's) Final Comments Document (October 2016 – **Case ID #9194**). A permit for the Site Fencing was applied for from and issued by SAHRA in March 2018 (**Case ID #12221 & Permit ID #2708**). A requirement of the permit was the submission of a Final Report to SAHRA by the end of March 2019 (which was done subsequently in January 2019).

Part of the appointment of APAC cc related to the CHMP Implementation was that a number of Monitoring Visits had to be undertaken during the Construction Phase of the Development. Site clearing (as part of the construction/development work) commenced after January 2019. This work also included the demarcation of the agreed upon 30m Buffer Zones around identified & fenced-in archaeological sites. During the pre-construction work and during a visit by the DEA to the development, a few previously unknown stone-walled features were identified by the contractors on site and they duly requested APAC cc to undertake a site inspection to determine the significance of these and to recommend on the way forward.

**AJ Pelsers BA (UNISA), BA (Hons) (Archaeology) [WITS], MA (Archaeology) [WITS]**

The subsequent report discussed the results of this 1<sup>st</sup> Monitoring Site Visit undertaken in conjunction with Mr. Derek Willemsse of COBRA on the 17<sup>th</sup> of April 2019 (**See 1<sup>st</sup> Monitoring Report APAC019/37**).

After the April 2019 site visit, extensive site/area clearance was undertaken and the development of the PV Plant area started in earnest. The fencing around the development area was completed. The 23<sup>rd</sup> of July site visit was the 2<sup>nd</sup> of the Monitoring Site Visits, and aimed at visiting the archaeological sites that have been fenced-in and protected as part of the CHMP Program Implementation, as well as to check on these sites and to see if any other heritage features and material might have been exposed by the site clearance work done so far. The results of this Site Visit, as well as recommendations on the way forward were presented in a 2<sup>nd</sup> Monitoring Site Visit Report (**See Report APAC019/76**).

The third Monitoring Site Visit was undertaken on the 3<sup>rd</sup> of October 2019 (**See Report APAC019/98**), with the aim being to assess the conditions of the fenced-in archaeological sites, to determine if the various recommendations made in the 2<sup>nd</sup> Report were implemented and to determine if there are other issues related to the Solar PV Plant's on-going development and construction that might impact on the heritage sites at the development.

## **BACKGROUND**

APelser Archaeological Consulting (APAC) was initially appointed by RE Capital 2 (Pty) Ltd to conduct a Heritage Impact Assessment (HIA) for the grid connection for the proposed development of a 75MW Photovoltaic Solar Facility near Zeerust in the Northwest Province (**See Report APAC01547b – October 2015**). A 2012 study by the same author (**See Report AE01244P – July 2012**) on Kameeldoorn 271 identified a number of Late Iron Age stone walled sites and finds. As a result of this a number of other alternative sites for the development were earmarked and a 2013 study had to focus on these 3 Alternatives, as well as the original study area (**See Report APAC013/64 – October 2013**). In March 2016 APAC was again contracted to look at an Expansion Area for the Plant. The need for this study was driven by the fact that in order to achieve the required generation capacity of the facility, the developers needed to expand the area under panel by a total expansion of less than 20 ha (**See Report APAC016/18 – April 2016**).

A number of archaeological and recent historical sites and finds were identified in the study areas during the earlier assessments, and recommendations on their mitigation were provided in these documents. As part of this a Cultural Heritage Management Plan for the Zeerust Solar Plant development was commissioned by the developer (**APAC016/24**). The South African Heritage Resources Agency (SAHRA) provided comments (Case ID: 9194 – Interim Comments June & August 2016 & Final Comments October 2016) on this document, and an Amended Version of the CHMP (**See APAC016/44**, dated September 2016) was the result of these comments and the requirements contained in it.

Although a number of archaeological and historical sites were recorded during the various assessments, only those that fell within and close to the final footprint area of the Solar Plant were included in the Cultural Heritage Management Plan for the development.

A number of Late Iron Age stone walled sites and features were identified during the various assessments in the area. The sites are located mostly around rocky outcrops and close to the existing Water Reservoir in the area, and fairly close to the preferred and Alternative Substation locations. The sites probably formed part of a larger LIA settlement complex, representing individual settlement units or homesteads with features such as cattle kraals (livestock enclosures), hut bays and other related features. It possibly dates to the same time period as the Hurutshe settlement complexes at Kaditshwene and other sites close to Zeerust, and around the late 18th to early 19th century. Very little cultural material was observed, and only fragments of undecorated pottery were identified during the field assessment.

Sites 12 & 13 as well as Sites A & B (as identified and described in the above-referenced study reports and CHMP) are Late Iron Age (LIA) stone-walled settlement remains. These sites are most likely related to a single settlement complex in the area.

Based on the initial assessments and findings it was concluded that Sites A, B, 12, 13 & 14/15 would be directly impacted on by the proposed development activities and it was recommended that they be fenced-in to protect and manage them as indicated in the CHMP. SAHRA's permit issued for the fencing indicated that Sites A, B, 12, 13 & 14 should be fenced-in, but excluded Site 15. Based on a Final Layout Plan for the PV Plant it was initially indicated that Sites A, 12, 13 and B will be directly impacted on by the proposed development, while Sites 14 & 15 is situated in fairly close proximity to the boundary of the footprint area.

The following was originally recommended:

- Sites A, B, 12 & 13:** No development should be allowed closer than 30m (buffer zone) around these Stone-walled settlement sites and they should be properly fenced in with a wooden pole fence to protect them. If they cannot be avoided and need to be demolished then the sites will have to be mapped & archaeologically investigated in detail under an archaeological excavation permit prior to a demolition permit being applied for.
- Site 14:** Very little of the structure remains, and its significance as a result is seriously diminished. No mitigation is needed.
- Site 15:** As the stone cairns located here could possibly be graves, it is best avoided and should in no way be disturbed. No development should be allowed closer than 30m (buffer zone) around the site and it should be properly fenced in to protect. If the site and the stone cairns on it cannot be avoided by the development, then they should be properly investigated to determine if they are graves or not. This would include social consultation with community members and the property owner. If these turn out to be graves they can be exhumed and relocated after all due consultation and legal processes have been concluded satisfactorily. Best practice would be to leave them intact and to fence in the site.

Sites 14 and 15 is however not impacted by the PV Plant development and no fencing was therefore required. With RE Capital's commitment to protect the other archaeological sites (Sites 12, 13, A & B) in situ (through fencing) to avoid any direct and further negative impacts, no other mitigation measures were required. Part of their commitment included the implementation of a Monitoring Program, firstly during the fencing of the sites to ensure that the archaeological sites and cultural material are not disturbed **and secondly monitoring site visits during the Construction Phase of the Project to ensure that no sites are disturbed or destroyed as a result. Various Site Visit Reports were submitted as part of this process.**



Figure 1: Aerial view showing the development area and the sites recorded (Google Earth 2016).

#### Site Visit prior to Fencing: 10<sup>th</sup> of January 2019

APAC was requested in early January 2019 to undertake a site visit together with Cobra (the on-site Contractor for the PV Plant) in order to do an inspection of the sites that require fencing, as well as to locate the sites that they were unable to find during their initial site inspections. Sites A, 12, 13 and B were visited. The results of this site visit and recommendations on the way forward were the following:

#### Site B – Water Reservoir

1. It was indicated during the visit that this site will not be impacted on by the development any further and has been excluded from the Site Plan. Fencing was therefore no longer required.

#### Site A

1. The site could initially not be traced, but some pieces of pottery at the location indicated by the GPS coordinates were found. Remnants of the stone-walling identified during earlier assessments were located some distance away from here. The stone-walling had been extensively impacted upon since the earlier surveys. **The recommendation was that no fencing was required for Site A anymore.**

#### Site 12

The site was fenced-in as indicated with a boundary fence 5m from its outer perimeter, and a further 25m (to make up the required 30m buffer) buffer zone placed around it.

#### Site 13

During the January 2019 this site could not be located. It is possible that the initial GPS coordinates were faulty and that the actual site is located some distance away from here. It is also possible that subsequent to earlier assessments that the site could be covered by either dense vegetation or soil and is not visible. Earlier images of the site show a low foundation wall at the site.

The site is located in a natural waterway that will not be impacted by the Solar PV Plant development activities. It was recommended that fencing was not required anymore as the site and feature associated with it will be protected.

### **New Site 1**

During the January 2019 site visit a previously unknown stone-walled feature was identified in the area, relatively close to the area where Site 12 is located. It consisted of the low foundation walls of a hut as well as a possible granary stand.

Initial plotting of the site indicated that the site does fall within the boundary of the PV Plant development and that it will be impacted by the placement of solar panels. It was recommended that it be fenced-in similar to Site 12 and this was also subsequently completed.

### **Fencing of Archaeological Sites: January 2019**

The fencing of the identified archaeological sites (Sites 12 and the New Site) was undertaken during the 15<sup>th</sup> of January (**See Final Site Fencing Report APAC019/04**).

There were also some smaller and less visible features located around both sites (low wall foundations & individual grinding stones for example) that did not form part of the core of each site. These were photographically documented but were not fenced in as they fall within the 30m Buffer Zone around each site and will therefore be protected. These areas were to be monitored during the next phase of work (Construction) to ensure that there will be no negative impacts on any significant archaeological features or cultural material.

The required Site Signage material (Site Notices) were also to be erected at both sites at a later stage, as these were still being produced by the contractor at the time. This was done and documented as well during the subsequent Monitoring Site Visits.





**Figure 2: Erecting the fence around Site 12.**



**Figure 3: The fencing around Site 12 nearing completion.**



**Figure 4: A view of the fence around Site 12.**



**Figure 5: Fencing at the New Site in progress.**





**Figure 6: Fencing at the New Site nearing completion.**



**Figure 7: New Site fencing complete.**

#### **1<sup>st</sup> Monitoring Site Visit: 17<sup>th</sup> of April 2019**

Although the erection of a boundary fence around the development area, site clearance work and the commencement of construction work had not yet commenced at the time, a 1<sup>st</sup> Monitoring Visit was necessitated by the discovery of some previously unknown stone-walled features in the area during the erection of the buffer zones around the fenced-in sites, as well as during a visit to the area with representatives of the DEA. These finds were deemed sensitive as they are located within the solar panel areas, and APAC cc was requested to undertake a site visit to determine the significance of and the



impact of the development on them. A report on this visit providing recommendations on the way forward was to be submitted afterwards.

The site visit was undertaken on the 17<sup>th</sup> of April. Although the stone-walling at the site was fairly well preserved, the site only represented a small part of the larger settlement complex in the area. The new site probably formed part of the main settlement around the hill where the Water Reservoir is situated today, as well as the Site 13 and other stone-walled site that has been fenced-in and will be protected and managed within the Zeerust Solar PV Plant. Based on this the site was deemed to be not of high significance and it was recommended that it could be demolished. Better preserved walling is also present within the protected fenced-in sites (**for detailed results of the 1<sup>st</sup> Monitoring Site Visit see Report APAC019/37**).



**Figure 8: Aerial view of location of new site in relation to known and protected sites (Google Earth 2019).**



**Figure 9: A view of the stone-walling at the newly identified site.**



**Figure 10: Another view of the stone-walling here.**

### **2<sup>nd</sup> Monitoring Site Visit: 23<sup>rd</sup> of July 2019**

The 2<sup>nd</sup> site visit was conducted on the 23<sup>rd</sup> of July 2019 and aimed at inspecting the fenced-in Archaeological Sites to monitor their status, as well as to see if any possible previously unknown and invisible cultural features and material had been exposed by the extensive site clearance and

establishment work that has taken place since April 2019. Recommendations on any possible remedial actions were also to be presented in the resultant report.

It was clear from the site visit that the original landscape of the area had been completely altered as a result of the site clearance work. The development area had been fenced-in. The only clusters of original vegetation that still existed were that around the protected archaeological sites and the drainage lines/streams that had been declared no-go zones. The area around the Water Reservoir had also been left intact and is situated on the outside of the development footprint. This resulted in the complete in situ protection of the stone-walled Iron Age sites located there as well.

**In terms of the Fenced-in Archaeological Sites (Sites 12 & 13) the following could be stated:**

1. The sites were in fairly good condition, although some recent bush-clearing and resultant vehicle tracks had impacted on some portions
2. Some dumping of refuse and other material occurred in some sections
3. The Site Signage/Notices erected at these sites were not in a good condition, with some notices torn, completely removed and/or invisible from the outside of the sites

**The following remedial actions were recommended:**

- A. The site signage needed to be replaced by more permanent markers (chromadek) and should be placed on the perimeter of the fenced-in sites, facing outwards so that contractors/workers/visitors can see them clearly.
- B. Refuse removal should be undertaken as a matter of course and contractors/workers need to be encouraged to not litter in or on these heritage sites.
- C. No vehicles should be allowed inside the fenced-in areas in order to avoid damage to the sites and the stone-walled features on them.

It was also evident from the 2<sup>nd</sup> site visit that the archaeological sites were not that rich in terms of cultural material deposits. Very few scatters of material (which are typical of these sites) were visible on the surface of the sites, and only small numbers of objects were seen in the scraped/cleared areas outside of the fenced-in sites. A few fragments of undecorated pottery pieces were found just outside in one or two spots.

During the site visit it was also indicated to the Specialist Team that some tree clearance around the stone-walled sites (from the perimeter to around 5m inwards) would be required to diminish any possible shading from these trees on the Solar Panels that will be located here.

The following was recommended in terms of this:

- i. The trees that were to be removed were to only be trimmed and cut-down, with the stumps left intact and not pulled out in order to prevent any possible disturbance of subsurface archaeological features or material
- ii. All cut and trimmed branches and trunks had to be removed from the site once the work had been completed.

Although some "damage" had been done to the fenced-in archaeological sites since the January fencing and the 1<sup>st</sup> Monitoring Site Visit of April (through refuse dumping, vehicles tracks in sections and some bush removal) in general the sites were well protected. Site Signage issues as indicated had to be dealt with, while refuse removal had to be undertaken as well.





**Figure 11: A view of the Reservoir Area outside of the development footprint.  
The archaeological sites here are protected in situ.**



**Figure 12: A view of a section of the cleared development footprint.**



**Figure 13: Another section of the cleared development area.**



**Figure 14: Another view. The cluster of vegetation visible here denotes the drainage/stream line in the area.**



Figure 15: A section of the fenced-in archaeological sites.



Figure 16: Old work gloves in one of the fenced-in sites.





Figure 17.



Figure 18.



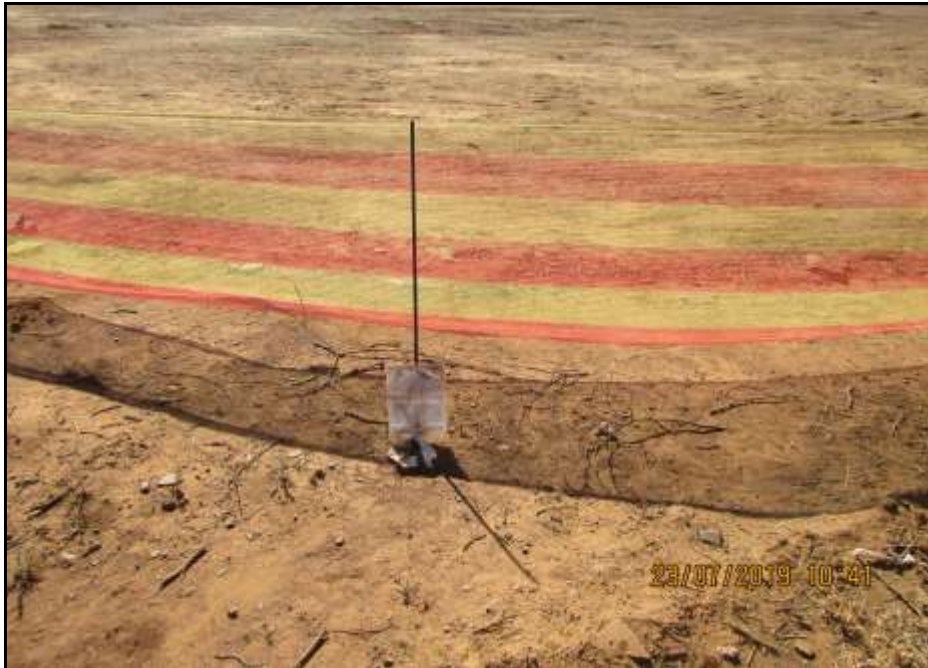


Figure 19.



Figure 20: Some of the Site Notices have been torn.





**Figure 21: Most of the remaining Site Notices were placed on the inside of the sites & was not visible to contractors/workers.**



**Figure 22: Someone used a part of the archaeological site as a toilet.**





**Figure 23: A recent vehicle track in a part of the fenced-in site.**



**Figure 24: Recent bush clearance in a section of the site.**



**Figure 25: Fragments of Iron Age pottery found outside of the fenced-in sites in a cleared area.**

### **3<sup>rd</sup> Monitoring Site Visit: 3<sup>rd</sup> of October 2019**

The 3<sup>rd</sup> visit focused on determining if the various recommended measures put forward in the 2<sup>nd</sup> Monitoring Site Visit Report had been implemented.

Although the Site Signage had been updated since the last visit, only Site Signage in English, Spanish and Afrikaans were visible on site. The Tswana ones (according to a Zeerust Solar PV Plant representative that escorted the team during the visit) were erected but had been removed for some reason. Also, the signs are still non-permanent (paper-based, laminated only). Although this is a relatively cheap option they have to be constantly replaced as the wind and other weather factors (sun) tear and bleach them. It was recommended that the Chromadek-type signs recommended earlier needs to be considered as a permanent solution. It was also deemed of high importance that Site Signage in Tswana had to be erected in the same locations as the English, Spanish and Afrikaans ones.

Refuse removal since the 2<sup>nd</sup> Site Visit had clearly taken place. There were however still some remaining rubbish while some areas with “new” litter were also identified. Refuse removal should be undertaken as a matter of course and contractors/workers needs to be encouraged to not litter in or on these heritage sites.

During the July 2019 site visit the Specialist Team was informed that some tree clearance around the stone-walled sites (from the perimeter to around 5m inwards) would be required to diminish any possible shading from these trees on the Solar Panels that will be located here. The following was recommended in the 3<sup>rd</sup> Report:

- i. The trees must only be trimmed and cut-down, with the stumps left intact and not pulled out in order to prevent any possible disturbance of subsurface archaeological features or material. **Although this was done for the most part there were some that were physically removed (uprooted). The danger in doing this is that sub-surface archaeological material might be exposed and removed as a result.**



- ii. All cut and trimmed branches and trunks had to be removed from the site once the work had been completed.

During the 3<sup>rd</sup> visit the team was also asked to give advice on the development of the Solar Panels that will be close to the fenced-in archaeological sites. The positioning of these panels were fixed a long time ago before the fencing of the sites and the final buffer zone (of 30m) determination. As a result this section of panelling cannot be moved or changed and a small section will encroach into the larger fenced-in area (not the fenced-in archaeological sites). As part of this some further vegetation will have to be removed.

The following recommendations in this regard were given:

1. The trees should be cut down at the stump level and not be uprooted physically to avoid accidental exposure of archaeological deposits
2. All cut down vegetation should be removed from inside of the fenced-in area
3. If possible the work should be done under supervision of the Heritage Specialist to ensure that no archaeological heritage features or material are damaged or exposed



**Figure 26: An estimated view of the impact of the panels onto the fenced-in area. The fenced-in archaeological sites will not be impacted (Google Earth 2019).**





Figure 27: A view of the fenced-in sites in October 2019.



Figure 28: New site signage on the site.



**Figure 29: Trees and vegetation removed and dumped on site. These and others should be removed.**



**Figure 30: Refuse found on the site.**





**Figure 31: More new Site Signage. Only English, Spanish and Afrikaans remained on site.**



**Figure 32: More rubbish on site.**





**Figure 33: A section of fencing around Site 12 that had been broken and needed to be fixed.**



**Figure 34: A view of a section where trees had been cut down the correct way (down to the stump without uprooting).**



**Figure 35: Vegetation removed but left on site. A vehicular track is also visible.  
No vehicles should be allowed on site.**



**Figure 36: The section of vegetation that has to be removed to make way for the Solar Panels**

## **FINAL CONCLUSIONS & RECOMMENDATIONS**

APelser Archaeological Consulting (APAC) was initially appointed by RE Capital 2 (Pty) Ltd to conduct a Heritage Impact Assessment (HIA) for the grid connection for the proposed development of a 75MW Photovoltaic Solar Facility near Zeerust in the Northwest Province. A 2012 study on Kameeldoorn 271



identified a number of Late Iron Age stone walled sites and finds. As a result of this a number of other alternative sites for the development were earmarked and a 2013 study had to focus on these 3 Alternatives, as well as the original study area). In March 2016 APAC cc was again contracted to look at an Expansion Area for the Plant. The need for this study was driven by the fact that in order to achieve the required generation capacity of the facility, the developers needed to expand the area under panel by a total expansion of less than 20 ha. A number of archaeological and recent historical sites and finds were identified in the study areas during the earlier assessments, and recommendations on their mitigation were provided in these documents. As part of this a Cultural Heritage Management Plan for the Zeerust Solar Plant development was commissioned by the developer. The South African Heritage Resources Agency (SAHRA) provided comments on this document, and an Amended Version of the CHMP was the result of these comments and the requirements contained in it.

Although a number of archaeological and historical sites were recorded during the various assessments, only those that fell within and close to the final footprint area of the Solar Plant were included in the Cultural Heritage Management Plan for the development. Part of the appointment of APAC cc related to the CHMP Implementation was the Fencing-in of those sites earmarked for in-situ protection, as well as a number of Monitoring Visits that had to be undertaken during the Construction Phase of the Development. The work on the site fencing was done during January 2019 and the various Monitoring Site Visits were conducted during April, July and October 2019.

In conclusion it can be said that the Site Fencing work, as well as the subsequent Monitoring Site Visits, was conducted successfully. A number of reports discussing the results of this were submitted to the client, and recommendations on required remedial actions put forward. The following Final Recommendations are made:

1. the fenced-in Archaeological Sites needs to be protected in situ in perpetuity as indicated in the Cultural Heritage Management Plan for the Development. This CHMP needs to be updated once every five years. No development work on these sites are allowed and the fences around them needs to be maintained and fixed should they be damaged
2. the recommended Site Signage at the sites needs to be changed to the more permanent Chromadek-type material and the Tswana-worded notices needs to be erected as well as a matter of urgency.
3. it should also be noted that although all efforts are made to locate, identify and record all possible cultural heritage sites and features (including archaeological remains) there is always a possibility that some might have been missed as a result of grass cover and other factors. The often subterranean nature of these resources (including low stone-packed or unmarked burials) should also be taken into consideration. Should any previously unknown or invisible sites, features or material be uncovered during any development actions then an expert should be contacted to investigate and provide recommendations on the way forward.

Thank you once again for the opportunity to be part of this project and for the commitment to preserve the archaeological sites at the Zeerust Solar PV Plant Project Site.

Should there be any questions or comments on this document and its contents please contact me directly.

Kind regards,



Anton Pelsler



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**PHOTOVOLTAIC SOLAR FACILITY ON PORTIONS OF THE FARMS KAMEELDOORN 271JP & KRUISRIVIER 270JP, INCLUDING THE NEW ALTERNATIVE EXPANSION AREAS, ZEERUST, NORTHWEST PROVINCE.** Unpublished Report APELSER ARCHAEOLOGICAL CONSULTING cc. APAC019/76. For: RE Capital 2 (RF) (Pty) Ltd. July 2019.

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