

Our Ref:



an agency of the
Department of Arts and Culture

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

Enquiries: Elijah Dumisani Katsetse

Tel: 0214624502

Email: ekatsetse@sahra.org.za

CaseID: 19211

Date: Tuesday August 16, 2022

Page No: 1

Final Comment

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

Attention: Cape Environmental Assessment Practitioners

PO Box 2070
George
6530

Doornhoek 1 PV Facility North West Province

Cape Environmental Assessment Practitioners (Cape EAPrac) has been appointed by Doornhoek PV (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed development of the Doornhoek 1 PV facility and associated infrastructure located on Portion 18 of the Farm Doornhoek No. 372-IP near Haartebeestfontein, Matlosana Local Municipality, Dr. Kenneth Kaunda District Municipality, North West Province.

A draft Basic Assessment Report has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The scope of work entails the construction of a 115 MWac PV facility with a 132 substation, OHPL and Eskom Switching station with associated infrastructure that includes a Battery Energy Storage System, site and internal access roads (up to 8m wide), operation and maintenance building, temporary and permanent laydown area, perimeter and security fencing, rainwater tank and grid connection infrastructure.

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

van der Walt, J. April 2022. Heritage Impact Assessment for the Proposed Doornhoek 1 PV Facility and Associated Infrastructure, Klerksdorp, North West Province.

The specialist undertook both a desktop and field assessment of the broad and project area. It is noted that the project area is characterised by dense vegetation that restricted heritage visibility that also limited access in some areas. However, during the survey the remains of structures and low density scatters of Stone Age artefacts were recorded. The broad geographic area is known to contain archaeological sites with the



an agency of the
Department of Arts and Culture

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

Bosworth Rock engraving National Monument (Site DH008) located approximately 7km to the northeast with another rock art site on the Farm Bosworth (Site DH007) located approximately 300 meters to the north of the project area. The following sites were identified in and around the project area:

DH001, Isolated Middle Stone Age artefact described as an irregular core on quartzite brought to the surface by an animal burrow of Low significance. **DH003** is also an MSA lithic scatter of Low significance, and **DH005**, is a large collection of MSA artefacts (<20 artefacts p.m²) identified on a fairly open area (50 x 50m) marked by gravel. The section seems to have been cleared of vegetation either by the cattle or through farming activities. The feature is located outside the impact area and it is given a significance and field rating of Medium Significance.

DH002: Structure, a large historical farmstead with associated out buildings covering an area of approximately 100 x 100m. Structures include an old farmhouse, storage area and various other buildings. Certain portions are still in use for various farming activities. The farmstead is located outside of the impact area and it is given a significance and field rating of Medium Significance.

DH004: Is a small stone packed kraal with prominent walls. The kraal is about 10 x 5m in size and is situated on a small rocky hill. The stones were sourced at this location. DH004/1 are remnants of a packed stone foundation that is mostly buried under the thick grass cover. Some features at this location may be the remnants of packed stone graves. These features are located outside the impact area and are given a significance and field rating of Medium to High significance with possibility of graves.

DH006: Ruin, these are remnants of a packed stone foundation or structure situated within an extremely overgrown thicket of large eucalyptus trees. Only a 10m section of packed stone foundation is visible. The site is extremely overgrown and the layout and extent difficult to define. The site is located outside the impact area and is given a significance and field rating of Low Significance.

The following recommendations are provided by the specialist:

- Implementation of a Chance Find Procedure for the project (as outlined in section 10.2),
- A heritage walkdown of the final impact areas prior to construction,
- Visual recommendations for the structures at DH002 as per the Visual Impact Assessment (Stead 2022), should be adhered to including retaining the existing windbreaks and planting trees around



an agency of the
Department of Arts and Culture

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

Enquiries: Elijah Dumisani Katsetse

Tel: 0214624502

Email: ekatsetse@sahra.org.za

CaseID: 19211

Date: Tuesday August 16, 2022

Page No: 3

DH002. Key landscape elements associated with the farm must be retained around the farm site as a No-go area,

- Known heritage sites in the area should be indicated on the development plans and avoided during all phases of the project.

Bamford, M. April 2022. Desktop Study (Phase 1): Palaeontological Impact Assessment for the proposed Doornhoek 1 PV Facility on Farm Doornhoek 372 IP, north of Kleksdorp, North West Province.

The proposed site lies on the Kameeldoorns Formation (Platberg Group, Ventersdorp Supergroup) that could have trace fossils such as stromatolites in the limestone or dolomite. None has been recovered from this formation to date. Nonetheless, a Fossil Chance Fine Protocol should be added to the EMP. Base on this information it is recommended that no further palaeontological impact assessment is required unless fossils are found by the contractor, developer, environmental officer or other designated responsible person once excavations for the foundations and amenities have commenced. The impact would be Low, therefore, as far as the palaeontology is concerned, the project should be authorised.

Final Comment

The SAHRA's APM Unit has received the draft BAR as part of the Environmental Authorisation process, attached to the BAR are heritage specialist studies. SAHRA supports the recommendation made in the reports by respective specialists and has no objections to the project.

SAHRA inserts the following comments as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMP:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed expansion;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development;
- A report for the heritage walkdown must be submitted to SAHRA for commenting prior to construction. Construction may not commence without feedback from SAHRA on the walkdown report.
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed

Our Ref:



an agency of the
Department of Arts and Culture

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

Enquiries: Elijah Dumisani Katsetse

Tel: 0214624502

Email: ekatsetse@sahra.org.za

CaseID: 19211

Date: Tuesday August 16, 2022

Page No: 4

development, SAHRA APM Unit (Elijah Katsetse/Phillip Hine 021 462 4502) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;

- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Ngqalabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA with regards to offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
 - The Final BAR and EMPr must be submitted to SAHRA for record purposes;
 - The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case.

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

Yours faithfully

Elijah Dumisani Katsetse
Heritage Officer
South African Heritage Resources Agency

Our Ref:



an agency of the
Department of Arts and Culture

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

Enquiries: Elijah Dumisani Katsetse

Tel: 0214624502

Email: ekatsetse@sahra.org.za

CaseID: 19211

Date: Tuesday August 16, 2022

Page No: 5

Phillip Hine

Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/602658>

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.