MAINSTREAM RENEWABLE POWER SOUTH AFRICA

CONCENTRATED SOLAR POWER EIA - DROOGFONTEIN

Heritage Impact Assessment

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Checked by:	Name and Surname
For:	SiVEST Environmental Division

Declaration of Independence

The report has been completed by PGS Heritage & Grave Relocation Consultants an appointed Heritage Specialist for SiVest. The views stipulated in this report are purely objective and no other interests are displayed during the decision making processes discussed in the Heritage Impact Assessment Process that includes the Scoping as well as this final report

HERITAGE CONSULTANT: PGS Heritage & Grave Relocation Consultants

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SIGNATURE: ______________________________

Executive Summary

PGS Heritage & Grave Relocation Consultants was appointed by SiVest Environmental Division to undertake a Heritage Impact Assessment that forms part of the Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) for the Concentrated Solar Project for Mainstream Renewable Power South Africa situated on the farm Droogfontein 62 close to Kimberley in the Northern Cape Province.

Heritage resources are unique and non-renewable and as such any impact on such resources must be seen as significant.

The archaeological field work identified 5 site of varying heritage value. Four site were identified as archaeological and the remaining site as a recent historic site with no heritage significance.

Archaeological Sites

The four archaeological sites were all low density scatters of Middel Stone Age artefacts that were exposed by earth works around an existing quarry and dry pans in the southern section of the larger study area. All the sites are of low archaeological significance. However, mitigation measures to document the artefacts and the site have been taken by recording the site/artefacts on the landscape by means of a GPS, sketch and photography for inclusion in the PGS and SAHRA Archaeological Resources Sites Database.

Palaeontology

The Palaeontological desktop study found that, the impact of the proposed development on local fossil heritage considered to be *low* and specialist palaeontological mitigation is not considered necessary.

The following general mitigation measures are recommended:

a. A monitoring plan must be agreed upon by all the stakeholders for the different phases of the project focussing on the areas where earthmoving will occur.
b. If during construction any possible finds are made, the operations must be stopped and the qualified archaeologist be contacted for an assessment of the find.
c. Should substantial fossil remains (e.g. well-preserved fossil fish, reptiles or petrified wood) be exposed during construction, however, the ECO should carefully safeguard these, preferably in situ, and alert SAHRA as soon as possible so that appropriate action (e.g. recording, sampling or collection) can be taken by a professional palaeontologist.
d. A management plan must be developed for managing the heritage resources in the surface area impacted by operations during construction and operation of the development. This includes basic training for construction staff on possible finds, action steps for mitigation measures, surface collections, excavations, and communication routes to follow in the case of a discovery.

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HERITAGE IMPACT ASSESSMENT

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1 INTRODUCTION

PGS Heritage & Grave Relocation Consultants was appointed by Sivest Environmental Division to undertake a Heritage Impact Report that forms part of the Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) for the Concentrated Solar Project for Mainstream Renewable Power South Africa, on the farm Droogfontein 62 close to Kimberley in the Northern Cape Province.

1.1 Scope of the Study

The aim of the study is to identify possible heritage sites and finds that may occur in the proposed development area. The Heritage Impact Assessment aims to inform the Environmental Impact Assessment in the development of a comprehensive Environmental Management Plan to assist the developer in managing the discovered heritage resources in a responsible manner, in order to protect, preserve, and develop them within the framework provided by the National Heritage Resources Act of 1999 (Act 25 of 1999) (NHRA).

1.2 Specialist Qualifications

There Heritage Impact Assessment (Including the Scoping and this Report) was compiled by PGS Heritage & Grave Relocation Consultants (PGS).

The staff at PGS has a combined experience of nearly 40 years in the heritage consulting industry. PGS and its staff have extensive experience in managing HIA processes. PGS will only undertake heritage assessment work where they have the relevant expertise and experience to undertake that work competently.

Wouter Fourie, Principal Archaeologist for this project, and the two field archaeologist, Henk Steyn and Marko Hutton are registered with the Association of Southern African Professional Archaeologists (ASAPA) and has CRM accreditation within the said organisation.

Since 2002 Dr Almond has also carried out palaeontological impact assessments for developments and conservation areas in the Western, Eastern and Northern Cape under the aegis of his Cape Town-based company Natura Viva cc. He is a long-standing member of the Archaeology, Palaeontology and Meteorites Committee for Heritage Western Cape (HWC) and an advisor on palaeontological conservation and management issues for the Palaeontological Society of South Africa (PSSA), HWC and SAHRA. He is currently compiling technical reports on the provincial palaeontological heritage of Western, Northern and Eastern Cape for SAHRA and

HWC. Dr Almond is an accredited member of PSSA and APHAP (Association of Professional Heritage Assessment Practitioners – Western Cape).

1.3 Assumptions and Limitations

Not subtracting in any way from the comprehensiveness of the fieldwork undertaken, it is necessary to realise that the heritage resources located during the fieldwork do not necessarily represent all the possible heritage resources present within the area. Various factors account for this, including the subterranean nature of some archaeological sites and the current dense vegetation cover. As such, should any heritage features and/or objects not included in the present inventory be located or observed, a heritage specialist must immediately be contacted.

Such observed or located heritage features and/or objects may not be disturbed or removed in any way until such time that the heritage specialist had been able to make an assessment as to the significance of the site (or material) in question. This applies to graves and cemeteries as well. In the event that any graves or burial places are located during the development the procedures and requirements pertaining to graves and burials will apply as set out below.

1.4 Legislative Context

The identification, evaluation and assessment of any cultural heritage site, artefact or find in the South African context is required and governed by the following legislation:

i. National Environmental Management Act (NEMA) Act 107 of 1998
ii. National Heritage Resources Act (NHRA) Act 25 of 1999
iii. Minerals and Petroleum Resources Development Act (MPRDA) Act 28 of 2002
iv. Development Facilitation Act (DFA) Act 67 of 1995

The following sections in each Act refer directly to the identification, evaluation and assessment of cultural heritage resources.

i. National Environmental Management Act (NEMA) Act 107 of 1998
    a. Basic Environmental Assessment (BEA) – Section (23)(2)(d)
    b. Environmental Scoping Report (ESR) – Section (29)(1)(d)
    c. Environmental Impacts Assessment (EIA) – Section (32)(2)(d)
    d. Environmental Management Plan (EMP) – Section (34)(b)
ii. National Heritage Resources Act (NHRA) Act 25 of 1999
    a. Protection of Heritage resources – Sections 34 to 36; and
    b. Heritage Resources Management – Section 38
iii. Minerals and Petroleum Resources Development Act (MPRDA) Act 28 of 2002

a. Section 39(3)

iv. Development Facilitation Act (DFA) Act 67 of 1995

a. The GNR.1 of 7 January 2000: Regulations and rules in terms of the Development Facilitation Act, 1995. Section 31.

The NHRA stipulates that cultural heritage resources may not be disturbed without authorization from the relevant heritage authority. Section 34 (1) of the NHRA states that "no person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority…". The NEMA (No 107 of 1998) states that an integrated environmental management plan should (23:2 (b)) "…identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage". In accordance with legislative requirements and EIA rating criteria, the regulations of SAHRA and Association of Southern African Professional Archaeologists (ASAPA) have also been incorporated to ensure that a comprehensive legally compatible AIA report is compiled.

Terminology

Abbreviations	***Description***
AIA	Archaeological Impact Assessment
ASAPA	Association of South African Professional Archaeologists
CRM	Cultural Resource Management
DEA	Department of Environmental Affairs
DWA	Department of Water Affairs
EIA practitioner	Environmental Impact Assessment Practitioner
EIA	Environmental Impact Assessment
ESA	Early Stone Age
GPS	Global Positioning System
HIA	Heritage Impact Assessment
I&AP	Interested & Affected Party
LSA	Late Stone Age
LIA	Late Iron Age
MSA	Middle Stone Age
MIA	Middle Iron Age
NEMA	National Environmental Management Act
NHRA	National Heritage Resources Act
PHRA	Provincial Heritage Resources Agency
PSSA	Palaeontological Society of South Africa
ROD	Record of Decision
SADC	Southern African Development Community
SAHRA	South African Heritage Resources Agency

Archaeological resources

This includes:

i. 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;
ii. 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;
iii. 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 in the Maritimes Zones Act, 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;
iv. features, structures and artefacts associated with military history which are older than 75 years and the site on which they are found.

Cultural significance

This means aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance

Development

This means any physical intervention, excavation, or action, other than those caused by natural forces, which may in the opinion of the heritage authority in any way result in the change to the nature, appearance or physical nature of a place or influence its stability and future well-being, including:

i. construction, alteration, demolition, removal or change in use of a place or a structure at a place;
ii. carrying out any works on or over or under a place;
iii. subdivision or consolidation of land comprising a place, including the structures or airspace of a place;
iv. constructing or putting up for display signs or boards;
v. any change to the natural or existing condition or topography of land; and
vi. any removal or destruction of trees, or removal of vegetation or topsoil

Heritage resources

This means any place or object of cultural significance

2 TECHNICAL DETAILS OF THE PROJECT

2.1 Site Location and Description

Droogfontein – Solar Energy Plant

Location	(Lat -28.5943; Long 24.7578) The site is 15km North of the town of Kimberley in the Northern Cape
Land	11,000 Hectares of land under option, expect to subdivide areas as needed. The land owners are a farming Communal Property Association with good contacts in the local community.
Land Description	The land is greenfield veld (bush) type, zoned for agricultural use however not used at present. The land is generally flat sloping slightly up to the North. Slope on-site does not exceed 3 degrees. There are several pans (areas subject to seasonal flooding) in the Southern section of the site the areas of which will not be used for PV development. There are areas to the North which are currently used for agricultural purposes which are excluded from development for a PV project.

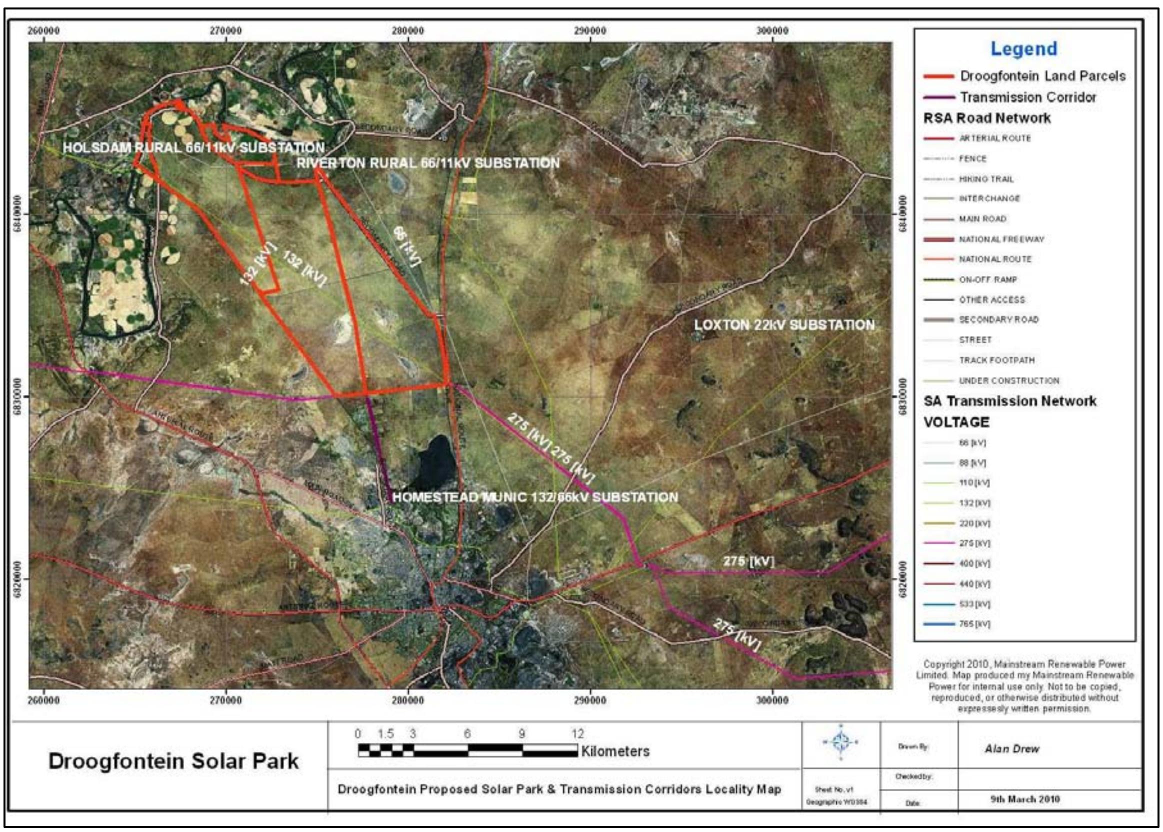

Figure 1: Droogfontein Solar Park locality

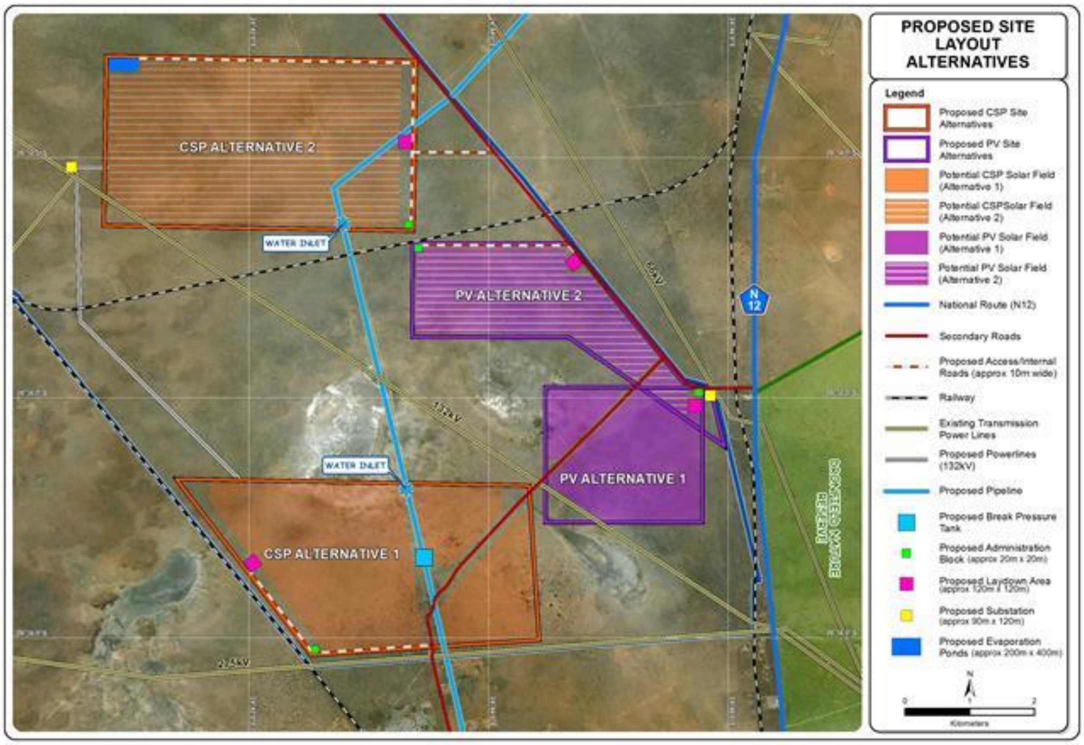

Figure 2: Droogfontein Solar Park Layout

2.2 Technical Project Description

The CSP and CPV/ PV components are described in detail below

2.2.1 CSP Project Description

The project will consist of two components:

a. CSP Power Plant
b. Associated infrastructure

- CSP Power Plant

The Concentrated Solar Power plant will consist of the following infrastructure

a. Solar field
b. Power block
c. Water Pipeline

d. Evaporation ponds
e. Buildings

These are described in detail below:

a. Solar field

The solar field will consist of parabolic trough mirrors. The mirrors require an area of approximately 600 hectares. This area will be required to be graded with terraces if required depending on the slope of the site.

Figure 3: Parabolic trough solar collector assembly

The parabolic trough plants will have solar collector assemblies (***Figure 3***) which hold the mirrors and the solar energy receivers in place. The assemblies are oriented south-north and are able to rotate on one axis during the day to track the sun as it moves.

Depending on the soil conditions on site, the foundations for the parabolic troughs could be Shallow foundations or deep foundations. Shallow foundations refer to concrete slabs which are laid close to the surface of the soil and spread the load of the trough to the earth near the surface.

If the soils on site are not suitable (e.g. compressible soils) then deep foundations will be required, however it is unlikely that foundations deeper than 1m will be required.

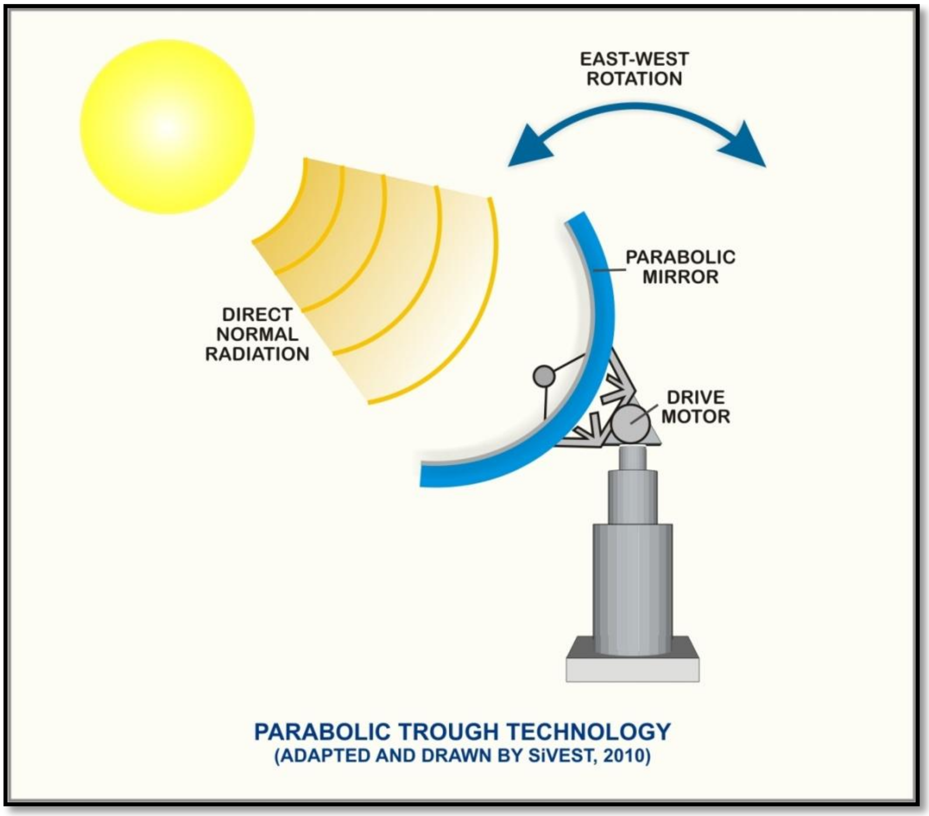

Figure 4: Functioning of the Parabolic Troughs

The rotation of the parabolic mirrors is typically operated using hydraulic arms (***Figure 4***). Maximum height of the mirrors during rotation will be approximately 8 meters above ground level. The mirrors are manufactured from low-iron glass, typically between 4-5mm in thickness. Solar energy is collected in the receivers which transfer that energy to synthetic oil, typically Therminol (VP-1), which is piped throughout the solar field. Therminol is a heat transfer fluid designed to meet the demanding requirements of high temperature systems.

b. Power Block

The solar field will have a Power Block where the heat captured in the solar field is converted into electrical energy. The principal components (***Figure 5***) of the power block are solar steam generators (which include heat exchangers where heat in the synthetic oil Heat Transfer Fluid is used to generate steam), a Steam Turbine (which converts the energy in the steam to electricity) and a Wet Cooling Tower (which cools the condenser and condenses the process steam).

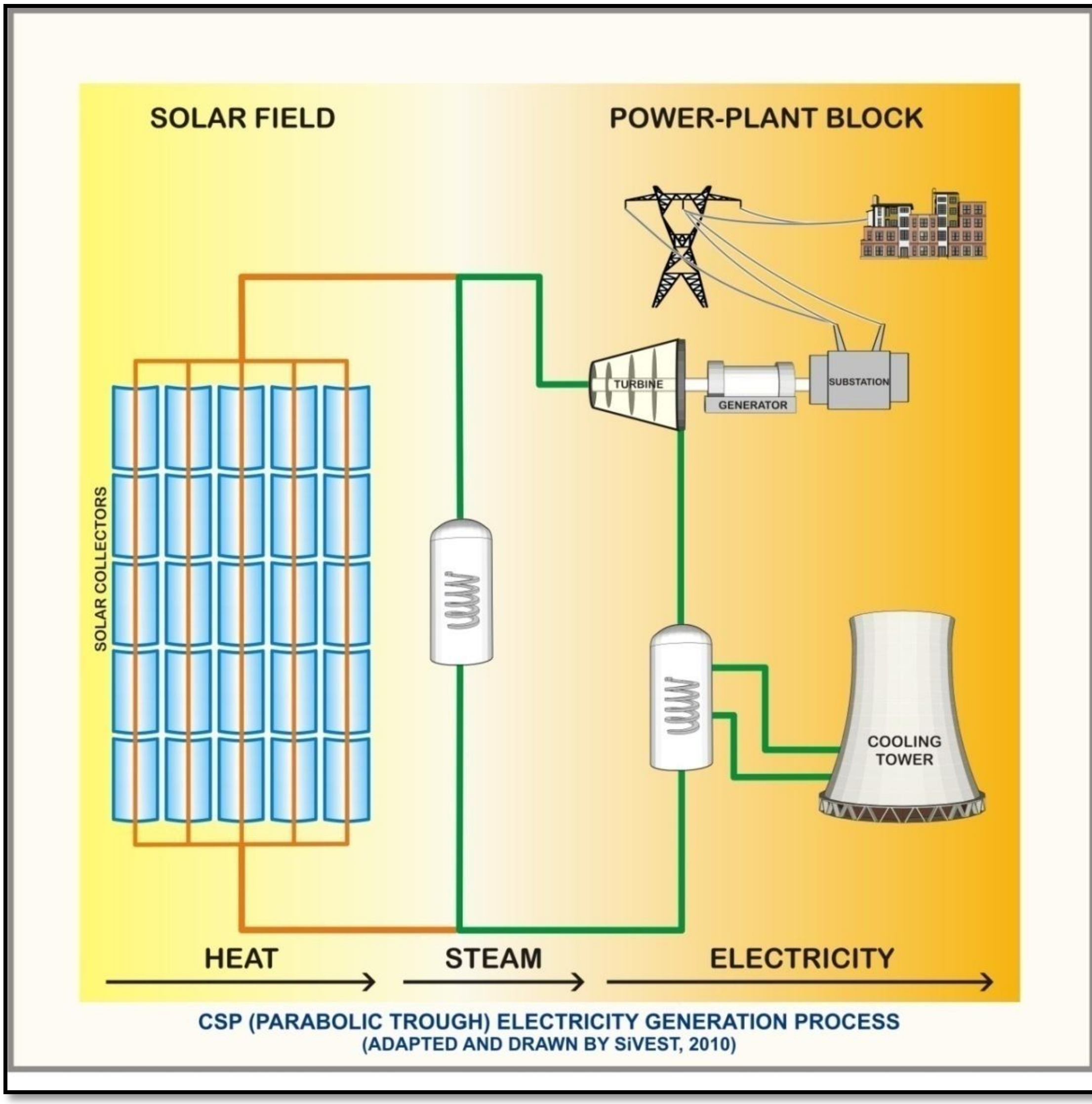

Figure 5: The CSP Process illustrated

c. Water Pipeline

A water pipeline will be used to deliver cooling water to the cooling tower. It is envisaged that a 350mm diameter pipe will be sufficient to provide required flow. Water will be sourced from the Municipal Sewage Treatment Plant (south of Kamfers Pan). At this stage, two alternatives are possible: to route the pipeline along the railway line to the east of the site and then onto the site where required or to make use of the proposed water pipeline which the municipality are planning. This pipeline is being constructed to release pressure on Kamfers Pan and place water into Piet Els‟ pan on the adjacent property to Droogfontein.

d. Evaporation ponds

An Evaporation Pond(s) for storage of waste water (e.g. cycle water blowdown, chemical waste water, etc) will be installed adjacent to the solar field (***Figure 6***).

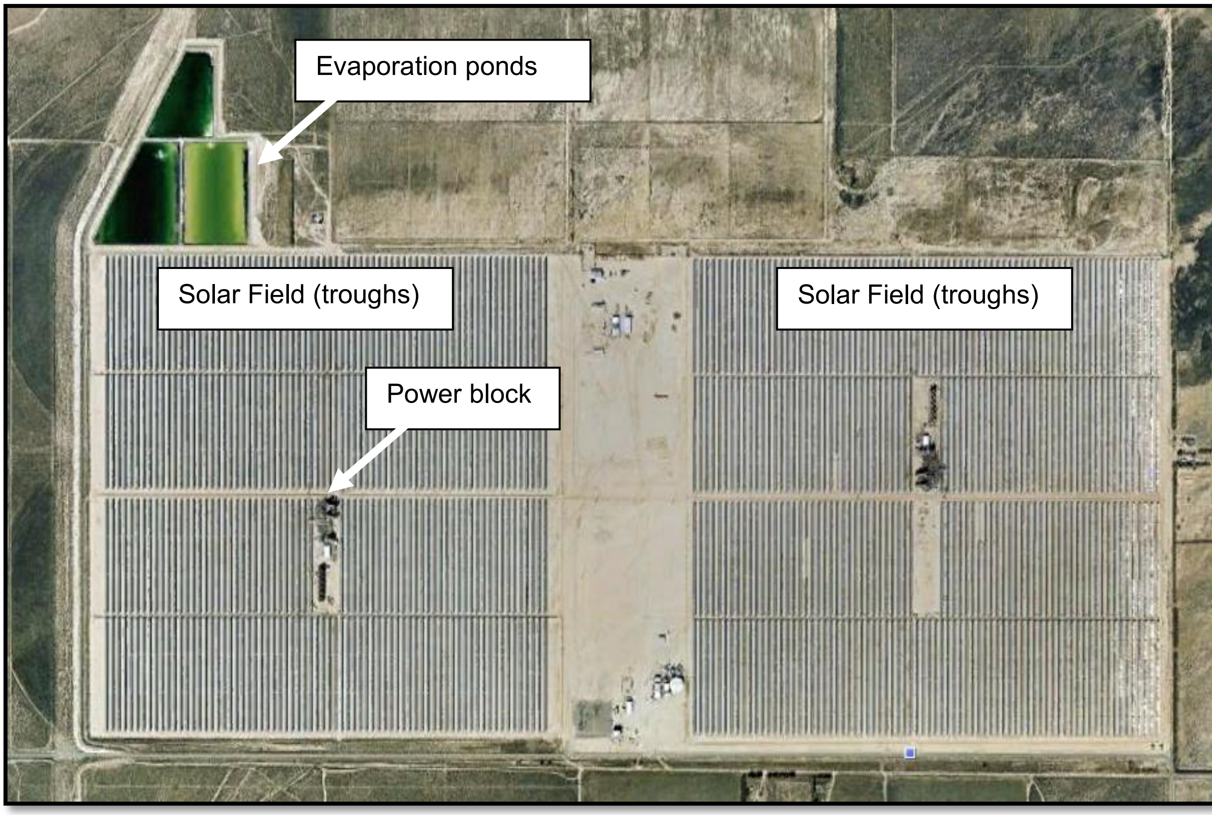

Figure 6: Google Earth Image© of the SEGS VIII and IX parabolic trough plants (Combined 160MW capacity) – Harper Lake, USA

- Associated infrastructure

a. Building infrastructure

The solar field will require on site buildings which will relate to the daily operation of the plant. The plant will require administration buildings (offices) (12m high, 70m long, 12m wide), a control room which may be housed in the main power block (16m high, 30m long, 30m wide). a fabrication building for the solar field (12m high, 150m long, 40m wide) and possibly a warehouse for storage. The office will be used for telecoms and ablution facilities will be included. Security will be required. Small amounts of fuel and oils associated with the solar field will be stored on site. These amounts will be below the thresholds requiring environmental assessments as stipulated in the NEMA EIA regulations. All materials will be bunded accordingly.

b. Thermal Storage tanks

Thermal Storage tanks will be on site which will contain several thousand tonnes of salt associated with the functioning of a CSP plant.

c. Water Treatment Plant

A water treatment plant will be installed to ensure that the water removed from the sewage treatment plant is suitable for the cooling process.

d. Electrical Connections

The project will provide electricity which will need to feed into the national grid. In order for this to occur, a new distribution substation needs to be constructed. The distribution substation compound will be approximately 90m x 120m in size and will ideally be located in close proximity to the existing power lines that traverse part of the site of the proposed development. The distribution substation voltage is unknown at this stage. It will include transformer bays which will contain transformer oils. Bunds will be constructed to ensure that any oil spills are suitably attenuated and not released into the environment. The distribution substation will be fenced for security purposes.

If the substation is located beside the existing power line the connection to the line will be via drop-down conductors. If the line is remote from the substation the connection will be by overhead power line, using either pole or pylon construction depending on the voltage. This will be determined in the EIA phase.

e. Roads

Upgrading of certain existing public roads along the equipment transport route may need to take place. An access road with a gravel surface from an adjacent public road onto the site will be required. An internal site road network to provide access to the solar field, power block & other infrastructure (substation & buildings) will also be required. Existing farm roads will be used where possible. The site road network will include turning circles for large trucks, passing points and where necessary, may include culverts over gullies and rivers/ drainage lines. All site roads will require a width of approximately 10m. Drainage trenches along the side of the internal road network will be installed. In addition, silt traps at the outfall of the drainage trenches to existing watercourses will be installed.

f. Fencing

For health and safety and security reasons, the plant will be required to be fenced off from the surrounding farm.

g. Solar Resource Measuring Station

A permanent solar resource measuring station which will measure $100m^2$ and 5m in height will be required on site to measure incoming solar radiation levels on the site.

h. Temporary work areas / activities during construction

A lay down area of a maximum of 10 000m^2, adjacent to the site or access route will be required. This will be temporary in nature (unless the property owner wishes to continue using it long term). Associated with this will be the contractors site offices which will require a maximum of 5000m^2. This will be leased from the landowner and rehabilitated after construction.

i. Borrow pits

Borrow pits may be required, which are subject to appropriate permits via a separate process. These would be distributed around the site. Existing borrow pits will be used as far as possible. The size of these pits will be dependent on the terrain and need for granular fill material for use in construction.

The need and locality of these borrow pits will be determined in the EIA phase.

At the end of construction these pits will be backfilled as much as possible using surplus excavated material from the foundations and vegetation will be rehabilitated as indicated in the EMPR

2.2.2 CPV/PV Project Description

The CPV/PV will consist of two components:

j. CPV/PV Power Plant
k. Associated infrastructure

- CPV/PV Solar Power Plant

  The CPV/ PV plant will consist of the following infrastructure

  a. Solar field
  b. Buildings

These are described in detail below:

a. Solar field

Concentrated Photovoltaic (CPV) or Photovoltaic (PV) panel arrays with approximately 160 000 panels will be installed. An area of approximately 2km^2 is likely to be required for the CPV/PV. The area required does not need to be cleared or graded however no tall vegetation such as trees can remain on the site.

The panel arrays are approximately 15m x 4m in area. These are mounted into metal frames which are usually aluminium. Concrete or screw pile foundations are used to support the panel arrays. The arrays are either fixed on a tracking system (CPV is always on a tracking system and contains a slightly different panel) or tilted at a fixed angle equivalent to the latitude at which the site is located in order to capture the most sun (***Figure 7***). Arrays usually reach up to between 5m and 10m above ground level. Either a CPV or PV plant will be installed.

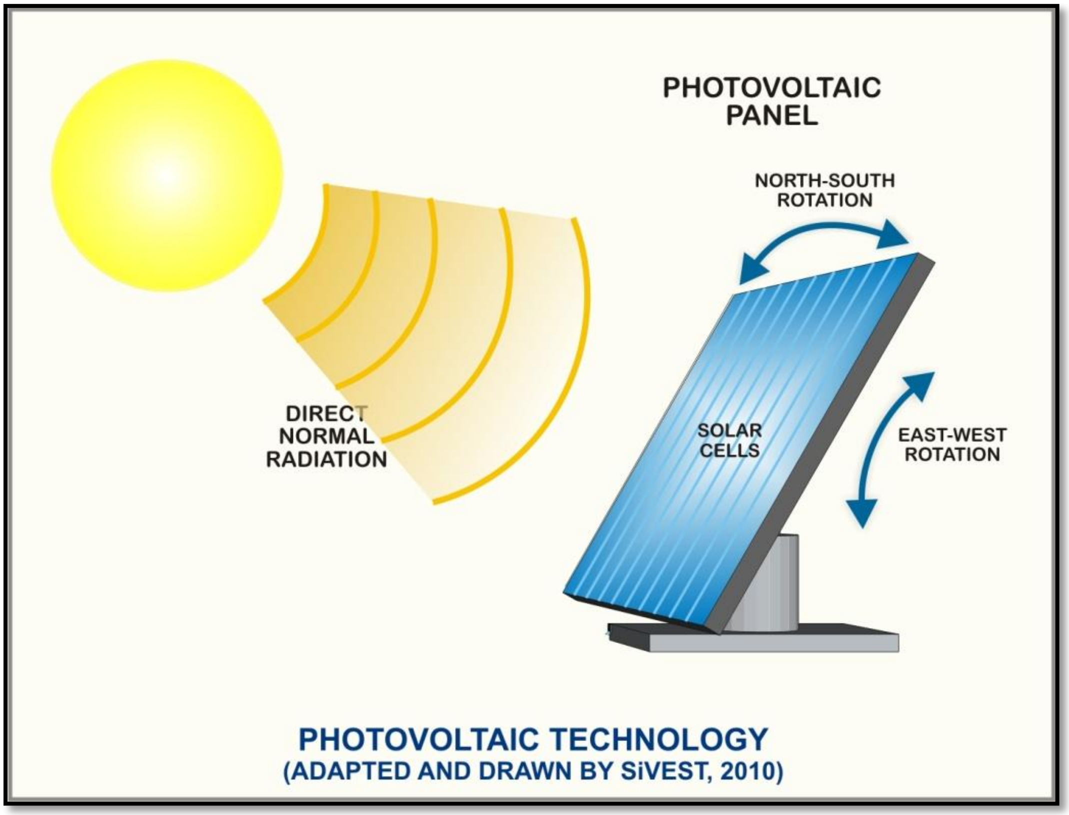

Figure 7: Illustration of how a CPV panel operates

b. Building infrastructure

The solar field will require on site buildings which will relate to the daily operation of the plant. The plant will require administration buildings (office) and possibly a warehouse for storage. The buildings will likely be a single storey building with warehouse / workshop space & access (e.g. 5m high, 20m long, and 20m wide). The office will be used for telecoms and ablution facilities will be included. Security will be required.

- Associated infrastructure

a. Electrical Infrastructure

The PV arrays are typically connected to each other in strings and the strings connected to DC to AC inverters (***Figure 8***). The DC to AC inverters may be mounted on the back of the panel"s support substructures / frames or alternatively in a central inverter station. The strings are connected to the inverters by low voltage DC cables. Power from the inverters is collected in medium voltage transformers through AC cables. Cables may be buried or pole-mounted depending on voltage level and site conditions.

The medium voltage transformers can be compact transformers distributed throughout the solar field or alternatively located in a central sub-station. It is likely to be a central substation in this instance.

The substation will be approximately 90m x 120m in size and will ideally be located in close proximity to the existing power lines that traverse a part of the site. The substation will be a distribution substation and will include transformer bays which will contain transformer oils. Bunds will be constructed to ensure that any oil spills are suitably attenuated and not released into the environment. The substation will be securely fenced.

If the substation is beside the existing power line the connection to the line will be via drop-down conductors. If the line is remote from the substation the connection will be by a newly constructed overhead power line, using either pole or pylon construction depending on the voltage.

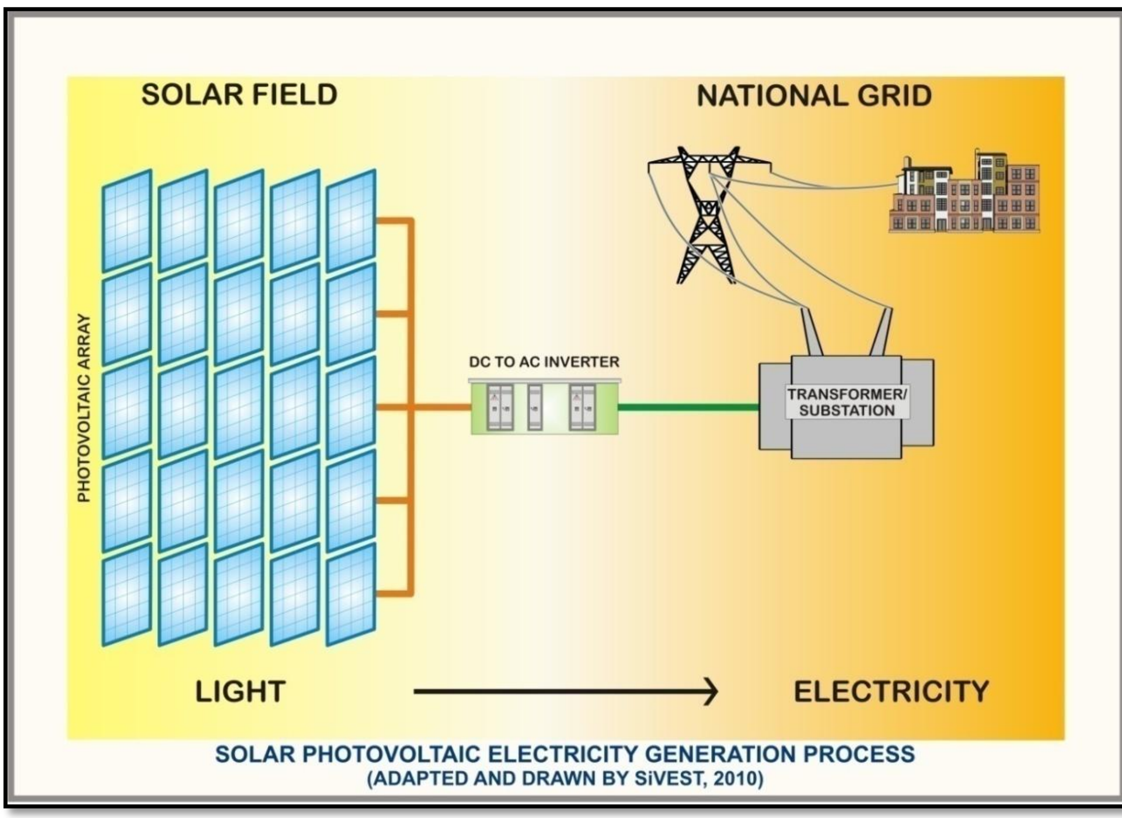

Figure 8: CPV/PV process

b. Roads

Upgrading of certain existing public roads along the equipment transport route may take place. An access road with a gravel surface from the public road onto the site will be required. An internal site road network to provide access to the solar field, power block & other infrastructure (substation & buildings) will also be required. Existing farm roads will be used where possible. The site road network will include turning circles for large trucks, passing points and where necessary, may include culverts over gullies and rivers/ drainage lines. All site roads will require a width of approximately 10m. Drainage trenches along the side of the internal road network will be installed. In addition, silt traps at the outfall of the drainage trenches to existing watercourses will be installed.

c. Fencing

For health & safety and security reasons, the plant will be required to be fenced off from the surrounding farm.

d. Solar Resource Measuring Station

A permanent solar resource measuring station which will measure 100m^2 and which will be 5m in height will be required on site to measure incoming solar radiation levels on the site.

e. Temporary work areas / activities during construction

A lay down area of a maximum of 10 000m^2, adjacent to the site or access route will be required. This will be temporary in nature (unless the property owner wishes to continue using it in the long term). Associated with this will be a contractor"s site offices which will require a maximum of 5000m^2.

f. Borrow pits

Borrow pits may be required, which are subject to appropriate permits via a separate process. These would be distributed around the site. Existing borrow pits will be used as far as possible. The size of these pits will be dependent on the terrain and need for granular fill material for use in construction.

At this stage these are not required however this will be determined prior to construction and the correct procedure followed.

At the end of construction these pits will be backfilled as much as possible using surplus excavated material from the foundations and vegetation will be rehabilitated as indicated in the EMPR

3 ASSESSMENT METHODOLOGY

The section below outlines the assessment methodologies utilised in the study.

This Heritage Impact Assessment (HIA) report was compiled by PGS Heritage and Grave Relocation Consultants (PGS) for the proposed Droogfontein Project .The applicable maps, tables and figures, are included as stipulated in the NHRA (no 25 of 1999), the National Environmental Management Act (NEMA) (no 107 of 1998) and the Minerals and Petroleum Resources Development Act (MPRDA) (28 of 2002). The HIA process consisted of three steps:

- Step I – Literature Review: The background information to the field survey leans greatly on the Heritage Scoping Report completed by PGS for this site in September 2010.

- Step II – Physical Survey: A physical survey was conducted on foot through the proposed project area by qualified archaeologists (February 2011), aimed at locating and documenting sites falling within and adjacent to the proposed development footprint.

- Step III – The final step involved the recording and documentation of relevant archaeological resources, as well as the assessment of resources in terms of the heritage impact assessment criteria and report writing, as well as mapping and constructive recommendations

The significance of heritage sites was based on four main criteria:

- **site integrity** (i.e. primary vs. secondary context),
- **amount of deposit, range of features** (e.g., stonewalling, stone tools and enclosures),
    - Density of scatter (dispersed scatter)
        - Low - <10/50m^2
        - Medium - 10-50/50m^2
        - High - >50/50m^2
- **uniqueness** and
- **potential**to answer present research questions.

Management actions and recommended mitigation, which will result in a reduction in the impact on the sites, will be expressed as follows:

A - No further action necessary;
B - Mapping of the site and controlled sampling required;
C - No-go or relocate pylon position
D - Preserve site, or extensive data collection and mapping of the site; and
E - Preserve site

Impacts on these sites by the development will be evaluated as follows

Site Significance

Site significance classification standards prescribed by the South African Heritage Resources Agency (2006) and approved by the Association for Southern African Professional Archaeologists (ASAPA) for the Southern African Development Community (SADC) region, were used for the purpose of this report.

Table 1: Site significance classification standards as prescribed by SAHRA

FIELD RATING	GRADE	SIGNIFICANCE	RECOMMENDED MITIGATION
National Significance (NS)	Grade 1	-	Conservation; National Site nomination
Provincial Significance (PS)	Grade 2	-	Conservation; Provincial Site nomination
Local Significance (LS)	Grade 3A	High Significance	Conservation; Mitigation not advised
Local Significance (LS)	Grade 3B	High Significance	Mitigation (Part of site should be retained)
Generally Protected A (GP.A)	-	High / Medium Significance	Mitigation before destruction
Generally Protected B (GP.B)	-	Medium Significance	Recording before destruction
Generally Protected C (GP.A)	-	Low Significance	Destruction

3.1 Methodology for Impact Assessment

The EIA Methodology assists in evaluating the overall effect of a proposed activity on the environment. The determination of the effect of an environmental impact on an environmental parameter is determined through a systematic analysis of the various components of the impact. This is undertaken using information that is available to the environmental practitioner through the process of the environmental impact assessment. The impact evaluation of predicted impacts was undertaken through an assessment of the significance of the impacts.

3.1.1 Determination of Significance of Impacts

Significance is determined through a synthesis of impact characteristics which include context and intensity of an impact. Context refers to the geographical scale i.e. site, local, national or global whereas Intensity is defined by the severity of the impact e.g. the magnitude of deviation from background conditions, the size of the area affected, the duration of the impact and the overall probability of occurrence. Significance is calculated as shown in **Table 2**.

Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The total number of points scored for each impact indicates the level of significance of the impact.

3.1.2 Impact Rating System

Impact assessment must take account of the nature, scale and duration of effects on the environment whether such effects are positive (beneficial) or negative (detrimental). Each issue / impact is also assessed according to the project stages:

- planning
- construction
- operation
- decommissioning

Where necessary, the proposal for mitigation or optimisation of an impact should be detailed. A brief discussion of the impact and the rationale behind the assessment of its significance has also been included.

- Rating System Used To Classify Impacts

The rating system is applied to the potential impact on the receiving environment and includes an objective evaluation of the mitigation of the impact. Impacts have been consolidated into one rating. In assessing the significance of each issue the following criteria (including an allocated point system) is used:

Table 2: Description

NATURE		
Include a brief description of the impact of environmental parameter being assessed in the context of the project. This criterion includes a brief written statement of the environmental aspect being impacted upon by a particular action or activity.		
GEOGRAPHICAL EXTENT		
This is defined as the area over which the impact will be expressed. Typically, the severity and significance of an impact have different scales and as such bracketing ranges are often required. This is often useful during the detailed assessment of a project in terms of further defining the determined.		
1	Site	The impact will only affect the site
2	Local/district	Will affect the local area or district
3	Province/region	Will affect the entire province or region
4	International and National	Will affect the entire country
PROBABILITY		
This describes the chance of occurrence of an impact		
1	Unlikely	The chance of the impact occurring is extremely low (Less than a 25% chance of occurrence).
2	Possible	The impact may occur (Between a 25% to 50% chance of occurrence).
3	Probable	The impact will likely occur (Between a 50% to 75% chance of occurrence).
4	Definite	Impact will certainly occur (Greater than a 75% chance of occurrence).
REVERSIBILITY		
This describes the degree to which an impact on an environmental parameter can be successfully reversed upon completion of the proposed activity.		
1	Completely reversible	The impact is reversible with implementation of minor mitigation measures
2	Partly reversible	The impact is partly reversible but more intense mitigation measures are required.
3	Barely reversible	The impact is unlikely to be reversed even with intense mitigation measures.
4	Irreversible	The impact is irreversible and no mitigation measures exist.

IRREPLACEABLE LOSS OF RESOURCES		
This describes the degree to which resources will be irreplaceably lost as a result of a proposed activity.		
1	No loss of resource.	The impact will not result in the loss of any resources.
2	Marginal loss of resource	The impact will result in marginal loss of resources.
3	Significant loss of resources	The impact will result in significant loss of resources.
4	Complete loss of resources	The impact is result in a complete loss of all resources.
DURATION		
This describes the duration of the impacts on the environmental parameter. Duration indicates the lifetime of the impact as a result of the proposed activity		
1	Short term	The impact and its effects will either disappear with mitigation or will be mitigated through natural process in a span shorter than the construction phase (0 – 1 years), or the impact and its effects will last for the period of a relatively short construction period and a limited recovery time after construction, thereafter it will be entirely negated (0 – 2 years).
2	Medium term	The impact and its effects will continue or last for some time after the construction phase but will be mitigated by direct human action or by natural processes thereafter (2 – 10 years).
3	Long term	The impact and its effects will continue or last for the entire operational life of the development, but will be mitigated by direct human action or by natural processes thereafter (10 – 50 years).
4	Permanent	The only class of impact that will be non-transitory. Mitigation either by man or natural process will not occur in such a way or such a time span that the impact can be considered transient (Indefinite).

CUMULATIVE EFFECT		
This describes the cumulative effect of the impacts on the environmental parameter. A cumulative effect/impact is an effect which in itself may not be significant but may become significant if added to other existing or potential impacts emanating from other similar or diverse activities as a result of the project activity in question.		
1	Negligible Cumulative Impact	The impact would result in negligible to no cumulative effects
2	Low Cumulative Impact	The impact would result in insignificant cumulative effects
3	Medium Cumulative impact	The impact would result in minor cumulative effects
4	High Cumulative Impact	The impact would result in significant cumulative effects

INTENSITY/ MAGNITUDE		
Describes the severity of an impact		
1	Low	Impact affects the quality, use and integrity of the system/component in a way that is barely perceptible.
2	Medium	Impact alters the quality, use and integrity of the system/component but system/ component still continues to function in a moderately modified way and maintains general integrity (some impact on integrity).
3	High	Impact affects the continued viability of the system/ component and the quality, use, integrity and functionality of the system or component is severely impaired and may temporarily cease. High costs of rehabilitation and remediation.
4	Very high	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component permanently ceases and is irreversibly impaired (system collapse). Rehabilitation and remediation often impossible. If possible rehabilitation and remediation often unfeasible due to extremely high costs of rehabilitation and remediation.

SIGNIFICANCE		
Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. This describes the significance of the impact on the environmental parameter. The calculation of the significance of an impact uses the following formula: (Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity. The summation of the different criteria will produce a non weighted value. By multiplying this value with the magnitude/intensity, the resultant value acquires a weighted characteristic which can be measured and assigned a significance rating.		
Points	**Impact Significance Rating**	**Description**
6 to 28	Negative Low impact	The anticipated impact will have negligible negative effects and will require little to no mitigation.
6 to 28	Positive Low impact	The anticipated impact will have minor positive effects.
29 to 50	Negative Medium impact	The anticipated impact will have moderate negative effects and will require moderate mitigation measures.
29 to 50	Positive Medium impact	The anticipated impact will have moderate positive effects.
51 to 73	Negative High impact	The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact.
51 to 73	Positive High impact	The anticipated impact will have significant positive effects.
74 to 96	Negative Very high impact	The anticipated impact will have highly significant effects and are unlikely to be able to be mitigated adequately. These impacts could be considered "fatal flaws".
74 to 96	Positive Very high impact	The anticipated impact will have highly significant positive effects.

The 2010 regulations also specify that alternatives must be compared in terms of impact assessment.

4 CURRENT STATUS QUO

4.1.1 Site Description

The Droogfontein site is divided into two sections by a rail line. The northern section is characterised by grassland and low density woodlands slightly rising towards a low ridge in the northern section of the study area. This part of the study area is situated relatively close to the Vaal River. The southern section is characterised by flat grassland interspersed with low density woodlands and a small number of pans.

4.1.2 Archival findings

- Archaeology

At present no data could be obtained from the McGregor Museum on archaeological sites in and around the study area.

Nooitgedacht Rock Art Site

This National Monument is situated on the farm Nooitgedact (adjacent to the farm Droogfontein) and contains 3 sections of glaciated pavement with over 250 Bushman and Khoe rock engravings (**Figure 9**)

Figure 9:(Khoi)San Engraving of and Eland on glacial pavement at Nooitgedacht (http://commons.wikimedia.org/wiki/File:Rock_Art_at_Nooitgedacht.jpg)

South African War

A study of archival information indicates the presence of the redoubts and encampments of the Boer forces during the South African war of 1899-1902 just outside the study area (Figure 10).

During the South African War, also referred to as the Anglo Boer war, Kimberley was besieged by Boer forces from 14 October 1899 to 15 February 1900. For 4 moths the Boer forces placed a total lock down on the town of Kimberley and besieged it until the town was relief by General French on 15 February 1900. For the Siege to be of any success the Boer forces needed to construct numerous redoubts and encampments around the town to control access in and out of town. Georefencing of available archival maps as shown in **Figure 10** made it possible to plot these positions with relation to the proposed development area (**Figure 11**).

The southern western border of the study area is close to an Intermediate pumping station which was the area where the Head Quarters of the Boer command were established during the siege while the south eastern section is close to the vicinity of the low ridge just north of the Falstead farm where a set of boer redoubts where positioned (**Figure 11**).

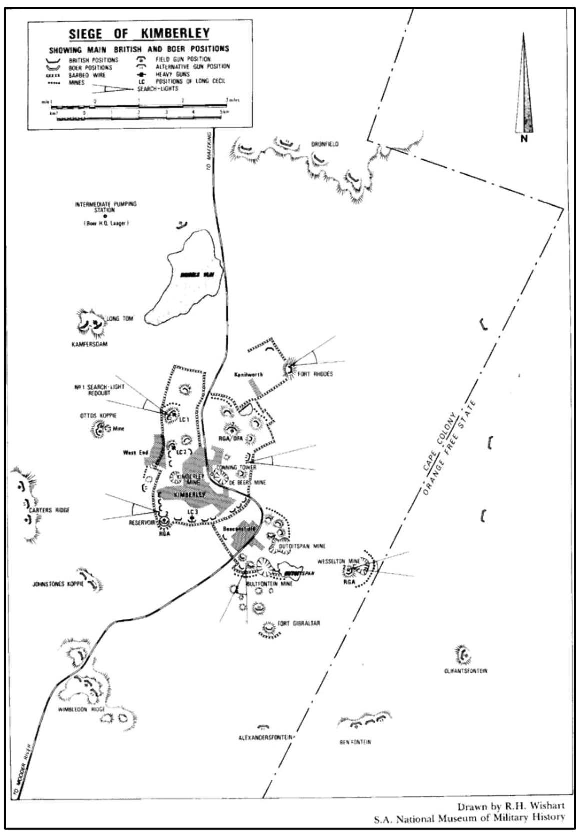

Figure 10 – Archival map of Kimberley Sieg - Georeferenced for plotting historical positions (www.boerwar.com)

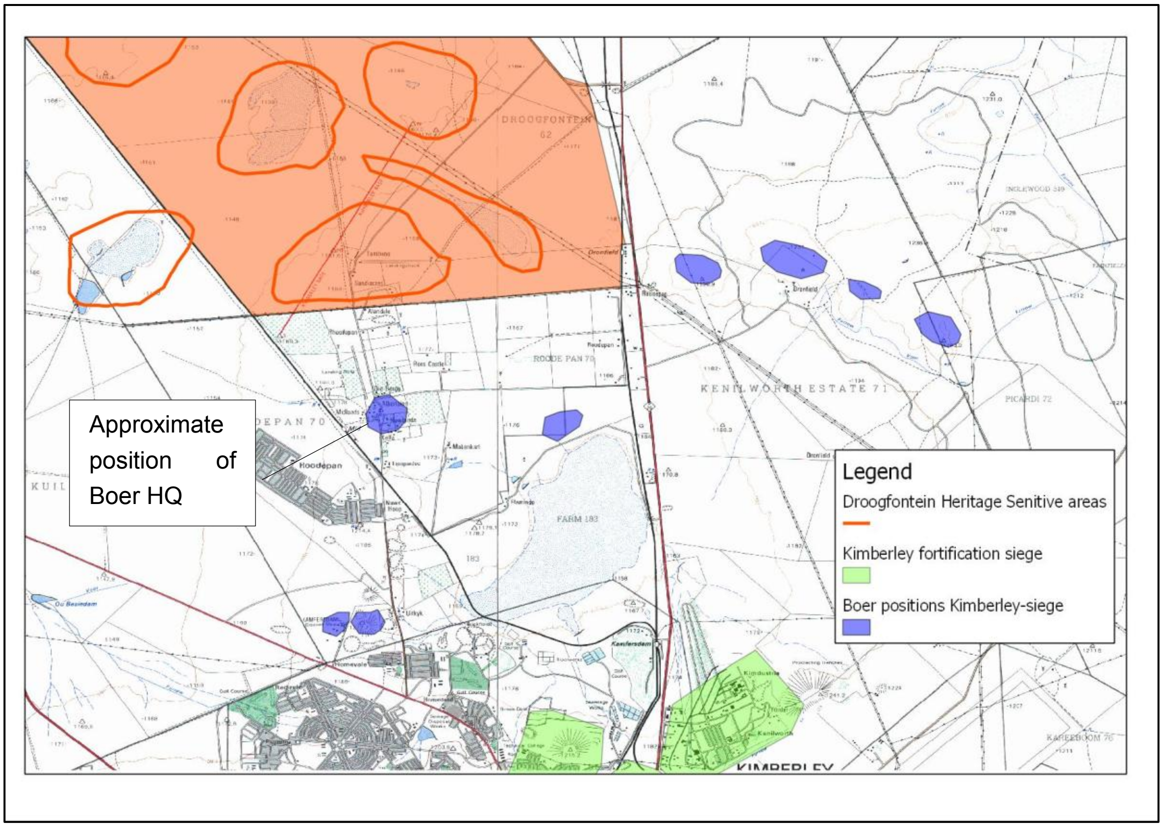

Figure 11 – Boer positions in relation to study area in red

- Palaeontology (Refer to **Appendix A** for full report)

  The proposed Droogfontein PV and CSP solar plant is underlain at depth by ancient Precambrian lavas of the Ventersdorp Supergroup (Allanridge Formation) of Late Archaean age (c. 2.7 billion years old) as well as by Early Permian mudrocks of the Ecca Group (Prince Albert Formation). Highly fossiliferous exposures of the last unit are known along the Vaal River at Douglas, c. 100km to the south-west. However, at Droogfontein the Prince Albert sediments are almost entirely mantled by several meters of aeolian sands of the Kalahari Group (Gordonia Formation) that are of low palaeontological sensitivity, as are also the associated calcretes. Potentially fossiliferous, fresh (unweathered) Prince Albert rocks are therefore unlikely to be intersected by excavations during construction. Ancient alluvial gravels of the Windsorton Formation are mapped just to the west of the study area but not on Droogfontein itself. Fossiliferous younger gravels may well occur along the banks of the Vaal River here, but are unlikely to be directly affected by the proposed solar park development. The overall impact of the proposed development on local fossil heritage is considered to be *low* and specialist palaeontological mitigation for this project is not considered necessary.

4.1.3 Findings of the Heritage Scoping Document

Evaluation of aerial photography has indicated the following area that may be sensitive from an archaeological perspective (**Figure 12**). Archaeological surveys and studies in the Northern Cape have shown rocky outcrops, dry rivers, riverbanks and confluence to be prime localities for archaeological finds and specifically Stone Age sites as these area where utilized for settlement of base camps close to water and hunting ranges.

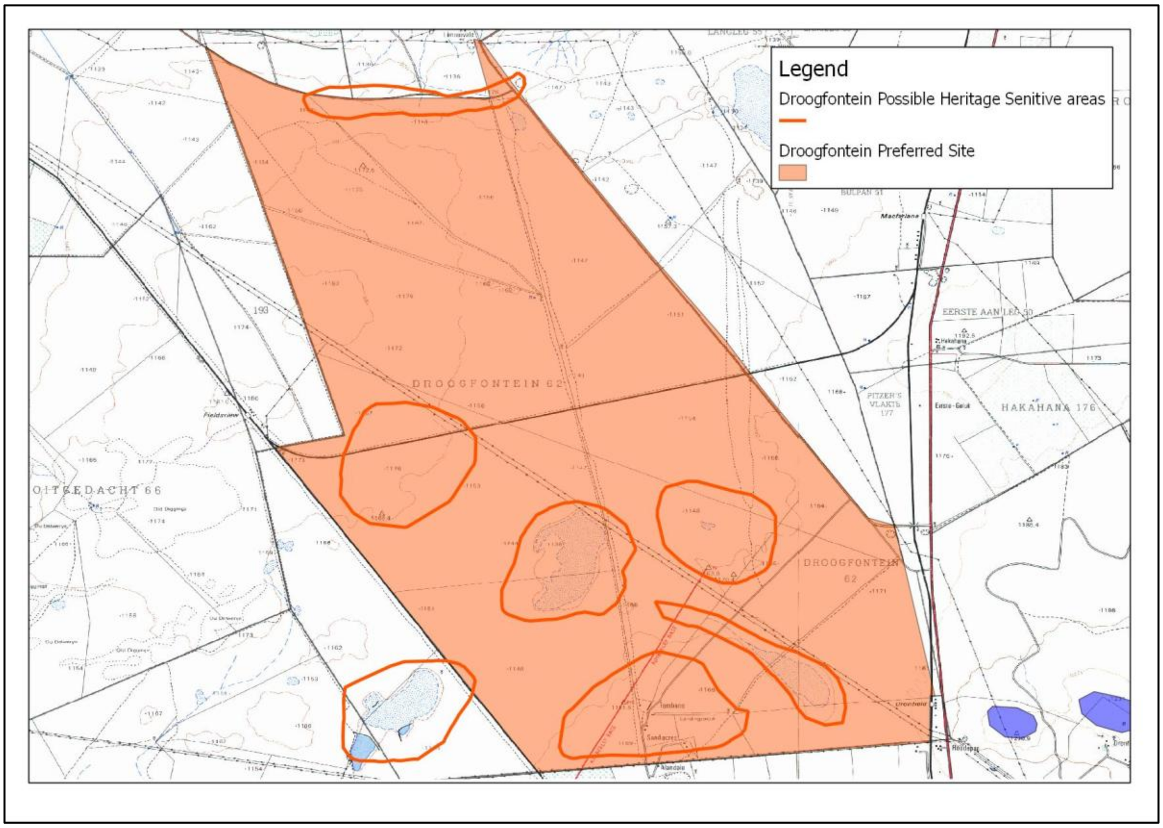

Figure 12: Possible heritage sensitive areas

To be able to compile a heritage management plan to be incorporated into the Environmental Management Plan the following further work will be required for the EIA.

- Archaeological walk through of the areas where the project will be impacting, with specific attention given to the areas around pans and outcrops;

4.1.4 Field work findings

A follow up visit to the study area was conducted in March 2011 with the aim of conducting an archaeological survey of the development area and giving particular attention to the areas identified during the Scoping phase as being potentially sensitive. Due to the size of the total study area field work focused on the areas identified in **Figure 2** & **Figure 15** as the foot print areas of the development.

The study area for this project covers approximately 11 000 hectares with impact areas of approximately 3500 hectares in total. Due to the nature of cultural remains, with the majority of artefacts occurring below surface, an intensive foot-survey that covered the study area was conducted. A controlled-exclusive surface survey was conducted over a period of 3 days on foot and by vehicle by two archaeologists of PGS.

The site is predominantly covered in Savanna grassland and falls within Northern Cape Savanna Biome (**Figure 13**). The landscape is also generally flat and is dominated by red sands (**Figure 14**). There is a sparse scatter of low sand dunes (between 1m to about 2.5m high) that forms along small exposed rock intrusions and along the banks/border of sparsely distributed salt pans (**Figure 15**). Acacia trees have colonised some of the sand dunes (**Figure 16**). In areas clear of vegetation through either natural soil erosion or anthropogenic processes such as quarrying, the undelaying calcrete layer has been exposed (**Figure 17**).

Figure 13: Type of grass cover at the site (note the flatness of the landscape), Block 2.

Figure 14: Type of sands found at the site (red sands), Block 2.

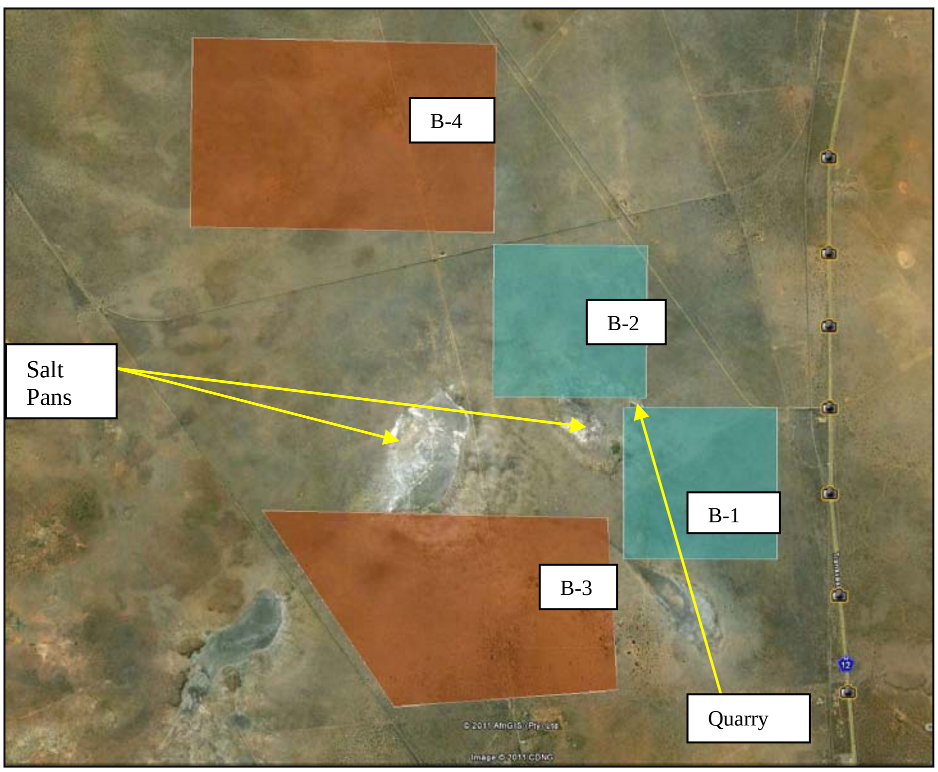

Figure 15: Google Map of the site, Droogefontein: note the distribution of salt pans and the position of the quarry in relation to the pans and surveyed area. (B: Block & 1-4 represent a sequential survey of individual blocks).


Figure 16: High raised sand dune. Note the cover by acacia trees and grass species, Block 4

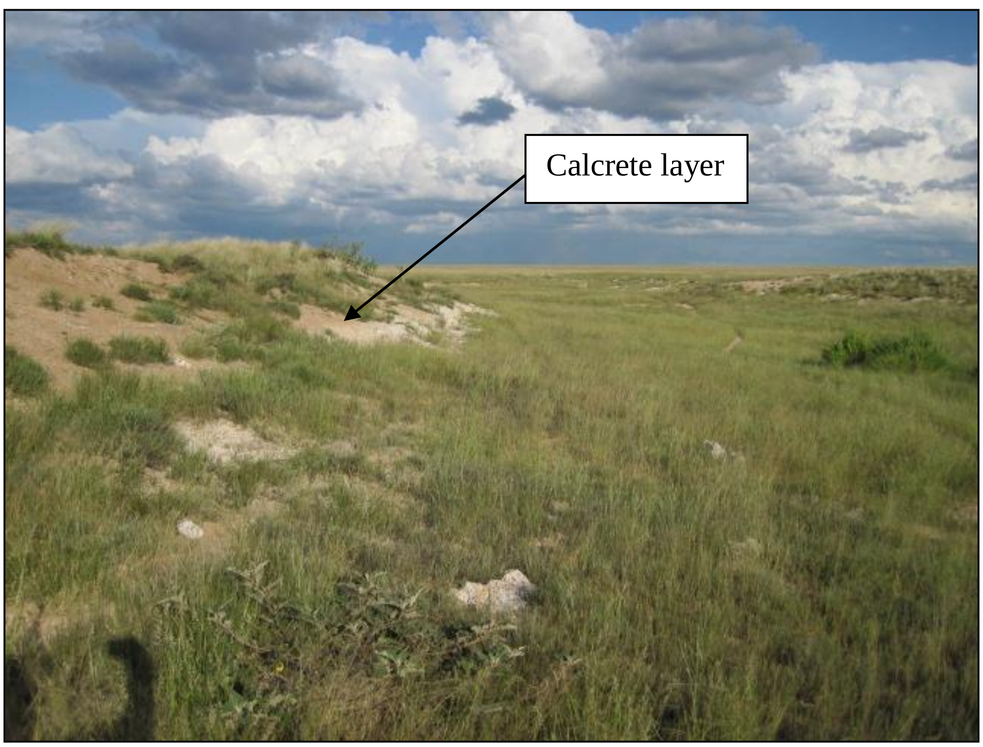

Figure 17: Calcrete layer in the quarry, Block 1

4.1.5 Archaeological Sites

The survey yielded five archaeological sites. Refer to ***Appendix B*** for positions relative to development blocks

Site 01

GPS Coords: S28 35 51.5 E24 44 34.8

Site 01 is an open scatter and is located in the calcrete layer of the quarry, about 2m from the surface of the quarry which is approximately 3.5m to 5m deep. The site itself is approximately a meter in diameter and consists of two Middle Stone Age artefacts; a utilized multipurpose tool (approx. 5.5cm x 4cm) and a snapped blade (approx. 4cm x 3.6cm) (Figure 18: Site 01, Stone tool scatter (piece of a broken blade & a flake), in the quarry, Block 1.**Figure 18**). It is located on the northern edge of the quarry and on the southern slope (**Figure 21** – red circle). The quarry is located in Block 1 of the study area (**Figure 15**). Based on the type of sands - aeolian sands of the Kalahari Group (Gordonia Formation) forming dunes that overlay the calcrete layer- the approximate relative age of the two artefacts (and other lithic artefacts located in the vicinity) are 80Ky (eighty thousand years) as the sands in the area are dated to approximately that age. The two artefacts seem to have washed/rolled down from the sandy layer of the quarry to their current context, putting them in Secondary Context. There is no indication of smaller flakes or flake debris to suggest a primary context.

No immediate threats to the site were identified with exception to possible sand cover as a result of wind that is prevalent in the region. The two artefacts were found approximately a meter apart and they were only grouped together for the purpose of photography.

The site is of low archaeological significance. However, mitigation measures to document the artefacts and the site have been taken by recording the site/artefacts on the landscape by means of a GPS, a sketch measuring their size using a centimeter scale and photography for inclusion in the PGS and SAHRA Archaeological Resources Sites Database.

Figure 18: Site 01, Stone tool scatter (piece of a broken blade & a flake), in the quarry, Block 1.

Site 02

GPS Coords: S28 35 52.1 E24 44 36.0

Site 02 is a stone scatter and consists of one big utilized blade piece (**Figure 19**). The blade is approximately 4.5cm x 4cm big and is located in the calcrete layer of the quarry, approximately 1.5 meters from the quarry surface. The quarry is located between Blocks B1 and B2 of the study area **(Figure 15**). The blade piece seems to have washed/rolled down from the sandy layer of the quarry to its current context, placing it in Secondary Context. The site is located on the eastern edge of the quarry and on the western slope (**Figure 21** – yellow circle). Based on its current stratigraphic position the artefact is found in, it would seem that it belongs to the same age as the two artefacts found in ***Site 01***.

No immediate threats to the site were identified with exception to possible sand cover as a result of wind that is prevalent in the region and which is evident with the formation of sparsely scattered sand dunes.

The site is of low archaeological significance. However, mitigation measures to document the artefacts and the site have been taken by recording the site/artefacts on the landscape by means of a GPS, a sketch, measuring their size using a centimeter scale and photography for inclusion in the PGS and SAHRA Archaeological Resources Sites Database.

Figure 19: Site 02, Stone tool (i.e. utilised flake), in the quarry, Block 1

Site 03

GPS Coords: S28 35 52.1 E24 44 34.0

Site 03, like ***Site 01 and 02***, is located in the calcrete layer of the quarry between Blocks B1 and B2 (**Figure 15**). It consists of a surface scatter of three stone tools. These were grouped together for photographic purposes (**Figure 20**). Artefacts include: a utilized (reworked) core (approx. 4cm x 3.7cm) and two flakes (4.2cm x 4cm & 3cm x 3cm). It is located on the western edge of the quarry and on its eastern slope (**Figure 21** – blue circle). Based on the stratigraphic layer that the three artefacts were found in it is suggestive that they are of the same category (Middle Stone Age) and age (80Ky) as ***Sites 01 and 02***.

The three artefacts are of low archaeological significance and were found out in Secondary Context. No immediate threats to the site were identified with exception to possible sand cover as a result of wind that is prevalent in the region and which is evident with the formation of sparsely scattered sand dunes.

Mitigation measures to document the artefacts and the site have been taken by recording the site/artefacts on the landscape by means of a GPS, a sketch, measuring their size using a centimeter scale and photography for inclusion in the PGS and SAHRA Archaeological Resources Sites Database.

Figure 20: Site 3, Stone tool scatter (a core & 2 flakes), in the quarry, Block 1.

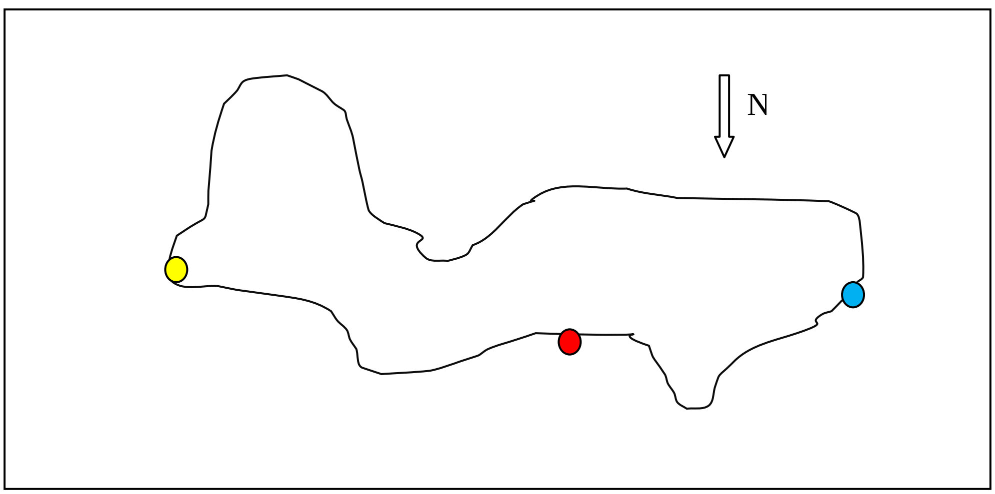

Figure 21: Sketch of the quarry and the location of site 01 (red), 02 (yellow), and 03 (blue) in the quarry.

Site 04

GPS Coords: S28 37 40.1 E24 43 29.9

Site 04 (a-c) is a recent cattle stead. Based on structural features it looks to have been built in the 1980s or early 1990s giving them an approximate date of 20-30 years. It is approximately 140m in diameter and consists of the following built environment and landscape features: cattle dip (**Figure 22**), cattle feed (**Figure 23**) and cement foundations leading to the dip. The site is located in Block 3 and southern end of the study area (**Figure 15**). The cattle dip and, feed are still in good condition

Based on its age the site is of no historic significance. However, it was deemed necessary to document it on the landscape for inclusion in the PGS and SAHRA Archaeological Resources Sites Database by means of a GPS, a plan sketch and photography.

Figure 22: Site 4a Recent, Disbanded, Cattle Dip, Block 3.

Figure 23: Site 4b, Cattle feed, Block 3

Figure 24: Site 4c cement foundations leading to the dip, Block 3.

GPS Coordinates:

Site 05

GPS Coords: S28.60064 E24.73241

Site 05 is a low density surface scatter consisting of three stone artefacts: two flakes (both approx. 5cm xc2cm) and a utilized tool (side scraper – approx. 4cm x 2cm). The site measures approximately 10m in dimension and is located on the western end of a dried pan (**Figure 25**) south of Block 3 of the study area. The tree artefacts (**Figure 26**) are from the Middle Stone Age and are likely to be of the same age as those found in ***Sites 01, 02 and 03*** if we take into account the relative age of the sands that have formed the sparsely distributed sand dunes in the area. The pan is located some 20 to 30m from the base of one of the sand dunes in the study area.

The three artefacts were grouped together for the purpose of photography and the site is of low archaeological significance. However, mitigation measures to document the artefacts and the site have been taken by recording the site/artefacts on the landscape by means of a GPS, sketch and photography for inclusion in the PGS and SAHRA Archaeological Resources Sites Database.

Figure 25: Site 5 in the pan. Note the position of stone tool scatter put together and a scale, Block 3. GPS Coordinates:

Figure 26: Stone tool scatter on the western edge of a dried up pan (Figure 25), Block 3.

Summary

Very sparse stone tool scatters were discovered during the survey. Those found to be in close proximity were group together to form a site. Four of the sites are stone tool scatters and one is a recent cattle post that consists of a dip, foundations and cattle feeding structure.

No graves and burial sites were discovered during the survey; informal interview or personal conversation with one of the senior farm worker in Droogfontein by the name of Mr. Bob Sekole confirm to this finding.

5 IMPACT ASSESSMENT

5.1 Potential Impacts during Construction

ISSUE	Impact on archaeological sites
POTENTIAL IMPACTS	Unidentified archaeological sites and the discovery of such sites during construction can seriously hamper construction timelines.
EMP	Management measures to be included in the EMP for chance finds

ISSUE	Impact on palaeontological sites
POTENTIAL IMPACT	Unidentified palaeontological sites and the discovery of such sites during construction can seriously hamper construction timelines.
EMP	Management measures to be included in the EMP for chance finds

ISSUE	Impact on historical sites
PREDICTED IMPACT	No sites identified during field work
EMP	Management measures to be included in the EMP for chance finds.

ISSUE	Impact on graves and cemeteries site
POSSIBLE IMPACT	Unidentified graves and cemeteries and the discovery of such structures during construction can seriously hamper construction timelines.
EMP	In the event that these graves and cemeteries could not be avoided a grave relocation proses needs to be started. Such a process impacts on the spiritual and social fabric of the next of kin and associated communities. Management measures for such finds must be included in the EMP

5.2 Potential Impacts during Operation

Same as construction

5.3 Impact Matrix

Table 3: Rating Matrix for impacts in the Construction phase

IMPACT TABLE FORMAT	
Environmental Parameter	*Discovery of previously unidentified heritage sites (archaeological, palaeontological, historical or grave sites)*
Issue/Impact/Environmental Effect/Nature	*During construction activity and earthmoving archaeological material could be unearthed that was previously unidentified due to its position.*
Extent	*In most cases confined to small areas on the site*
Probability	*Due to the close proximity to water course, localised archaeological finds may possibly occur*
Reversibility	*In most cases where such finds are made damaged is irreversible*

IMPACT TABLE FORMAT		
Irreplaceable loss of resources	*Significant loss but in most cases the scientific data recovered will mitigate such losses*	
Duration	*Permanent*	
Cumulative effect	*Low cumulative impact*	
Intensity/magnitude	*Medium*	
Significance Rating	*The impact is anticipated as being low and localised but will vary due to type of heritage find that could be made*	
	Pre-mitigation impact rating	Post mitigation impact rating
Extent	1	1
Probability	2	1
Reversibility	4	2
Irreplaceable loss	4	3
Duration	4	4
Cumulative effect	2	1
Intensity/magnitude	2	1
Significance rating	-24 (Low negative)	-11 (low negative)
Mitigation measures	*A heritage monitoring program that will identify finds during construction will be able to mitigate the impact on the finds through scientific documentation of finds and provide valuable data on any finds made.*	

Table 4: Rating Matrix for impacts on decommissioning phase

IMPACT TABLE FORMAT	
Environmental Parameter	*Discovery of previously unidentified heritage sites (archaeological, palaeontological, historical or grave sites)*
Issue/Impact/Environmental Effect/Nature	*During decommissioning activity and earthmoving archaeological material could be unearthed that was previously unidentified due to its position.*
Extent	*In most cases confined to small areas on the site*
Probability	*Due to the close proximity to water course, localised archaeological finds may possibly occur*
Reversibility	*In most cases where such finds are made damaged is irreversible*

IMPACT TABLE FORMAT		
Irreplaceable loss of resources	*Significant loss but in most cases the scientific data recovered will mitigate such losses*	
Duration	*Permanent*	
Cumulative effect	*Low cumulative impact*	
Intensity/magnitude	*Magnitude dependent on type of finds made – however in most cases Medium*	
Significance Rating	*The impact is anticipated as being low and localised but will vary due to type of heritage find that could be made*	
	Pre-mitigation impact rating	Post mitigation impact rating
Extent	1	1
Probability	2	1
Reversibility	4	2
Irreplaceable loss	4	3
Duration	4	4
Cumulative effect	2	1
Intensity/magnitude	2	1
Significance rating	-24 (Low negative)	-11 (low negative)
Mitigation measures	*A heritage monitoring program that will identify finds during decommissioning will be able to mitigate the impact on the finds through scientific documentation of finds and provide valuable data on any finds made.*	

5.4 Confidence in Impact Assessment

It is necessary to realise that the heritage resources located during the fieldwork do not necessarily represent all the possible heritage resources present within the area. Various factors account for this, including the subterranean nature of some heritage sites.

The impact assessment conducted for heritage sites assumes the possibility of finding heritage resources during the project life and has been conducted as such.

5.5 Cumulative Impacts

None foreseen

5.6 Reversibility of Impacts

Although heritage resources are seen as non-renewable the mitigation of impacts on possible finds through scientific documentation will provided sufficient mitigation on the impacts on possible heritage resources.

6 MITIGATION MEASURES

6.1 Management Guidelines

1. The National Heritage Resources Act (Act 25 of 1999) states that, any person who intends to undertake a development categorised as-

(a) the construction of a road, wall, transmission line, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;

(b) the construction of a bridge or similar structure exceeding 50m in length;

(c) any development or other activity which will change the character of a site-

- (i) exceeding 5 000 m^2 in extent; or
- (ii) involving three or more existing erven or subdivisions thereof; or
- (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or
- (iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;

(d) the re-zoning of a site exceeding 10 000 m^2 in extent; or

(e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.

In the event that an area previously not included in an archaeological or cultural resources survey is to be disturbed, the South African Heritage Resources Agency (SAHRA) needs to be contacted. An enquiry must be lodged with them into the necessity for a Heritage Impact Assessment.

2. In the event that a further heritage assessment is required it is advisable to utilise a qualified heritage practitioner preferably registered with the Cultural Resources Management Section (CRM) of the Association of Southern African Professional Archaeologists (ASAPA).

   This survey and evaluation must include:

(a) The identification and mapping of all heritage resources in the area affected;

(b) An assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6 (2) or prescribed under section 7 of the National Cultural Resources Act;

(c) An assessment of the impact of the development on such heritage resources;

(d) An evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development;

(e) The results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources;

(f) If heritage resources will be adversely affected by the proposed development, the consideration of alternatives; and

(g) Plans for mitigation of any adverse effects during and after the completion of the proposed development.

3. It is advisable that an information section on cultural resources be included in the SHEQ training given to contractors involved in surface earthmoving activities. These sections must include basic information on:
   a. Heritage;
   b. Graves;
   c. Archaeological finds; and
   d. Historical Structures.

   This module must be tailor made to include all possible finds that could be expected in that area of construction.
4. In the event that a possible find is discovered during construction, all activities must be halted in the area of the discovery and a qualified archaeologist contacted.
5. The archaeologist needs to evaluate the finds on site and make recommendations towards possible mitigation measures.
6. If mitigation is necessary, an application for a rescue permit must be lodged with SAHRA.
7. After mitigation an application must be lodged with SAHRA for a destruction permit. This application must be supported by the mitigation report generated during the rescue excavation. Only after the permit is issued may such a site be destroyed.
8. If during the initial survey sites of cultural significance is discovered, it will be necessary to develop a management plan for the preservation, documentation or destruction of such a site. Such a program must include an archaeological/palaeontological monitoring programme, timeframe and agreed upon schedule of actions between the company and the archaeologist.
9. In the event that human remains are uncovered or previously unknown graves are discovered a qualified archaeologist needs to be contacted and an evaluation of the finds made.
10. If the remains are to be exhumed and relocated, the relocation procedures as accepted by SAHRA needs to be followed. This includes an extensive social consultation process.

The definition of an archaeological/palaeontological monitoring programme is a formal program of observation and investigation conducted during any operation carried out for non-archaeological reasons. This will be within a specified area or site on land, inter-tidal zone or underwater, where there is a possibility that archaeological deposits may be disturbed or destroyed. The programme will result in the preparation of a report and ordered archive.

The purpose of an archaeological/palaeontological monitoring programme is:

- To allow, within the resources available, the preservation by record of archaeological/palaeontological deposits, the presence and nature of which could not be established (or established with sufficient accuracy) in advance of development or other potentially disruptive works
- To provide an opportunity, if needed, for the watching archaeologist to signal to all interested parties, before the destruction of the material in question, that an archaeological/palaeontological find has been made for which the resources allocated to the watching brief itself are not sufficient to support treatment to a satisfactory and proper standard.
- A monitoring is not intended to reduce the requirement for excavation or preservation of known or inferred deposits, and it is intended to guide, not replace, any requirement for contingent excavation or preservation of possible deposits.
- The objective of the monitoring is to establish and make available information about the archaeological resource existing on a site.

PGS can be contacted on the way forward in this regard.

Table 5: Roles and responsibilities of archaeological and heritage management

ROLE	RESPONSIBILITY	IMPLEMENTATION
A responsible specialist needs to be allocated and should sit in at all relevant meetings, especially when changes in design are discussed, and liaise with SAHRA.	The client	Archaeologist and a competent archaeology supportive team
If chance finds and/or graves or burial grounds are identified during construction or operational phases, a specialist must be contacted in due course for evaluation.	The client	Archaeologist and a competent archaeology supportive team
Comply with defined national and local cultural heritage regulations on management plans for identified sites.	The client	Environmental Consultancy and the Archaeologist
Consult the managers, local communities and other key stakeholders on mitigation	The client	Environmental Consultancy and the

of archaeological sites.		Archaeologist
Implement additional programs, as appropriate, to promote the safeguarding of our cultural heritage. (i.e. integrate the archaeological components into employee induction course).	The client	Environmental Consultancy and the Archaeologist,
If required, conservation or relocation of burial grounds and/or graves according to the applicable regulations and legislation.	The client	Archaeologist, and/or competent authority for relocation services
Ensure that recommendations made in the Heritage Report are adhered to.	The client	The client
Provision of services and activities related to the management and monitoring of significant archaeological sites.	The client	Environmental Consultancy and the Archaeologist
After the specialist/archaeologist has been appointed, comprehensive feedback reports should be submitted to relevant authorities during each phase of development.	Client and Archaeologist	Archaeologist

6.2 All phases of the project

6.2.1 Archaeology

Based on the findings of the HIA, all stakeholders and key personnel should undergo an archaeological induction course during this phase. Induction courses generally form part of the employees" overall training and the archaeological component can easily be integrated into these training sessions. Two courses should be organised – one aimed more at managers and supervisors, highlighting the value of this exercise and the appropriate communication channels that should be followed after chance finds, and the second targeting the actual workers and getting them to recognize artefacts, features and significant sites. This needs to be supervised by a qualified archaeologist. This course should be reinforced by posters reminding operators of the possibility of finding archaeological/palaeontological sites.

The project will encompass a range of activities during the construction phase, including ground clearance, establishment of construction camps area and small scale infrastructure development associated with the project.

It is possible that cultural material will be exposed during operations and may be recoverable, but this is the high-cost front of the operation, and so any delays should be minimised. Development surrounding infrastructure and construction of facilities results in significant disturbance, but construction trenches do offer a window into the past and it thus may be possible to rescue some of the data and materials. It is also possible that substantial alterations will be implemented during this phase of the project and these must be catered for. Temporary infrastructure is often changed or added to the subsequent history of the project. In general these are low impact developments as they are superficial, resulting in little alteration of the land surface, but still need to be catered for.

During the construction phase, it is important to recognize any significant material being unearthed, making and to make the correct judgment on which actions should be taken. A responsible archaeologist/palaeontologist must be appointed for this commission. This person does not have to be a permanent employee, but needs to sit in at relevant meetings, for example when changes in design are discussed, and notify SAHRA of these changes. The archaeologist would inspect the site and any development recurrently, with more frequent visits to the actual workface and operational areas.

In addition, feedback reports can be submitted by the archaeologist to the client and SAHRA to ensure effective monitoring. This archaeological monitoring and feedback strategy should be incorporated into the Environmental Management Plan (EMP) of the project. Should an archaeological/palaeontological site or cultural material be discovered during construction (or operation), such as burials or grave sites, the project needs to be able to call on a qualified expert to make a decision on what is required and if it is necessary to carry out emergency recovery. SAHRA would need to be informed and may give advice on procedure. The developers therefore should have some sort of contingency plan so that operations could move elsewhere temporarily while the material and data are recovered. The project thus needs to have an archaeologist/palaeontologist available to do such work. This provision can be made in an archaeological/palaeontological monitoring programme.

6.2.2 Graves

In the case where a grave is identified during construction the following measures must be taken.

Mitigation of graves will require a fence around the cemetery with a buffer of at least 20 meters.

If graves are accidentally discovered during construction, activities must cease in the area and a qualified archaeologist be contacted to evaluate the find. To remove the remains a rescue permit must be applied for with SAHRA and the local South African Police Services must be notified of the find.

Where it is then recommended that the graves be relocated a full grave relocation process that includes comprehensive social consultation must be followed.

The grave relocation process must include:

i. A detailed social consultation process, that will trace the next-of-kin and obtain their consent for the relocation of the graves, that will be at least 60 days in length;
ii. Site notices indicating the intent of the relocation
iii. Newspaper Notice indicating the intent of the relocation
iv. A permit from the local authority;
v. A permit from the Provincial Department of health;
vi. A permit from the South African Heritage Resources Agency if the graves are older than 60 years or unidentified and thus presumed older than 60 years;
vii. An exhumation process that keeps the dignity of the remains intact;
viii. An exhumation process that will safeguard the legal implications towards the developing company;
ix. The whole process must be done by a reputable company that are well versed in relocations;
x. The process must be conducted in such a manner as to safeguard the legal rights of the families as well as that of the developing company.

7 CONCLUSIONS AND RECOMMENDATIONS

The archaeological field work identified 5 site of varying heritage value. Four site were identified as archaeological and the remaining site as a recent historic site with no heritage significance.

Archaeological Sites

The four archaeological sites were all low density scatters of Middel Stone Age artefacts that were either exposed by earth works around an existing quarry or found around dry pans in the southern section of the larger study area. All the sites are of low archaeological significance. However, mitigation measures to document the artefacts and the site have been taken by recording the site/artefacts on the landscape by means of a GPS, sketch and photography for inclusion in the PGS and SAHRA Archaeological Resources Sites Database.

Palaeontology

The Palaeontological desktop study found that, the study area is underlain at depth by ancient Precambrian lavas of the Ventersdorp Supergroup (Allanridge Formation) of Late Archaean age (c. 2.7 billion years old) as well as by Early Permian mudrocks of the Ecca Group (Prince Albert Formation). Highly fossiliferous exposures of the last unit are known along the Vaal River at Douglas, c. 100km to the south-west. However, at Droogfontein the Prince Albert sediments are almost entirely mantled by several meters of aeolian sands of the Kalahari Group (Gordonia Formation) that are of low palaeontological sensitivity, as are also the associated calcretes.

Potentially fossiliferous, fresh (unweathered) Prince Albert rocks are therefore unlikely to be intersected by the shallow excavations involved during construction of the power plant. Ancient alluvial gravels of the Windsorton Formation are mapped just to the west of the study area but not on Droogfontein itself. Fossiliferous younger gravels may well occur along the banks of the Vaal River here, but are unlikely to be directly affected by the proposed solar park development. The overall impact of the proposed development on local fossil heritage is considered to be ***low*** and specialist palaeontological mitigation for this project is not considered necessary.

The following general mitigation measures are recommended:

e. A monitoring plan must be agreed upon by all the stakeholders for the different phases of the project focussing on the areas where earthmoving will occur.
f. If during construction any possible finds are made, the operations must be stopped and the qualified archaeologist be contacted for an assessment of the find.
g. Should substantial fossil remains (e.g. well-preserved fossil fish, reptiles or petrified wood) be exposed during construction, however, the ECO should carefully safeguard these, preferably in situ, and alert SAHRA as soon as possible so that appropriate action (e.g. recording, sampling or collection) can be taken by a professional palaeontologist.
h. A management plan must be developed for managing the heritage resources in the surface area impacted by operations during construction and operation of the development. This includes basic training for construction staff on possible finds, action steps for mitigation measures, surface collections, excavations, and communication routes to follow in the case of a discovery.

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Appendix A

PALAEONTOLOGICAL DESKTOP STUDY

PALAEONTOLOGICAL DESKTOP STUDY:

Proposed Droogfontein Solar Power Project on the farm Droogfontein 62 near Kimberley, Northern Cape Province

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1. SUMMARY

The proposed Droogfontein solar energy project comprises a 50MW photovoltaic (PV) plant in Phase 1 followed by a 150MW concentrated solar power (CSP) plant in Phase 2. The development site on farm Droogfontein 62 is situated on the southern side of the Vaal River some 12-15km north of Kimberley in the Northern Cape Province. The study area is underlain at depth by ancient Precambrian lavas of the VentersdorpSupergroup (Allanridge Formation) of Late Archaean age (*c.* 2.7 billion years old) as well as by Early Permian mudrocks of the Ecca Group (Prince Albert Formation). Highly fossiliferous exposures of the last unit are known along the Vaal River at Douglas, *c.* 100km to the south-west. However, at Droogfontein the Prince Albert sediments are almost entirely mantled by several meters of aeolian sands of the Kalahari Group (Gordonia Formation) that are of low palaeontological sensitivity, as are also the associated calcretes. Potentially fossiliferous, fresh (unweathered) Prince Albert rocks are therefore unlikely to be intersected by the shallow excavations involved during construction of the power plant. Ancient alluvial gravels of the Windsorton Formation are mapped just to the west of the study area but not on Droogfontein itself. Fossiliferous younger gravels may well occur along the banks of the Vaal River here, but are unlikely to be directly affected by the proposed solar park development. The overall impact of the proposed development on local fossil heritage is considered to be *low* and specialist palaeontological mitigation for this project is not considered necessary.

Should substantial fossil remains be exposed during construction, however, such as well-preserved fossil fish, reptiles or petrified wood, the ECO should safeguard these, preferably *in situ*, and alert SAHRA as soon as possible so that appropriate action (*e.g.* recording, sampling or collection) can be taken by a professional palaeontologist.

2. INTRODUCTION & BRIEF

The company Mainstream Renewable Power South Africa (MRP) is proposing to construct a solar power plant on agricultural land on the farm Droogfontein 62. The site is situated on level ground on the southern banks of the Vaal River approximately 12 to 15km north of Kimberley and 15km east of Barkley West in the Northern Cape Province. The location of the proposed development is shown in the map Fig. 1 and the proposed layout in satellite image Fig. 2. Phase 1 of the solar power plant will comprise a 50MW photovoltaic (PV) plant in two small areas in the south-eastern part of the Droogefontein study area. Phase 2 of the development envisages a 150MW concentrated solar (CSP) plant spread over two larger areas in the southern and central part of Droogfontein. The study area is bordered on the south by a 275kV transmission line and is also traversed by a 132kV transmission line. The northern sectors of Droogfontein that border the Vaal River are currently used for agricultural purposes. These sectors, as well as several pans in the south that may be subject to seasonal flooding, are to be excluded from the solar power plant developments.

Components of the Phase 1 PV solar plant of relevance to the present study include:

- a photovoltaic (PV) panel array comprising *c*. 160 000 panels over an area of approximately 2km^2. Each array is 15m x 4m in area and supported by concrete or screw pile foundations.
- building infrastructure including an office and a warehouse.
- electrical infrastructure including buried or pole-mounted cables and a central substation (*c*. 90m x 120m) or new overhead powerline or poles or pylons to an existing power line.
- new or upgraded gravels roads for access to the site as well as an internal road network. Site roads will be 10m wide and there will be drainage trenches along their sides with silt traps at the outfall of the drainage trenches into existing watercourses.
- a solar resource monitoring station (100m^2).
- a temporary lay down area of *c*. 10 000m^2 adjacent to the site or access route.
- possible new borrow pits (to be separately permitted); existing borrow pits are to be used as far as possible. Borrow pits will be backfilled after construction of the PV plant.

Components of the Phase 2 CSP solar plant of relevance to the present study include:

- a solar field of parabolic trough mirrors covering an area of approximately 600 hectares. These will require foundations of no more than 1m depth.
- power block comprising solar steam generators, a steam turbine and a wet cooling tower.
- a 350mm diameter water pipeline from the municipal sewage treatment plant (pipeline route not yet determined)
- evaporation ponds (shallow) adjacent to the solar field.
- building infrastructure including offices, a control room, a fabrication building and warehouse.

- thermal storage tanks containing salt.
- a water treatment plant.
- electrical connections, including a new distribution substation (90m x 120m) close to existing power lines; a short new overhead powerline with pylons or poles may be required.
- upgrading of existing public roads, *plus* new gravel access road and internal site road network (roads 10m wide); existing farm roads will be used as far as possible.
- solar resource monitoring station.
- temporary lay down area of up to 10 000m^2 plus temporary contractors site offices (5000m^2 or less).
- possible new borrow pits, to be infilled after construction; existing borrow pits will be used as far as possible.

The proposed solar power plant overlies potentially fossiliferous sediments of the Ecca Group (Karoo Supergroup) and Kalahari Group. Fossils preserved within the bedrock or superficial deposits may be disturbed, damaged or destroyed during the construction phase of the proposed project. The extent of the proposed development (over 5000 m^2) falls within the requirements for a Heritage Impact Assessment (HIA) as required by Section 38 (Heritage Resources Management) of the South African Heritage Resources Act (Act No. 25 of 1999). The various categories of heritage resources recognised as part of the National Estate in Section 3 of the Heritage Resources Act include, among others:

- geological sites of scientific or cultural importance
- palaeontological sites
- palaeontological objects and material, meteorites and rare geological specimens

This desktop palaeontological study has accordingly been commissioned by PGS - Heritage & Grave Relocation Consultants.

Minimum standards for the palaeontological component of heritage impact assessment reports are currently being developed by SAHRA. The latest version of the SAHRA guidelines is dated May 2007.

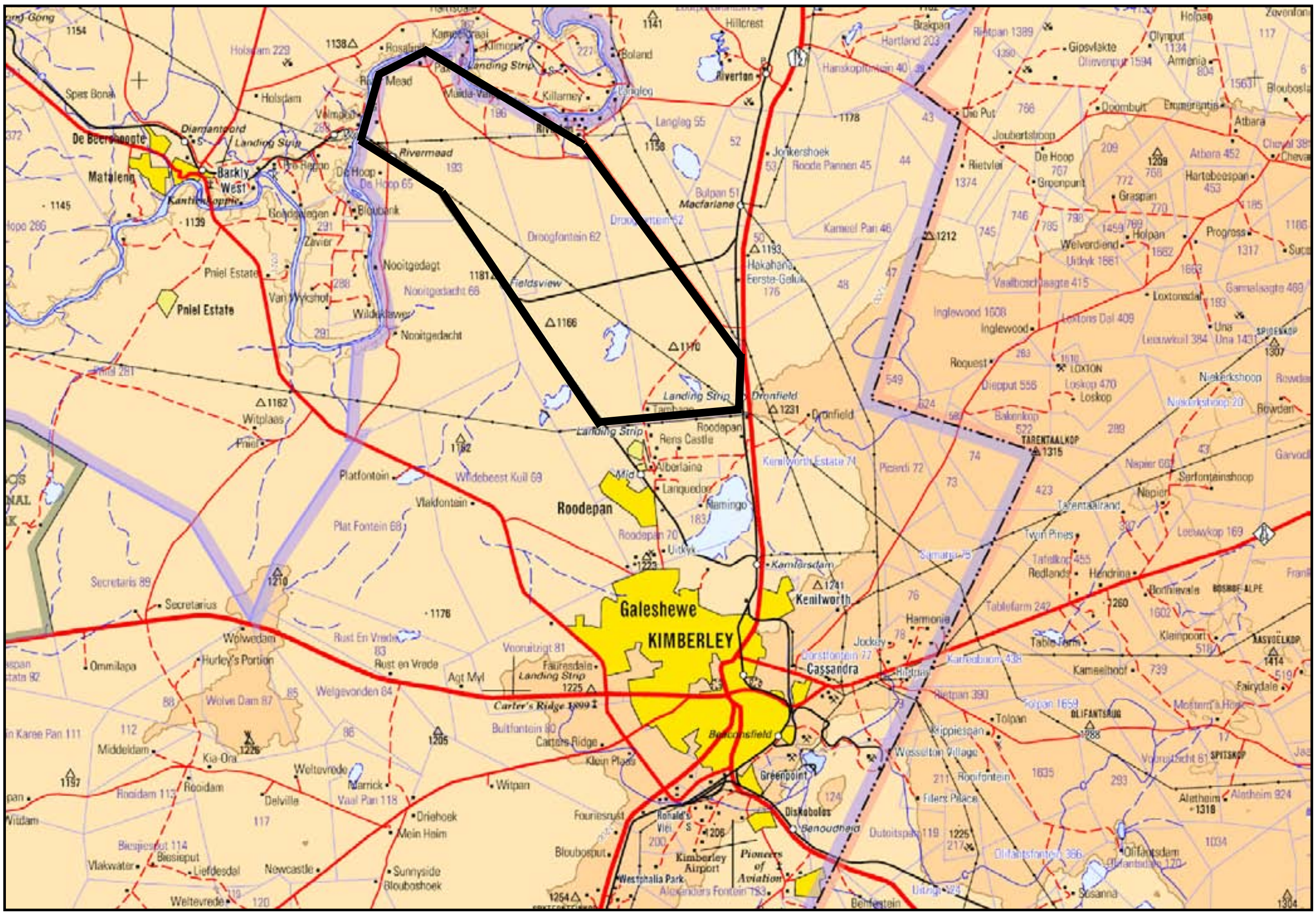

Fig. 1. Extract from 1: 250 000 topographical map 2824 Kimberley (Courtesy of the Chief Directorate of Surveys & Mapping, Mowbray) showing approximate location of the proposed Droogfontein Solar PV project *c*. 10-15 km north of Kimberley, Northern Cape Province (black polygon). See also satellite image in Fig. 2.

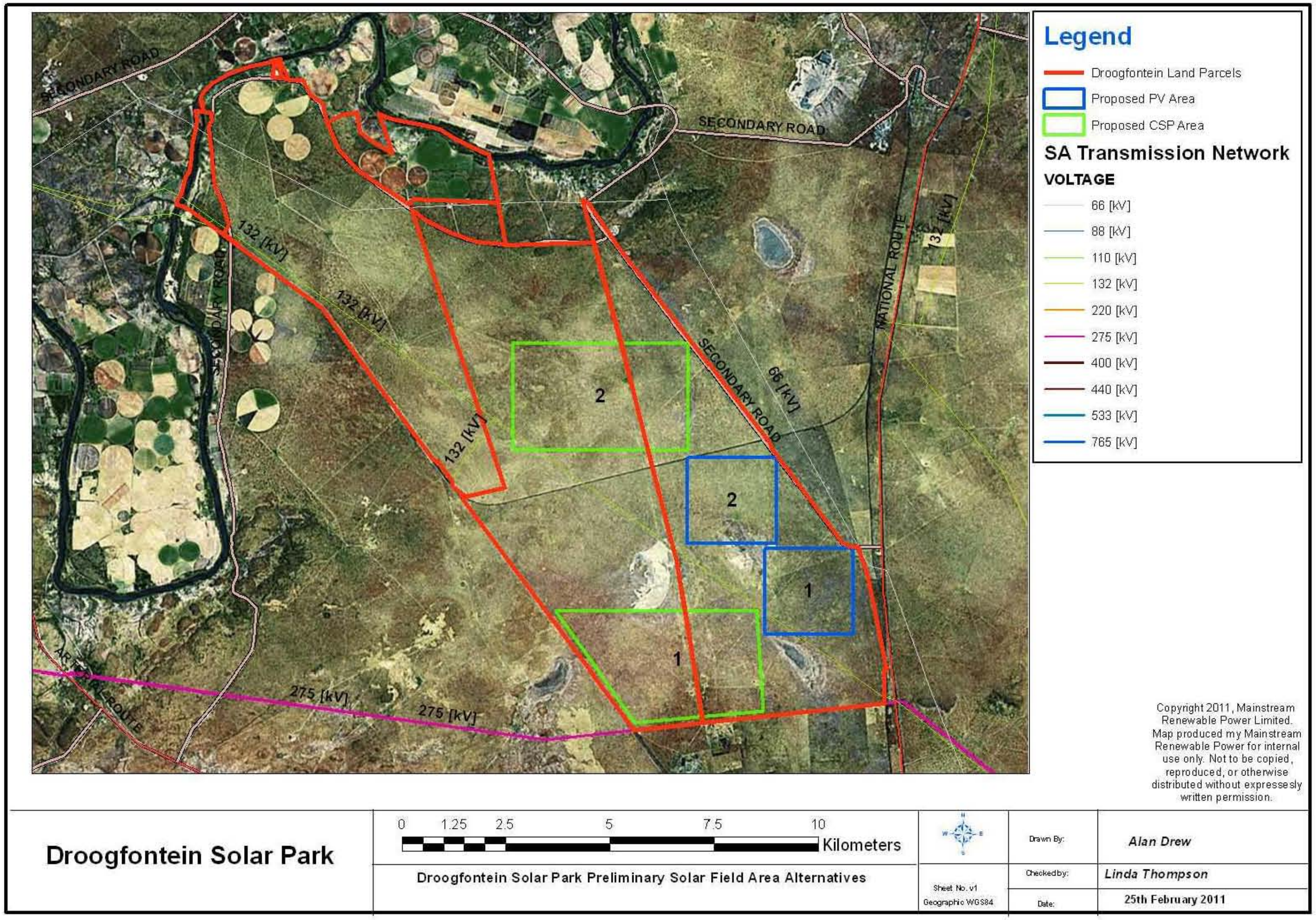

Fig. 2.Satellite image of the proposed Droogfontein Solar Park north of Kimberley (Image provided by Mainstream renewable Power, Engineering & Construction).

2.2. General approach used for palaeontological desktop studies

In preparing a palaeontological desktop study the potentially fossiliferous rock units (groups, formations *etc*) represented within the study area are determined from geological maps. The known fossil heritage within each rock unit is inventoried from the published scientific literature, previous palaeontological impact studies in the same region, and the author"s field experience (Consultation with professional colleagues as well as examination of institutional fossil collections may play a role here, or later during the compilation of the final report). This data is then used to assess the palaeontological sensitivity of each rock unit to development (Provisional tabulations of palaeontological sensitivity of all formations in the Western, Eastern and Northern Cape have already been compiled by J. Almond and colleagues; *e.g.* Almond &Pether 2008). The likely impact of the proposed development on local fossil heritage is then determined on the basis of (1) the palaeontological sensitivity of the rock units concerned and (2) the nature of the development itself, most notably the extent of fresh bedrock excavation envisaged.

When rock units of moderate to high palaeontological sensitivity are present within the development footprint, a field-based study by a professional palaeontologist is usually warranted. Most detrimental impacts on palaeontological heritage occur during the construction phase when fossils may be disturbed, destroyed or permanently sealed-in during excavations and subsequent construction activity. Where specialist palaeontological mitigation is recommended, this may take place before construction starts or, most effectively, during the construction phase while fresh, portentially fossiliferous bedrock is still exposed for study. Mitigation usually involves the judicious sampling, collection and recording of fossils as well as of relevant contextual data concerning the surrounding sedimentary matrix. It should be emphasised that, *provided* appropriate mitigation is carried out, many developments involving bedrock excavation actually have a *positive* impact on our understanding of local palaeontological heritage. Constructive collaboration between palaeontologists and developers should therefore be the expected norm

3. GEOLOGICAL BACKGROUND

The geology of the study area north of Kimberley is shown on the 1: 250 000 geology map 2824 Kimberley (Council for Geoscience, Pretoria; Fig. 4 herein). An explanation for the Kimberley geological map has been published by Bosch (1993).

The Droogfontein study area is occupied by flat-lying terrain (gradients less than 3°) at 1100-1200m amsl on the southern side of the Vaal River (Fig. 2). The central portion of the area features several small inliers of basement rocks mapped as the **Allanridge Formation** (**Ra**) of the **VenterdorpSupergroup**. This Late Archaean succession is almost entirely composed of resistant-weathering, dark green lavas and associated pyroclastic rocks that are dated to 2.7 Ga (Bosch 1993, Van der Westhuizen& De Bruiyn 2006 and refs. therein). Thin lenses of cross-bedded quartzite and conglomerate are recorded just above the base of the succession by Bosch (1993). Since these ancient basement rocks are not known to be fossiliferous, however, they will not be considered further here. Conical stromatolites are recorded from the underlying Bothaville Formation.

Small inliers of laminated basinalmudrocks of the **Prince Albert Formation** (EccaGroup)(**Ppr**) are mapped in the northeastern and southern sectors of the study area. This unit of Early Permian (Asselian / Artinskian) age was previously known as "Upper DwykaShales" and reaches a thickness of 90m in the Kimberley area (Bosch 1993). Useful recent geological accounts of the Ecca Group are given by Johnson *et al.* (2006) and Johnson (2009). Key reviews of the Prince Albert Formation are given by Visser (1992) and Cole (2005). The Prince Albert Formation in the Kimberley - Britstown area consists predominantly of dark, well-laminated basinalmudrocks (shales, siltstones) that are sometimes carbonaceous or pyritic and typically contain a variety of diagenetic concretions enriched in iron and carbonate minerals (McLachlan & Anderson 1973, Visser *et al.* 1977-78, Zawada 1992, Bosch 1993). Some of these carbonate concretions are richly fossilferous (See Section 4.1 below). Much of the Ecca shale outcrop has been modified by surface calcretization (Zawada 1992). Palaeontologically important exposures in incised river banks near Douglas, to the west of Kimberley, are described by McLachlan and Anderson (1973). The Ecca beds here are mantled with a thin veneer (*c*. 3m) of intrusive dolerite, Quaternary calcrete and reddish Kalahari sands (= Gordonia Formation). They mainly comprise shales with a band of ferruginous carbonate as well as a 6m-thick zone of fossiliferous calcareous concretions that lies 9m above the base of the formation.

The great majority of the Droogfontein study site is mantled by superficial deposits of Quaternary to Recent age, especially Pleistocene aeolian (wind-blown) sands of the **Gordonia Formation** (**Kalahari Group**) (**Qs**). The geology of the Late Cretaceous to Recent Kalahari Group is reviewed by Thomas (1981), Dingle *et al.* (1983), Thomas & Shaw 1991, Haddon (2000) and Partridge *et al.* (2006). The Gordonia dune sands are considered to range in age from the Late Pliocene / Early Pleistocene to Recent, dated in part from enclosed Middle to Later Stone Age stone tools (Dingle *et al*., 1983, p. 291). Note that the recent extension of the Pliocene - Pleistocene boundary from 1.8Ma back to 2.588 Ma would place the Gordonia Formation almost entirely within the Pleistocene Epoch. At the latitude of the Kimberley study site (28° 30"S) Gordonia Formation sands less than 30m thick are likely to be the main or perhaps the only Kalahari sediments present (*cf*isopach map of the Kalahari Group, fig. 6 *in* Partridge *et al*., 2006). These unconsolidated sands *might* be locally underlain by thin surface gravels equivalent to the **Obobogorop Formation**, as well as by pebbly calcretes of Plio-Pleistocene age or younger (**Mokalanen Formation**; Fig. 5. Field photos of test pits in the geotechnical report for Droogfontein (Anon, Mainstream Renewable Power, 2011) show a thin topsoil underlain by pale to orange-brown Kalahari sands to depths of 2.3m or more over a large area of the site (Fig. 3). The sands are unconsolidated near-surface but below 2.5m depth may be secondarily cemented with whitish calcrete. Occasional bouldery and gravelly horizons were also encountered.

Fig. 3. Field photos from the geotechnical report for the Droogfontein development site showing deep orange-hued Kalahari sands (LHS) with pale calcrete at depths of c. 2.5m in some trial pits (Mainstream Renewable Power, 2011).

Relict patches of elevated Late Tertiary to Quaternary **alluvial gravels** ("High Level Gravels") are mapped along both the Vaal and Orange Rivers in the Windsorton – Kimberley – Douglas - Prieska area, where they have been associated with diamond mining (De Wit *et al*., 2000, their table 4.1 and fig. 4.1). These gravels are not mapped within the Droogfontein study area on geology sheet 2824 Kimberley. However, "Older Gravels" do occur on farm Nooigedacht 66 just to the west of

Droogfontein (Qa / DA in Fig. 4; Engelbrecht 1963, Bosch 1993 p. 37) and later occurrences ("Youngest Gravels" of Bosch 1993, p. 38) may be present along the banks of the Vaal River. These possible younger gravels will not be directly impacted by the proposed solar park development, however. In the Windsorton area to the north of Kimberley heavily calcretized "Older Gravels" have been grouped into the **Windsorton Formation** and are suspected to be Miocene-Pliocene in age (Partridge & Brink 1967, De Wit *et a*l., 2000, Partridge *et al.* 2006). The "Younger Gravels" (**Rietputs Formation**) of the Vaal River system, at lower elevations, are associated with Acheulian stone tools and are therefore considered to be Early to Middle Pleistocene (Cornelian) in age (Klein 1984, Table 2, Butzer*et al*., 1973, Partridge *et al*., 2006). Recent cosmogenic nuclide dating of coarse gravels and sands in the Rietputs Formation gave an age of *c.* 1.57 Ma (Gibbon *et al.,* 2009).

Small patches of **calcretes** (pedogeniclimestones) (Qc) are mapped along the eastern edge as well as in the south of the Droogfontein study area. The latter appear to be associated with Karoo sediments of the Prince Albert Formation but may also represent calcretized wind-blown sands blown southeastwards out from several small pans in this region (Bosch 1993). Extensive calcretes overlying the Karoo Supergroup and older basement rocks in the Douglas area to the WSW of Kimberley, forming a broad band either side of the Orange River, may be, at least in part, stratigraphically equivalent to the **Mokalanen Formation** of the Kalahari Group (Fig. 5). According to Zawada (1992) calcretes are especially well developed overlying the Ecca Group outcrop in the Koffiefontein sheet area to the east of Douglas. The commonest type in this region are the so-called Second Intermediate Calcretes that contain Middle Stone Age tools dated between *c*. 300 000 and 50 000 years, indicating a Pleistocene age (Note that Partridge *et al*., 2006, suggest an older, Late Pliocene, age for the Mokalanen Formation proper). Older calcretes are associated with calcified alluvial gravels (see below), and younger ones form hard pans adjacent to extant pans (Potgieter 1974, Partridge & Scott 2000). The thickness of these surface calcretes is not specified, but is unlikely to exceed a few meters in most areas.

While Early Jurassic (183 Ma) **Karoo dolerite intrusions** (Jd) are not mapped within the study area itself, the Ecca rocks here have probably been thermally and chemically modified by nearby intrusions. **Kimberlite pipes** and **fissures** dated to 77-120 Maare mapped in the study area where they intrude the VentersdorpSupergroup lavas (diamond symbols in Fig. 4; Bosch 1993 Table 8.1, Skinner &Truswell 2006). These Early Jurassic to Early Cretaceous igneous rocks do not contain fossils. However, where the associated crater-lake sediments are preserved beneath cover sands they sometimes prove to be highly fossiliferous, as seen in examples from Bushmanland (*e.g.* Scholtz 1985, Smith 1986a, 1986b, 1988, 1995).

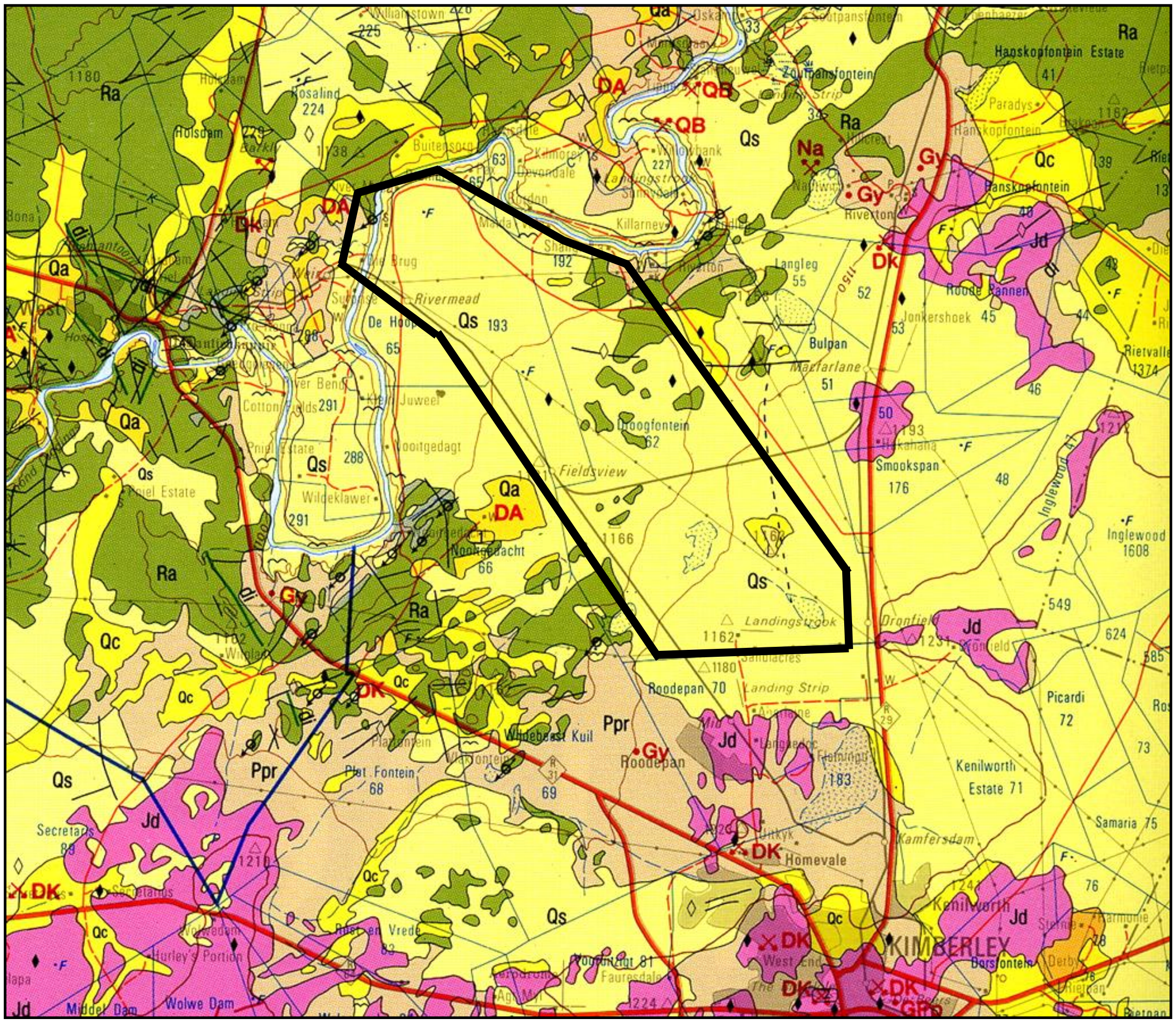

Fig. 4. Extract from the 1: 250 000 geological map 2824 Kimberley (Council for Geoscience, Pretoria) showing approximate location of proposed Droogfontein Solar Park (black polygon).

The main geological units represented in the study region include:

Ra (green) = Allanridge Formation (Platberg Group, VentersdorpSupergroup)
Ppr (buff) = Prince Albert Formation (Ecca Group)
Jd (pink) = Karoo Dolerite Suite

Qs (pale yellow) = aeolian dune sands (Gordonia Formation, Kalahari Group)
Qc (medium yellow) = surface calcrete, calcified pan dunes
Qa (dark yellow) = ancient alluvial gravels ("High Level Gravels")

Open and solid diamond symbols = kimberlite fissures and pipes respectively

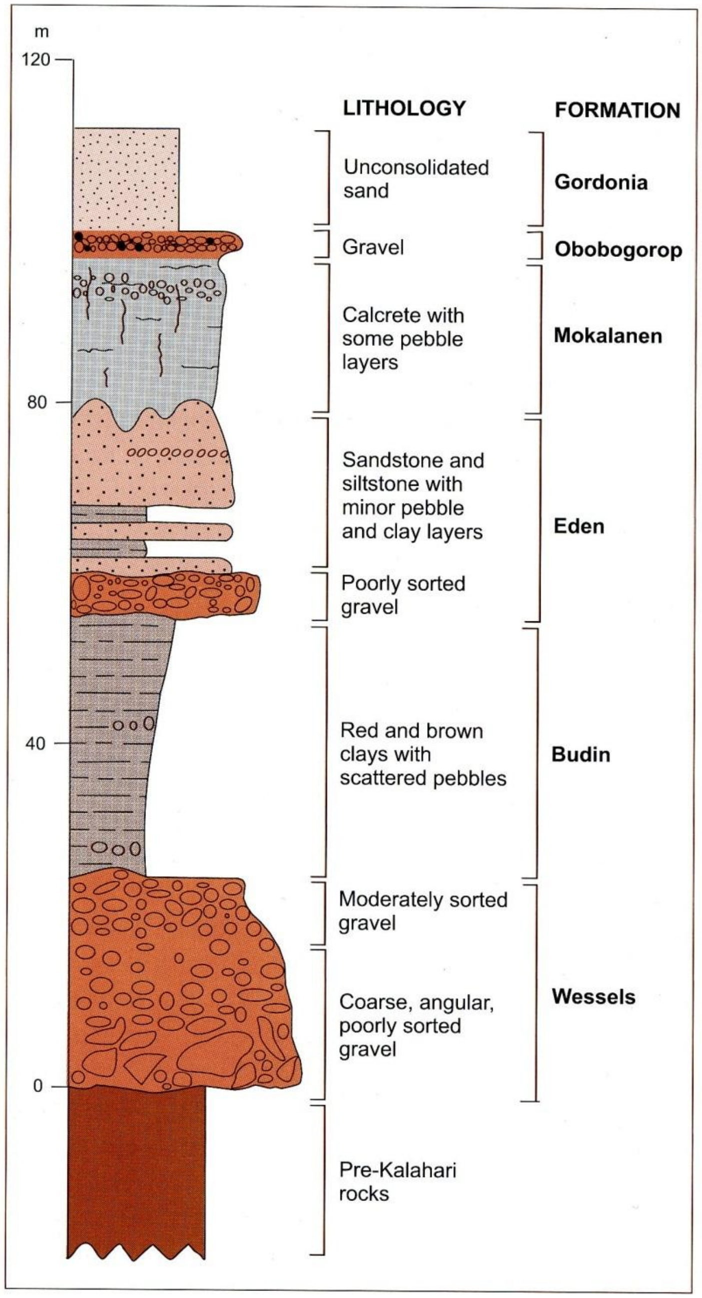

Fig. 5.Stratigraphy of the Kalahari Group (From Partridge *et al.,* 2006). Aeolian sands of the Gordonia Formation as well as calcretesb *possibly* equivalent to the Mokalanen Formation are represented in the study area.

4. PALAEONTOLOGICAL HERITAGE

The fossil heritage recorded within each of the main sedimentary rock successions represented within the Droogfontein study region north of Kimberley is outlined here. See also the summary of fossil heritage provided in Table 1 below.

4.1. Fossils within the Prince Albert Formation

The fossil biota of the post-Dwykamudrocks of the Prince Albert Formation is summarized by Cole (2005) and Almond (2008a, b). Epichnial (bedding plane) trace fossil assemblages of the non-marine *Mermia*Ichnofacies, dominated by the ichnogenera*Umfolozia* (arthropod trackways) and *Undichna* (fish swimming trails), are commonly found in basinalmudrockfacies of the Prince Albert Formation throughout the Ecca Basin. These assemblages have been described by Anderson (1974, 1975, 1976, 1981) and briefly reviewed by Almond (2008a, b). A small range of simple, horizontal to oblique endichnial burrows forming dense monospecificichnoassemblages have been recorded from the Ceres Karoo, especially from those parts of the Prince Albert succession containing thin volcanic tuffs (Almond 2010). The presence of more diverse, but incompletely recorded, benthic invertebrate fauna in the Early Permian Ecca Sea is suggested by the recent discovery of complex arthropod trails with paired drag marks in the Prince Albert Formation near Matjiesfontein in the southern Great Karoo.Thesetrackways might have been generated by small eurypterids (water scorpions), but this requires further confirmation. Pooly-defined invertebrate burrows are recorded from the Prince Albert Formation in the Kimberley sheet area by Bosch (1993).

Diagenetic nodules containing the remains of palaeoniscoids (primitive bony fish), sharks, spiral bromalites (coprolites, spiral gut infills*etc* attributable to sharks or temnospondyl amphibians) and petrified wood have been found in the Ceres Karoo (Almond 2008b and refs. therein). Rare shark remains (*Dwykaselachus*) are recorded near Prince Albert on the southern margin of the Great Karoo (Oelofsen 1986). Microfossil remains in this formation include sponge spicules, foraminiferal and radiolarian protozoans, acritarchs and miospores.

The most diverse, as well as biostratigraphically, palaeobiogeographically and palaeoecologically interesting, fossil biota from the Prince Albert Formation is that described from calcareous concretions exposed along the Vaal River in the Douglas area to the west of KImberley (McLachlan and Anderson 1973, Visser *et al.,* 1977-78). The important Douglas biota contains petrified wood (including large tree trunks), palynomorphs (miospores), orthoconenautiloids, nuculid bivalves, articulate brachiopods, spiral and other “coprolites” (probably of fish, possibly including sharks) and fairly abundant, well-articulated remains of palaeoniscoid fish. Most of the fish have been assigned to the palaeoniscoid genus *Namaichthys* but additional taxa, including a possible acrolepid, may also be present here (Evans 2005). The invertebrates are mainly preserved as moulds.

4.3. Fossils within the superficial deposits

The fossil record of the **Kalahari Group** is generally sparse and low in diversity. The **Gordonia Formation** dune sands were mainly active during cold, drier intervals of the Pleistocene Epoch that were inimical to most forms of life, apart from hardy, desert-adapted species. Porous dune sands are not generally conducive to fossil preservation. However, mummification of soft tissues may play a role here and migrating lime-rich groundwaters derived from the underlying bedrocks (including, for example, dolerite) may lead to the rapid calcretisation of organic structures such as burrows and root casts. Occasional terrestrial fossil remains that might be expected within this unit include calcretizedrhizoliths (root casts) and termitaria (*e.g. Hodotermes*, the harvester termite), ostrich egg shells (*Struthio*) and shells of land snails (*e.g. Trigonephrus*) (Almond 2008a, Almond &Pether 2008). Other fossil groups such as freshwater bivalves and gastropods (*e.g. Corbula, Unio*) and snails, ostracods (seed shrimps),charophytes (stonewort algae), diatoms (microscopic algae within siliceous shells) and stromatolites (laminated microbial limestones) are associated with local watercourses and pans. Microfossils such as diatoms may be blown by wind into nearby dune sands (Du Toit 1954, Dingle *et al*., 1983). These Kalahari fossils (or subfossils) can be expected to occur sporadically but widely, and the overall palaeontological sensitivity of the Gordonia Formation is therefore considered to be low. Underlying calcretes might also contain trace fossils such as rhizoliths, termite and other insect burrows, or even mammalian trackways. Mammalian bones, teeth and horn cores (also tortoise remains, and fish, amphibian or even crocodiles in wetter depositional settings such as pans) may be expected occasionally expected within Kalahari Group sediments and calcretes, notably those associated with ancient alluvial gravels.

The “Older” Vaal River Gravels (**Windsorton Formation**) of possible Miocene-Pliocene age have not yet yielded well-dated fossil biotas (Partridge *et al.,* 2006). A ”sparse, poorly provenanced vertebrate fauna from diamond diggings” is noted herein by De Wit *et al.* (2000) who favour a Pliocene age (4.5-3.5 Ma). In contrast, a wide range of Pleistocene mammal remains (bones, teeth) as well as Acheulian stone tools are recorded from the “Younger” Vaal River Gravels or **Rietputs Formation** (Cooke 1949, Wells 1964, Partridge & Brink 1967, Butzer et al. 1973, Helgren 1977, Klein 1984, Bosch 1993). These are assigned to the Mid Pleistocene Cornelian Mammal Age and include various equids and artiodactyls as well as African elephant and hippopotamus (See MacRae 1990, De Wit 2008 for brief reviews, and Gibbon *et al.* 2009 for recent dating of the matrix).

5. SIGNIFICANCE OF IMPACTS ON PALAEONTOLOGICAL HERITAGE

A brief assessment of the significance of the impact of the Droogfontein solar park development on local fossil heritage resources is presented here.

- **Nature of the impact**

Bedrock excavations for the proposed PV panel and CSP mirror supports, buildings, buried cables and pipelines, electrical substation and monitoring station as well as the access and internal site roads, drainage channels, evaporation ponds and powerline infrastructure may adversely affect potential fossil heritage within the study area by destroying, disturbing or permanently sealing-in fossils that are then no longer available for scientific research or other public good. In such flat terrain lay down areas are unlikely to involve bedrock excavation. It is currently unclear if exploitation of potentially fossiliferous bedrock from new or existing borrow pits will be necessary.

- **Extent and duration of the impact**

Significant impacts on fossil heritage are limited to the construction phase when excavations into fresh, potentially fossiliferous bedrock may take place. No further significant impacts are anticipated during the operational phase of the Droogfontein development.

- **Probability of the impact occurring**

Given that the potentially fossiliferous Ecca Group bedrock within the study area is (a) extensively mantled in fossil-poor superficial deposits (*e.g.* Kalahari sands, calcrete), (b) often highly weathered and (c) possibly baked by subsurface dolerite intrusions, while large scale bedrock excavations are not envisaged for this project, a significant impact on palaeontological heritage is considered unlikely.

- **Degree to which the impact can be reversed**

Impacts on fossil heritage are generally irreversible. Well-documented new records of fossils represent a positive impact from a scientific viewpoint.

- **Degree to which the impact may cause irreplaceable loss of resources**

Well-preserved and locally abundant fossils from the Prince Albert Formation, which is present beneath a substantial part of the Droogfontein study area, are already well-known from good rock exposures along the Vaal River in the neighbourhood of Douglas c. 100km to the southwest. In contrast, the Prince Albert bedrocks at Droogfontein are mostly buried beneath several meters of very sparsely fossiliferous Kalahari sands and may well be baked by dolerite intrusion or deeply weathered. The proposed development therefore does not pose a serious threat to local or regional fossil heritage and its impact is therefore rated as of *low significance* in palaeontological terms.

- **Degree to which the impact can be mitigated**

Specialist palaeontological mitigation is *not* regarded as warranted for this project. Should significant fossil remains be exposed during the construction phase of the development, these should be safeguarded, preferably *in situ*, by the ECO and reported to Heritage Western Cape so that appropriate mitigation measures can be considered.

- **Cumulative impacts**

Cumulative impacts cannot be assessed in the absence of reliable data on other development projects approved or proposed in the study region.

6. CONCLUSIONS & RECOMMENDATIONS

The proposed Droogfontein PV and CSP solar plant is underlain at depth by ancient Precambrian lavas of the VentersdorpSupergroup (Allanridge Formation) of Late Archaean age (*c.* 2.7 billion years old) as well as by Early Permian mudrocks of the Ecca Group (Prince Albert Formation). Highly fossiliferous exposures of the last unit are known along the Vaal River at Douglas, *c.* 100km to the south-west. However, at Droogfontein the Prince Albert sediments are almost entirely mantled by several meters of aeolian sands of the Kalahari Group (Gordonia Formation) that are of low palaeontological sensitivity, as are also the associated calcretes. Potentially fossiliferous, fresh (unweathered) Prince Albert rocks are therefore unlikely to be intersected by excavations during construction. Ancient alluvial gravels of the Windsorton Formation are mapped just to the west of the study area but not on Droogfontein itself. Fossiliferous younger gravels may well occur along the banks of the Vaal River here, but are unlikely to be directly affected by the proposed solarparkdevelopment. The overall impact of the proposed development on local fossil heritage is considered to be *low* and specialist palaeontological mitigation for this project is not considered necessary.

Should substantial fossil remains be exposed during construction, however, such as well-preserved fossil fish, reptiles or petrified wood, the ECO should safeguard these, preferably *in situ*, and alert SAHRA as soon as possible so that appropriate action (*e.g.* recording, sampling or collection) can be taken by a professional palaeontologist.

7. ACKNOWLEDGEMENTS

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TABLE 1: SUMMARY OF FOSSIL HERITAGE IN THE KIMBERLEY AREA				
GEOLOGICAL UNIT	**ROCK TYPES & AGE**	**FOSSIL HERITAGE**	**PALAEONT-OLOGICAL SENSITIVITY**	**RECOMMENDED MITIGATION**
Gordonia Formation *etc* KALAHARI GROUP	unconsolidated to semi-consolidated aeolian sands, locally calcretized at depth QUATERNARY	calcretisedrhizoliths&termitaria, ostrich egg shells, land snail shells, rare mammalian and reptile (*e.g.* tortoise) bones, teeth freshwater units associated with diatoms, molluscs, stromatolites*etc*	LOW	none recommended any substantial fossil finds to be reported by ECO to SAHRA
Prince Albert Formation ECCA GROUP	basinalmudrocks with carbonate &phosphatic concretions, minor tuffs EARLY PERMIAN	marine invertebrates (esp. molluscs, brachiopods), coprolites, palaeoniscoid fish & sharks, trace fossils, various microfossils, petrified wood	LOW IN THIS AREA	none recommended any substantial fossil finds to be reported by ECO to SAHRA
Allanridge Formation VENTERSDORP SUPERGROUP	lavas and pyroclastics with minor siliciclastic lenses LATE ARCHAEAN (c. 2.7 Ga)	none	INSENSITIVE	none recommended stromatolites recorded from sediments of underlying Bothaville Formation

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QUALIFICATIONS & EXPERIENCE OF THE AUTHOR

Dr John Almond has an Honours Degree in Natural Sciences (Zoology) as well as a PhD in Palaeontology from the University of Cambridge, UK. He has been awarded post-doctoral research fellowships at Cambridge University and in Germany, and has carried out palaeontological research in Europe, North America, the Middle East as well as North and South Africa. For eight years he was a scientific officer (palaeontologist) for the Geological Survey / Council for Geoscience in the RSA. His current palaeontological research focuses on fossil record of the Precambrian - Cambrian boundary and the Cape Supergroup of South Africa. He has recently written palaeontological reviews for several 1: 250 000 geological maps published by the Council for Geoscience and has contributed educational material on fossils and evolution for new school textbooks in the RSA.

Since 2002 Dr Almond has also carried out palaeontological impact assessments for developments and conservation areas in the Western, Eastern and Northern Cape under the aegis of his Cape Town-based company *Natura Viva* cc. He is a long-standing member of the Archaeology, Palaeontology and Meteorites Committee for Heritage Western Cape (HWC) and an advisor on palaeontological conservation and management issues for the Palaeontological Society of South Africa (PSSA), HWC and SAHRA. He is currently compiling technical reports on the provincial palaeontological heritage of Western, Northern and Eastern Cape for SAHRA and HWC. Dr Almond is an accredited member of PSSA and APHAP (Association of Professional Heritage Assessment Practitioners – Western Cape).

Declaration of Independence

I, John E. Almond, declare that I am an independent consultant and have no business, financial, personal or other interest in the proposed development project, application or appeal in respect of which I was appointed other than fair remuneration for work performed in connection with the activity, application or appeal. There are no circumstances that compromise the objectivity of my performing such work.

John E. Almond

Dr John E. Almond
Palaeontologist
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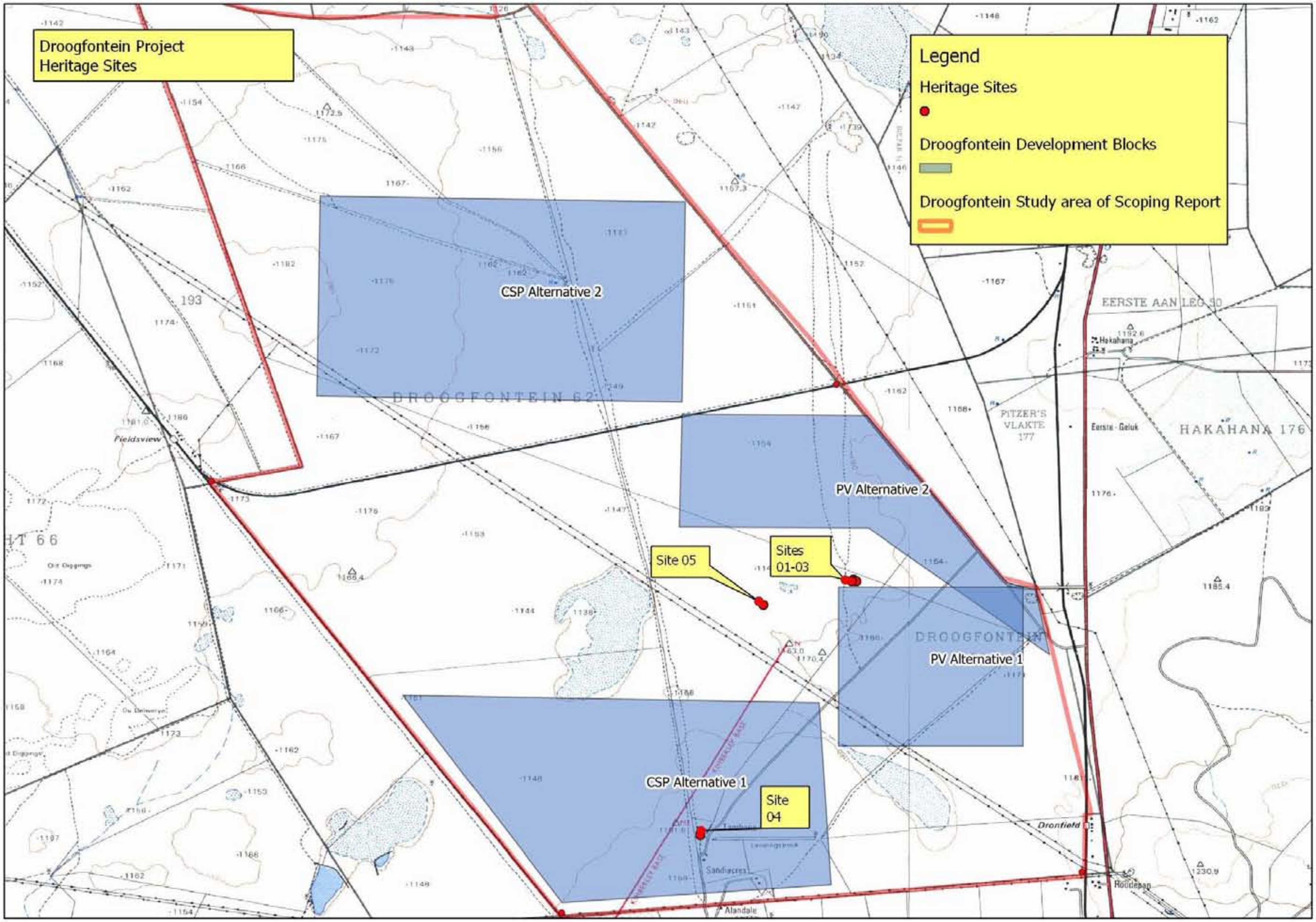
Appendix B

MAP OF HERITAGE SITE RELATIVE TO DEVELOPMENT AREAS


Droogfontein Project
Heritage Sites
Legend
Heritage Sites
Droogfontein Development Blocks
Droogfontein Study area of Scoping Report
CSP Alternative 2
CSP Alternative 1
PV Alternative 2
PV Alternative 1
Site 05
Sites 01-03
Site 04
DROOGFONTEIN 62
EERSTE AAN LEG 30
HAKAHANA 176
PITZER'S VLAKTE 177
Fieldsview
Dronfield
Roodepan
Alandale
Sandiacres