

ARCHAEOLOGICAL IMPACT ASSESSMENT

FOR THE PROPOSED ESTABLISHMENT OF THE MAJUBA SOLAR PV FACILITY, MPUMALANGA PROVINCE

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Project Reference:




215092

Report date:

September 2015

DOCUMENT PROGRESS
Archaeological Impact Assessment

Document status

Document Version	v1.0		
Report Purpose	Draft for review Savannah (Pty) Ltd		
Report Ref. No.	215092		
	Name	Signature	Date
Mapping	Mr. J. Van der Walt		September 2015
Document Compilation	Mr. J. van der Walt		September 2015
Field Assessment	Mr. J. van der Walt		February 2015

Date	Report Reference number	Description of amendment
2015/10/24	215093	Review – Eskom Amendments

Distribution List

Date	Report Reference number	Document Distribution	Number of Copies
2015/09/12	215092	Savannah (Pty) Ltd	Electronic copy

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EXECUTIVE SUMMARY

Site name and location: The Majuba Solar PV Facility is located Portion 1, 2 and 6 of the farm Witkoppies 81 HS, Mpumalanga Province

1: 50 000 Topographic Map: 2729BB

EIA Consultant: Savannah Environmental (Pty) Ltd.

Developer Eskom Holdings (SOC) Limited

Heritage Consultant: Heritage Contracts and Archaeological Consulting CC (HCAC).

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Date of Report: 12 September 2015

Findings of the Assessment:

The study area was assessed in terms of the archaeological component of Section 35 of the NHRA. During the survey no surface indicators of archaeological (Stone or Iron Age) material was identified in the study area. No standing structures over 60 years old, sites of cultural significance associated with burial grounds and graves, and significant cultural landscapes or viewsapes were recorded.

Based on the results of the field survey of the proposed Majuba PV facility there are no significant archaeological risks associated with the development and from an archaeological point of view there is no reason why the development should not proceed if the recommendations as made in the report are adhered to and based on approval from SAHRA.

General

Due to the subsurface nature of archaeological material and unmarked graves, the possibility of the occurrence of such finds cannot be excluded. If during construction any possible finds such as stone tool scatters, artefacts or bone and fossil remains are made, the operations must be stopped and a qualified archaeologist must be contacted for an assessment of the find/s.

Disclaimer: *Although all possible care is taken to identify sites of cultural importance during the investigation of study areas, it is always possible that hidden or sub-surface sites could be overlooked during the study. Heritage Contracts and Archaeological Consulting CC and its personnel will not be held liable for such oversights or for costs incurred as a result of such oversights.*

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ABBREVIATIONS

AIA: Archaeological Impact Assessment
ASAPA: Association of South African Professional Archaeologists
BIA: Basic Impact Assessment
CRM: Cultural Resource Management
ECO: Environmental Control Officer
EIA: Environmental Impact Assessment*
EIA: Early Iron Age*
EIA Practitioner: Environmental Impact Assessment Practitioner
EMP: Environmental Management Plan
ESA: Early Stone Age
GPS: Global Positioning System
HIA: Heritage Impact Assessment
LIA: Late Iron Age
LSA: Late Stone Age
MEC: Member of the Executive Council
MIA: Middle Iron Age
MPRDA: Mineral and Petroleum Resources Development Act
MSA: Middle Stone Age
NEMA: National Environmental Management Act
PRHA: Provincial Heritage Resource Agency
SADC: Southern African Development Community
SAHRA: South African Heritage Resources Agency

**Although EIA refers to both Environmental Impact Assessment and the Early Iron Age both are internationally accepted abbreviations and must be read and interpreted in the context it is used.*

GLOSSARY

Archaeological site (remains of human activity over 100 years old)

Early Stone Age (~ 2.6 million to 250 000 years ago)

Middle Stone Age (~ 250 000 to 40-25 000 years ago)

Later Stone Age (~ 40-25 000, to recently, 100 years ago)

The Iron Age (~ AD 400 to 1840)

Historic (~ AD 1840 to 1950)

Historic building (over 60 years old)

1 BACKGROUND INFORMATION

Heritage Contracts and Archaeological Consulting CC (HCAC) was appointed to conduct an Archaeological Impact Assessment for the proposed Majuba PV project.

The aim of the study is to identify cultural heritage sites, document, and assess their importance within local, provincial and national context. It serves to assess the impact of the proposed project on non-renewable heritage resources, and to submit appropriate recommendations with regard to the responsible cultural resources management measures that might be required to assist the developer in managing the discovered heritage resources in a responsible manner. It is also conducted to protect, preserve, and develop such resources within the framework provided by the National Heritage Resources Act of 1999 (Act 25 of 1999).

The report outlines the approach and methodology utilized before and during the survey, which includes: Phase 1, a desktop study (van der Walt 2014) that includes collection from various sources and consultations; Phase 2, the physical surveying of the study area on foot and by vehicle; Phase 3, reporting the outcome of the study.

General site conditions and features on sites were recorded by means of photographs, GPS locations, and site descriptions. Possible impacts were identified and mitigation measures are proposed in the following report.

This report must also be submitted to the SAHRA for review.

1.1. Terms of Reference

Desktop study

Conduct a brief desktop study where information on the area is collected to provide a background setting of the archaeology that can be expected in the area.

Field study

Conduct a field study to: a) systematically survey the proposed project area to locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest; b) record GPS points identified as significant areas; c) determine the levels of significance of the various types of heritage resources recorded in the project area.

Reporting

Report on the identification of anticipated and cumulative impacts the operational units of the proposed project activity may have on the identified heritage resources for all 3 phases of the project; i.e., construction, operation and decommissioning phases. Consider alternatives, should any significant sites be impacted adversely by the proposed project. Ensure that all studies and results comply with Heritage legislation and the code of ethics and guidelines of ASAPA.

To assist the developer in managing the discovered heritage resources in a responsible manner, and to protect, preserve, and develop them within the framework provided by the National Heritage Resources Act of 1999 (Act 25 of 1999).

1.2. Archaeological Legislation and Best Practice

Phase 1, an AIA or a HIA is a pre-requisite for development in South Africa as prescribed by SAHRA and stipulated by legislation. The overall purpose of a heritage specialist input is to:

- » Identify any heritage resources, which may be affected;
- » Assess the nature and degree of significance of such resources;
- » Establish heritage informants/constraints to guide the development process through establishing thresholds of impact significance;
- » Assess the negative and positive impact of the development on these resources;
- » Make recommendations for the appropriate heritage management of these impacts.

The AIA or HIA, as a specialist sub-section of the EIA, is required under the National Heritage Resources Act NHRA of 1999 (Act 25 of 1999), Section 23(2) (b) of the NEMA and section S.39 (3) (b) (iii) of the MPRDA.

The AIA should be submitted, as part of the EIA, BIA or EMP, to the PHRA if established in the province or to SAHRA. SAHRA will be ultimately responsible for the professional evaluation of Phase 1 AIA reports upon which review comments will be issued. 'Best

practice' requires Phase 1 AIA reports and additional development information, as per the EIA, BIA/EMP, to be submitted in duplicate to SAHRA after completion of the study. SAHRA accepts Phase 1 AIA reports authored by professional archaeologists, accredited with ASAPA or with a proven ability to do archaeological work.

Minimum accreditation requirements include an Honours degree in archaeology or related discipline and 3 years post-university CRM experience (field supervisor level).

Minimum standards for reports, site documentation and descriptions are set by ASAPA in collaboration with SAHRA. ASAPA is based in South Africa, representing professional archaeology in the SADC region. ASAPA is primarily involved in the overseeing of ethical practice and standards regarding the archaeological profession. Membership is based on proposal and secondment by other professional members.

Phase 1 AIA's are primarily concerned with the location and identification of sites situated within a proposed development area. Identified sites should be assessed according to their significance. Relevant conservation or Phase 2 mitigation recommendations should be made. Recommendations are subject to evaluation by SAHRA.

Conservation or Phase 2 mitigation recommendations, as approved by SAHRA, are to be used as guidelines in the developer's decision making process.

Phase 2 archaeological projects are primarily based on salvage/mitigation excavations preceding development destruction or impact on a site. Phase 2 excavations can only be conducted with a permit, issued by SAHRA to the appointed archaeologist. Permit conditions are prescribed by SAHRA and includes (as minimum requirements) reporting back strategies to SAHRA and deposition of excavated material at an accredited repository.

In the event of a site conservation option being preferred by the developer, a site management plan, prepared by a professional archaeologist and approved by SAHRA, will suffice as minimum requirement.

After mitigation of a site, a destruction permit must be applied for from SAHRA by the client before development may proceed.

Human remains older than 60 years are protected by the National Heritage Resources Act, with reference to Section 36. Graves older than 60 years, but younger than 100 years fall under Section 36 of Act 25 of 1999 (National Heritage Resources Act), as well as the Human Tissues Act (Act 65 of 1983), and are the jurisdiction of SAHRA. The procedure for Consultation Regarding Burial Grounds and Graves (Section 36[5]) of Act 25 of 1999) is applicable to graves older than 60 years that are situated outside a formal cemetery administrated by a local authority. Graves in this age category, located inside a formal

cemetery administrated by a local authority, require the same authorisation as set out for graves younger than 60 years, in addition to SAHRA authorisation. If the grave is not situated inside a formal cemetery, but is to be relocated to one, permission from the local authority is required and all regulations, laws and by-laws, set by the cemetery authority, must be adhered to.

Human remains that are less than 60 years old are protected under Section 2(1) of the Removal of Graves and Dead Bodies Ordinance (Ordinance no. 7 of 1925), as well as the Human Tissues Act (Act 65 of 1983), and are the jurisdiction of the National Department of Health and the relevant Provincial Department of Health and must be submitted for final approval to the office of the relevant Provincial Premier. This function is usually delegated to the Provincial MEC for Local Government and Planning; or in some cases, the MEC for Housing and Welfare.

Authorisation for exhumation and reinternment must also be obtained from the relevant local or regional council where the grave is situated, as well as the relevant local or regional council to where the grave is being relocated. All local and regional provisions, laws and by-laws must also be adhered to. To handle and transport human remains, the institution conducting the relocation should be authorised under Section 24 of Act 65 of 1983 (Human Tissues Act).

1.3 Description of Study Area

1.3.1 Location Data

The proposed project is located on Portion 1, 2 and 6 of the farm Witkoppies 81 HS, to the south west of Amersfoort, Mpumalanga Province (Figure 1). The topography of the area is relatively flat and the south western portion used to be cultivated. The study area falls within the Mesic Highveld Grassland Bioregion as described by Mucina et al (2006) with the vegetation described as Amersfoort Highveld Clay Grassland. Land use in the general area is characterized by mining and agriculture.

1.3.2. Location Map

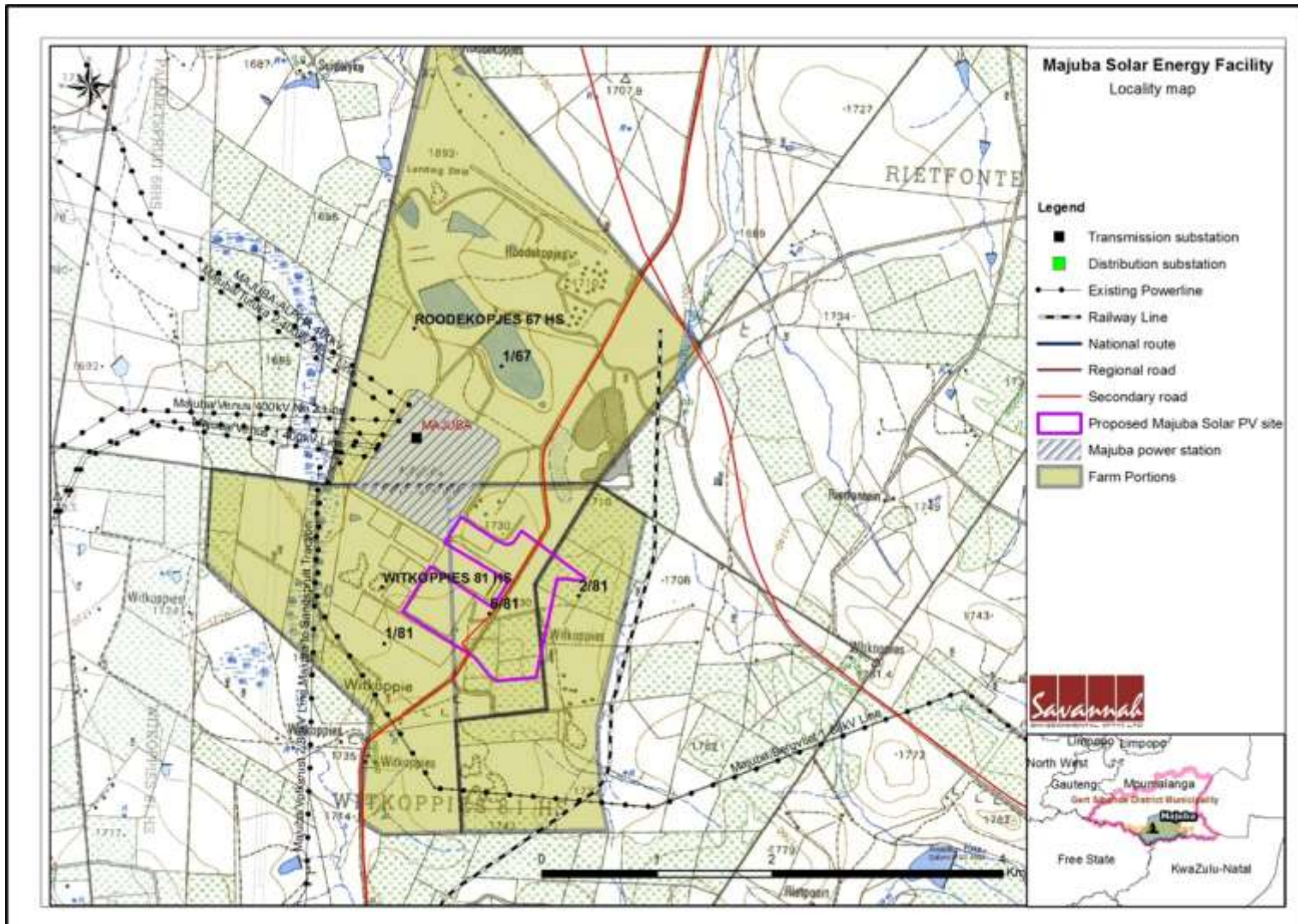


Figure 1: Location map

2. APPROACH AND METHODOLOGY

The aim of the study is to cover archaeological databases to compile a background of the archaeology that can be expected in the study area followed by field verification; this was accomplished by means of the following phases.

2.1 Phase 1 - Desktop Study

The first phase comprised a scoping study, scanning existing records for archaeological sites, historical sites, graves, architecture (structures older than 60 years) of the area (van der Walt 2013). The following approach was followed for the compilation of the scoping report.

2.1.1 Literature Search

Utilising data for information gathering stored in the national archives and published reports relevant to the area. The aim of this is to extract data and information on the area in question.

2.1.2 Information Collection

SAHRIS was consulted to collect data from previously conducted CRM projects in the region to provide a comprehensive account of the history of the study area.

2.1.3 Consultation

No public consultation was done by the author as this was done independently as part of the EIA, no heritage concerns were raised during this process. The team did however consult with the environmental manager of the power station regarding graves or sites of archaeological and historical significance, who is not aware of any such sites.

2.1.4 Google Earth and Mapping Survey

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where sites of heritage significance might be located.

2.1.5 Genealogical Society of South Africa

The database of the Genealogical Society was consulted to collect data on any known graves in the area.

2.2 Phase 2 - Physical Surveying

Due to the nature of cultural remains, the majority of which occurs below surface, a field survey of the PV facility was conducted. The study area was surveyed by means of vehicle and extensive surveys on the

18th February 2015. The survey was aimed at covering the proposed infrastructure, but also focused on specific areas on the landscape that would be more likely to contain archaeological and/or other heritage remains like drainage lines, rocky outcrops as well as slight elevations in the natural topography. These areas were searched more intensively, but many other areas were walked in order to confirm expectations in those areas. Track logs of the areas covered were taken (Figure 2).



Figure 2: Track logs of the areas surveyed indicated in black.

2.3. Restrictions

Due to the fact that most cultural remains may occur below surface, the possibility exists that some features or artefacts may not have been discovered/ recorded during the survey and the possible occurrence of unmarked graves and other cultural material cannot be excluded. This report only deals with the footprint area of the proposed PV facility as indicated in the location map.

Although HCAC surveyed the area as thoroughly as possible, it is incumbent upon the developer to stop operations and inform the relevant heritage agency should further cultural remains, such as graves, stone tool scatters, artefacts, bones or fossils, be exposed during the process of development.

3. NATURE OF THE DEVELOPMENT

The PV Facility will include the following infrastructures:

- » Arrays of photovoltaic (PV) panels.
- » Mounting structures to support the PV panels.
- » Cabling between the projects components.
- » Inverters/transformer enclosures.
- » An on-site substation or switching station.
- » A power line to facilitate the connection of the solar energy facility to the existing substation at the power station.
- » Internal access roads.
- » Buildings (which could include workshop area for maintenance and storage, and an on-site office).

4. HISTORICAL AND ARCHAEOLOGICAL BACKGROUND OF THE STUDY AREA

A detailed scoping report was compiled for this project (van der Walt 2014). The scoping comprised a complete desktop study and below is a short summary of the findings.

4.1 Databases Consulted

SAHRA Report Mapping Project and SAHRIS

Several previous heritage studies were conducted in the immediate vicinity of the study area (SAHRA report mapping project V1.0 and SAHRIS). Studies consulted for this scoping study include Van Schalkwyk (2013), Becker (2008) and Seliane (2013). Becker recorded graves close to the Majuba Power Station and Seliane and van Schalkwyk also recorded graves as well as structures that could be older than 60 years and therefore protected by legislation.

Genealogical Society and Google Earth Monuments

Neither the Genealogical Society nor the monuments database at Google Earth (Google Earth also include some archaeological sites and historical battlefields) have any recorded sites in the study area.

4.2. A Brief History of Human Settlement And Black And White Interaction In The Greater Study area

The Stone Age is divided in Early; Middle and Late Stone Age and refers to the earliest people of South Africa who mainly relied on stone for their tools.

Very few Early Stone Age sites are on record for Mpumalanga and no sites dating to this period are expected for the study area. An example in Mpumalanga is Maleoskop on the farm Rietkloof where ESA tools have been found. This is one of only a handful of such sites in Mpumalanga.

The MSA has not been extensively studied in Mpumalanga but evidence of this period has been excavated at Bushman Rock Shelter, a well-known site on the farm Klipfonteinhoek in the Ohrigstad district. This cave was excavated twice in the 1960's by Louw and later by Eloff. The MSA layers show that the cave was repeatedly visited over a long period. Lower layers have been dated to over 40 000 BP (Before Present) while the top layers date to approximately 27 000 BP (Esterhuizen & Smith in Delius, 2007). MSA material is found widely across South Africa and some MSA manifestations can be expected in the study area.

The Later phases of the Stone Age began at around 20 000 years BP. This period was marked by numerous technological innovations and social transformations within these early hunter-gatherer societies. These people may be regarded as the first modern inhabitants of Mpumalanga, known as the San or Bushmen. They were a nomadic people who lived together in small family groups and relied on hunting and gathering of food for survival. Evidence of their existence is to be found in numerous rock shelters throughout the Eastern Mpumalanga where some of their rock paintings are still visible. A number of these shelters have been documented throughout the Province (Bornman, 1995; Schoonraad in Barnard, 1975; Delius, 2007). These include areas such as Witbank, Ermelo, Barberton, Nelspruit, White River, Lydenburg and Ohrigstad.

The Iron Age as a whole represents the spread of Bantu speaking people and includes both the pre-Historic and Historic periods. It can be divided into three distinct periods:

- » The Early Iron Age: Most of the first millennium AD.
- » The Middle Iron Age: 10th to 13th centuries AD
- » The Late Iron Age: 14th century to colonial period.

The Iron Age is characterised by the ability of these early people to manipulate and work Iron ore into implements that assisted them in creating a favourable environment to make a better living. No Sites dating to the Early or Middle Iron Age have been recorded or is expected for the study area. The same goes for the Later Iron Age period where the study area is situated outside the southern periphery of distribution of Late Iron Age settlements in Mpumalanga. This phase of the Iron Age (AD 1600-1800's) is represented by various tribes including Ndebele, Swazi, BaKoni, Pedi marked by extensive stonewalled settlements found throughout the Mpumalanga escarpment

Iron Age sites have been identified to the north of the area, around Bethal (Bergh 1999: 6-7). These all are dated to the Late Iron Age. It is also known that the early trade routes did not run through this area (Bergh 1999: 9).

Anglo Boer War

During the second Anglo Boer War the Town of Standerton played a role when a British Garrison was besieged in the town for three months.

During the British march into the Transvaal between February and September 1900, several troops passed by the area where Witbank is situated today. The battalions of Lieutenant Generals J. French, R. Pole-Carew and F. Roberts all travelled close by the Witbank area and through Middelburg. A railway line ran along this route at the time. (Bergh 1999: 51)

During the Anglo-Boer War, two railway stations were located in the vicinity of the Witbank area, and close to each a black concentration camp had been established. At Middelburg, about 20 kilometres to the east of Witbank, one white and one black concentration camp was also set up. During the Anglo Boer War the Highveld areas saw much action consisting of various skirmishes between Boer and Brit.

5. HERITAGE SITE SIGNIFICANCE AND MITIGATION MEASURES

The presence and distribution of heritage resources define a 'heritage landscape'. In this landscape, every site is relevant. In addition, because heritage resources are non-renewable, heritage surveys need to investigate an entire project area, or a representative sample, depending on the nature of the project. In the case of the proposed project the local extent of its impact necessitates a representative sample and only the footprint of the areas demarcated for development were surveyed. In all initial investigations, however, the specialists are responsible only for the identification of resources visible on the surface.

This section describes the evaluation criteria used for determining the significance of archaeological and heritage sites. The following criteria were used to establish site significance:

- » The unique nature of a site;
- » The integrity of the archaeological/cultural heritage deposits;
- » The wider historic, archaeological and geographic context of the site;
- » The location of the site in relation to other similar sites or features;
- » The depth of the archaeological deposit (when it can be determined/is known);
- » The preservation condition of the sites;
- » Potential to answer present research questions.

Furthermore, The National Heritage Resources Act (Act No 25 of 1999, Sec 3) distinguishes nine criteria for places and objects to qualify as 'part of the national estate' if they have cultural significance or other special value. These criteria are:

- » Its importance in/to the community, or pattern of South Africa's history;
- » Its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;

- » Its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- » Its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- » Its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- » Its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- » Its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- » Its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa;
- » Sites of significance relating to the history of slavery in South Africa.

5.1. Field Rating of Sites

Site significance classification standards prescribed by SAHRA (2006), and acknowledged by ASAPA for the SADC region, were used for the purpose of this report. The recommendations for each site should be read in conjunction with section 7 of this report.

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.C)	-	Low significance	Destruction

5.2 Impact Rating of Assessment

The criteria below are used to establish the impact rating of sites as per the impact rating methodology employed by Savannah environmental:

- » The **nature**, which shall include a description of what causes the effect, what will be affected and how it will be affected.
- » The **extent**, wherein it will be indicated whether the impact will be local (limited to the immediate area or site of development) or regional, and a value between 1 and 5 will be assigned as appropriate (with 1 being low and 5 being high):
- » The **duration**, wherein it will be indicated whether:
 - * the lifetime of the impact will be of a very short duration (0-1 years), assigned a score of 1;
 - * the lifetime of the impact will be of a short duration (2-5 years), assigned a score of 2;
 - * medium-term (5-15 years), assigned a score of 3;
 - * long term (> 15 years), assigned a score of 4; or
 - * permanent, assigned a score of 5;
- » The **magnitude**, quantified on a scale from 0-10 where; 0 is small and will have no effect on the environment, 2 is minor and will not result in an impact on processes, 4 is low and will cause a slight impact on processes, 6 is moderate and will result in processes continuing but in a modified way, 8 is high (processes are altered to the extent that they temporarily cease), and 10 is very high and results in complete destruction of patterns and permanent cessation of processes.
- » The **probability of occurrence**, which shall describe the likelihood of the impact actually occurring. Probability will be estimated on a scale of 1-5 where; 1 is very improbable (probably will not happen), 2 is improbable (some possibility, but low likelihood), 3 is probable (distinct possibility), 4 is highly probable (most likely) and 5 is definite (impact will occur regardless of any prevention measures).
- » The **significance**, which shall be determined through a synthesis of the characteristics described above and can be assessed as low, medium or high; and
- » the **status**, which will be described as either positive, negative or neutral.
- » the degree to which the impact can be reversed.
- » the degree to which the impact may cause irreplaceable loss of resources.
- » the *degree* to which the impact can be mitigated.

The **significance** is calculated by combining the criteria in the following formula:

$$S=(E+D+M)P$$

S = Significance weighting

E = Extent

D = Duration

M = Magnitude

P = Probability

The **significance weightings** for each potential impact are as follows:

- » < 30 points: Low (i.e., where this impact would not have a direct influence on the decision to develop in the area),
- » 30-60 points: Medium (i.e., where the impact could influence the decision to develop in the area unless it is effectively mitigated),
- » > 60 points: High (i.e., where the impact must have an influence on the decision process to develop in the area).

6. BASELINE STUDY-DESCRIPTION OF SITES

It is important to note that the entire farm Witkoppies 81 HS was not surveyed but only the footprint of the proposed solar facility that was surveyed on foot and by vehicle (Figure 1 & 2). The area identified for the solar facility measures approximately 105 ha. The study area is characterised by typical Highveld grass veld (Figure 3 – 5) and some portions, especially in the eastern section of the study area was extensively ploughed in the past. Infrastructure like roads etc. also impacted on the study area and these activities would have destroyed surface indicators of heritage sites. The study area is slightly undulating with no major landscape features like pans or hills that would have been focal points in antiquity and lack raw material suitable for the manufacture of stone artefacts or for the construction of late Iron Age Stone walled settlements.

The study area was assessed in terms of the archaeological component of Section 35 of the NHRA and no surface indicators of archaeological (Stone or Iron Age) material was identified in the study area. In terms of the built environment of the area (Section 34), no standing buildings older than 60 years occur in the areas visited although several modern structures (Figure 6) occur in the north western portion at S 27.10682° E 29.77225° (Figure 7). These structures are associated with the operation of the power station and consist of corrugated iron sheds and prefab buildings used for offices and are not older than 60 years or of heritage significance. No burial grounds or graves were recorded and no significant cultural landscapes or viewsapes were noted during the fieldwork.

As graves can be expected anywhere on the landscape and due to poor visibility at the time of the survey due to vegetation cover (long grass) and the fact that the area has been disturbed it is recommended that a chance find procedure is incorporated for this project.



Figure 3. General site conditions.



Figure 4. General site conditions.



Figure 5. General Site conditions



Figure 6. Modern structures in the north western portion of the study area.



Figure 7: Location of standing structures in the study area.

Impact evaluation of the proposed project on heritage resources

Nature: Pre Construction and Construction activities can have a negative impact on heritage resources. Please refer to section 7 for recommendations.		
	Without mitigation	With mitigation
Extent	Local (2)	Local (1)
Duration	Permanent (5)	Permanent (5)
Magnitude	Low (3)	Low (2)
Probability	Not Probable (1)	Not Probable (1)
Significance	Low (10)	Low (9)
Status (positive or negative)	Negative	Negative
Reversibility	Not reversible	Not reversible
Irreplaceable loss of resources?	Yes	Yes
Can impacts be mitigated?	Yes	
Mitigation: Implementing of Chance find procedure.		
Cumulative impacts: N.A.		
Residual Impacts: N.A		

7. CONCLUSIONS AND RECOMMENDATIONS

Heritage Contracts and Archaeological Consulting CC (HCAC) has been contracted by Savannah Environmental (Pty) Ltd to conduct an Archaeological Impact Assessment for the proposed Majuba Solar PV Facility that is located on Portion 1, 2 and 6 of the farm Witkoppies 81 HS, to the south west of Amersfoort, Mpumalanga Province. It is important to note that the entire farm was not surveyed but only the footprint of the proposed solar facility that was surveyed on foot and by vehicle. The study area is characterised by typical Highveld grass veld and some portions were extensively ploughed in the past. Infrastructure like roads etc. also impacted on the study area and these activities would have destroyed surface indicators of heritage sites. The study area is slightly undulating with no major landscape features like pans or hills that would have been focal points in antiquity and lack raw material suitable for the manufacture of stone artefacts or for the construction of late Iron Age Stone walled settlements.

The study area was assessed in terms of the archaeological component of Section 35 of the NHRA and no surface indicators of archaeological (Stone or Iron Age) material was identified in the study area. In terms of the built environment of the area (Section 34), no standing buildings older than 60 years occur in the areas visited although some modern structures occur in the north western portion of the study area. These structures are associated with the operation of the power station and are not older than 60 years. No burial grounds or graves were recorded and no significant cultural landscapes or views were noted during the fieldwork.

Based on the results of the study there are no significant archaeological risks associated with the proposed solar facility. However graves can be expected anywhere on the landscape and the low archaeological visibility during the survey could result in graves not identified in the study area. Therefore it is recommended that a chance find procedure is incorporated into the EMP for this project as detailed below.

Chance find procedure

This procedure applies to the developer's permanent employees, its subsidiaries, contractors and subcontractors, and service providers. The aim of this procedure is to establish monitoring and reporting procedures to ensure compliance with this policy and its associated procedures. Construction crews must be properly inducted to ensure they are fully aware of the procedures regarding chance finds as discussed below.

- If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or rock engraving, this person must cease work at the site of the find

and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.

- It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find, and confirm the extent of the work stoppage in that area.
- The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA.

7.1 Reasoned Opinion

From a heritage perspective the proposed project area is acceptable from a heritage point of view. If the above recommendations are adhered to and based on approval from SAHRA, HCAC is of the opinion that the development can continue as the impact of the development on heritage will not impact negatively on the archaeological record of Mpumalanga. If during the pre-construction phase or during construction, any archaeological finds are made (e.g. graves, stone tools, and skeletal material), the operations must be stopped, and the archaeologist must be contacted for an assessment of the finds. Due to the subsurface nature of archaeological material and graves the possibility of the occurrence of unmarked or informal graves and subsurface finds cannot be excluded, but can be easily mitigated by preserving the sites *in-situ* within the development.

8. PROJECT TEAM

Jaco van der Walt, Project Manager

9. STATEMENT OF COMPETENCY

I (Jaco van der Walt) am a member of ASAPA (no 159), and accredited in the following fields of the CRM Section of the association: Iron Age Archaeology, Colonial Period Archaeology, Stone Age Archaeology and Grave Relocation. This accreditation is also valid for/acknowledged by SAHRA and AMAFA.

I have been involved in research and contract work in South Africa, Botswana, Zimbabwe, Mozambique, Tanzania and the DRC; having conducted more than 300 AIA's since 2000.

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