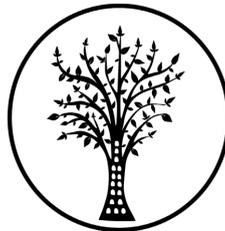


ARCHAEOLOGICAL SPECIALIST STUDY

In terms of Section 38(8) of the NHRA for a

Proposed development of a cement factory, Middelburg, Eastern Cape

Prepared by



CTS HERITAGE

Dr Will Archer
Dr Darya Presnyakova
Jenna Lavin

In Association with

Amathemba Environmental Consultants

January 2022



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EXECUTIVE SUMMARY

Concrete Units (Pty) Ltd is proposing the establishment and operation of a concrete batch plant and pre-cast facility to manufacture components for the towers of the new (approved) Noupoort wind farm cluster. The facility is proposed on Portion 11 of Farm Bultfontyn 128 in Middelburg, Eastern Cape, and will occupy a footprint of approximately 12 hectares and can be located within either the northern or the southern portion of the identified site area.

The findings of the field assessment corroborate the findings of previous assessments in the broader area. Interestingly, archaeological resources of greater density and significance were identified in area Option 1 than in area Option 2 although it is acknowledged that the developer prefers Option 1. Should Option 1 proceed, the significant sites identified within this area (MID8 and MID11) will require mitigation interventions to limit the anticipated negative impact of the proposed development. Such mitigation intervention will require:

- Permission from SAHRA to conduct the mitigation interventions
- the formal scientific recording and collection of the artefacts located at the surface
- scientific and systematic excavation of these sites if deemed necessary by the archaeologist
- Archaeological monitoring of development activity in the vicinity of the finds by an archaeologist
- formal scientific write up of the findings for submission to SAHRA for approval

Should Option 2 proceed, no excavation mitigation is recommended however it is possible that significant archaeological heritage may be located beneath the ground surface and may be impacted by the proposed development.

Based on the findings of this assessment, there is no objection to the proposed development in principle on condition that the following recommendations are implemented:

- Option 2 is preferred from an archaeological perspective
- Should Option 2 be implemented, a 20m no-go buffer must be implemented around site MID12
- Should Option 1 be implemented, the mitigation recommended above must be implemented for sites MID8 and MID 11 including surface collection of artefacts and monitoring of development activities in the area
- Should Option 1 be implemented, a 20m no-go development buffer must be implemented around sites MID2_2 and MID3

Should any previously unknown archaeological resources or human remains be uncovered during the course of construction activities, work must cease and SAHRA must be contacted immediately regarding a way forward.



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Details of Specialist who prepared the HIA

Jenna Lavin, an archaeologist with an MSc in Archaeology and Palaeoenvironments, and currently completing an MPhil in Conservation Management, heads up the heritage division of the organisation, and has a wealth of experience in the heritage management sector. Jenna's previous position as the Assistant Director for Policy, Research and Planning at Heritage Western Cape has provided her with an in-depth understanding of national and international heritage legislation. Her 8 years of experience at various heritage authorities in South Africa means that she has dealt extensively with permitting, policy formulation, compliance and heritage management at national and provincial level and has also been heavily involved in rolling out training on SAHRIS to the Provincial Heritage Resources Authorities and local authorities.

Jenna is on the Executive Committee of the Association of Professional Heritage Practitioners (APHP), and is also an active member of the International Committee on Monuments and Sites (ICOMOS) as well as the International Committee on Archaeological Heritage Management (ICAHM). In addition, Jenna has been a member of the Association of Southern African Professional Archaeologists (ASAPA) since 2009. Recently, Jenna has been responsible for conducting training in how to write Wikipedia articles for the Africa Centre's WikiAfrica project.

Since 2016, Jenna has drafted over 80 Heritage Impact Assessments throughout South Africa.



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CONTENTS

| | |
|---|-----------|
| 1. INTRODUCTION | 3 |
| 1.1 Background Information on Project | 3 |
| 1.2 Description of Property and Affected Environment | 4 |
| 2. METHODOLOGY | 9 |
| 2.1 Purpose of Archaeological Study | 9 |
| 2.2 Summary of steps followed | 9 |
| 2.3 Constraints & Limitations | 10 |
| 3. HISTORY AND EVOLUTION OF THE SITE AND CONTEXT | 10 |
| 4. IDENTIFICATION OF HERITAGE RESOURCES | 12 |
| 4.1 Field Assessment | 12 |
| 4.2 Archaeological Resources identified | 25 |
| 5. ASSESSMENT OF THE IMPACT OF THE DEVELOPMENT | 28 |
| 5.1 Assessment of impact to Archaeological Resources | 28 |
| 6. CONCLUSION AND RECOMMENDATIONS | 29 |
| 7. REFERENCES | 30 |



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1. INTRODUCTION

1.1 Background Information on Project

Concrete Units (Pty) Ltd is proposing the establishment and operation of a concrete batch plant and pre-cast facility to manufacture components for the towers of the new (approved) Noupoort wind farm cluster. The facility is proposed on Portion 11 of Farm Bultfontyn 128 in Middelburg, Eastern Cape, and will occupy a footprint of approximately 12 hectares and can be located within either the northern or the southern portion of the identified site area.

These two footprint alternatives will be considered in the Basic Assessment process. The project itself does not constitute a wind energy facility. It involves the construction of pre-cast concrete panels that will be used for the off-site assembly of towers for wind turbines. The proposed facility will comprise of the following key operational areas:

- Site facilities area that will house the administrative offices, ablutions, etc.
- Concrete batch plant area where the cement and aggregate silos / stores will be located and where the concrete will be mixed.
- Warehouse and other raw material (e.g. steel rebars, tying wire) storage area, including the waste management area where waste will be temporarily stored prior to removal off site for disposal.
- Reinforcement and precast area where the cut and bend steel rebars will be assembled into cages and placed into cleaned and oiled moulds with the concrete to cure and set into the required panels.
- Panel storage area from where panels will be loaded onto trucks for delivery to the various approved wind energy facilities in the region.

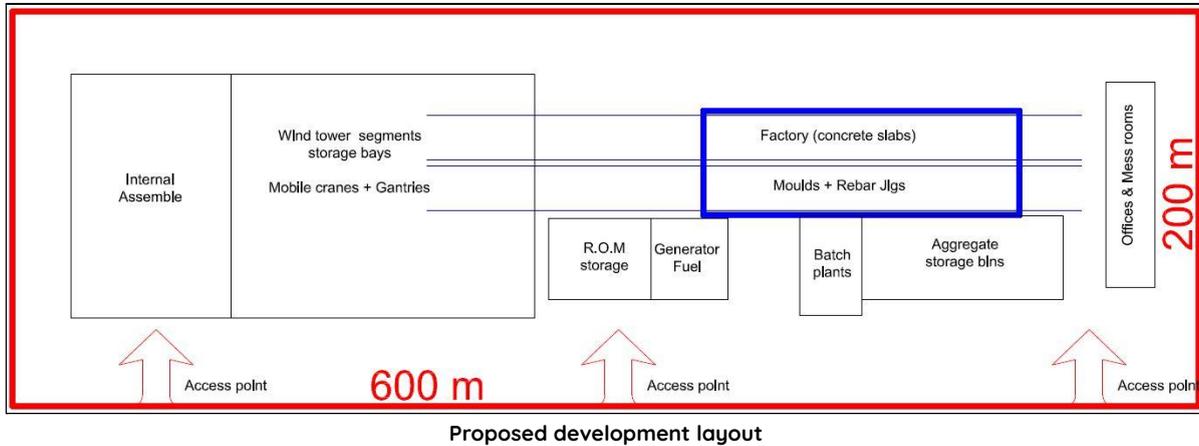
Associated infrastructure will include internal roadways, stormwater management measures, pipelines to transport water from the existing borehole on the property to the facility and diesel generators that will be used to generate the electricity required by the facility. Diesel storage facilities will therefore also be required. Pipeline and fuel storage infrastructure will however not meet the thresholds considered in related listed activities.

Access to the site will be gained via an existing gravel road (DR02589) that leads off the N9 highway. Upgrades may be required to the access road to accommodate the trucks that will transport the concrete panels to the wind energy facilities. This is currently being deliberated by the appointed traffic engineers, however the engineers confirmed that required upgrades (if needed), will not constitute any of the road related listed activities.

The facility will not be a permanent installation as it will operate only as long as construction on the Noupoort wind farm cluster is ongoing. Given that three of the 5 wind farms in the area have already been awarded to EDF (the renewable power producer that will utilise the concrete panels from the facility), it is anticipated that operations on site will last for approximately 3 years. However, to allow for the potential of the other two projects being awarded in the next renewable energy BID rounds, application will be made for the facility to operate for 5 years. This will be followed by a decommissioning phase, during which time the facility will be closed, structures will be demolished, and rehabilitation will take place. This will all form part of the scope of the application.



The Basic Assessment Report will include more details on the manufacturing process itself. Structures and infrastructure will comprise of cement silos, aggregate stores, batch plant, warehouse structure for pre-cast activities, admin offices, laydown / storage areas, fuel store and generators, sewage and stormwater infrastructure, etc.



Proposed development layout

1.2 Description of Property and Affected Environment

The footprint of the proposed concrete batch plant and pre-cast facility as well as its associated infrastructure is located across several agricultural camps approximately 6.09 km south-south-east of the town of Middelberg, in the Eastern Cape Province of South Africa.

Arid and semi-arid Nama-Karoo shrub and grassland typical of the Nama-Karoo Biome are prevalent throughout the two options for the footprint of the facility (Options 1 and 2). In locations where historical grazing pressure has been more severe, the surface soil exposure is greater with shales outcropping in the form of secondary colluvial nodules and primary context bedrock in several places, as well as higher visibility for archaeological material. The raw-material upon which stone artefacts were manufactured in the documented archaeological sites is exclusively hornfels, a rock directly associated with the induration of veins in the local bedrock. The survey was conducted in December (2021) at the beginning of the summer rainfall season, when average regional monthly precipitation is significantly higher than in the preceding April-October. Thus moderate vegetation coverage due to recent rains was evident during the survey (see also **Constraints and Limitations**). The two option areas have a gradually undulating topography. Both options have reasonable archaeological visibility, but have significant differences in the presence of archaeological material.

In locations more exposed to grazing, the initiation of marginal donga formation is evident where vegetation has been completely removed. All archaeological occurrences were in surface and recently deflated contexts, and little evidence for sub-surface in situ horizons was documented. Although evidence of grazing and animal activity is evident across much of the potential development footprint, bioturbation of the topsoil through stock aggregation appears to be minimal. Much of the archaeological material is therefore regarded to retain a moderate degree of spatial integrity, even though no evidence for dateable localities was identified.

Archaeological material is present in discretely varying but occasionally continuous accumulations throughout the affected environment, but finds are significantly denser within the Option 1 area.



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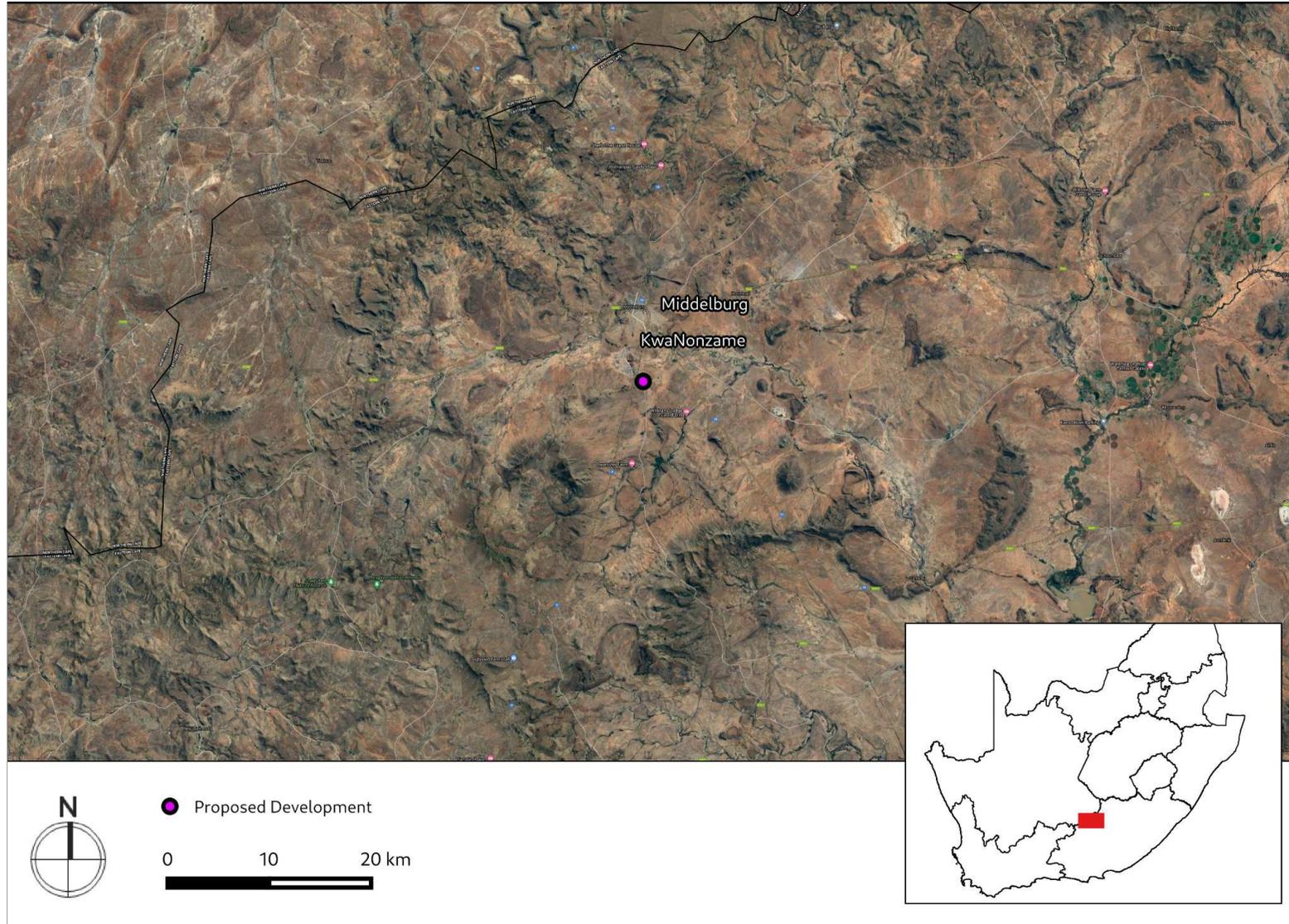


Figure 1.1: Close up satellite image indicating proposed location of study area



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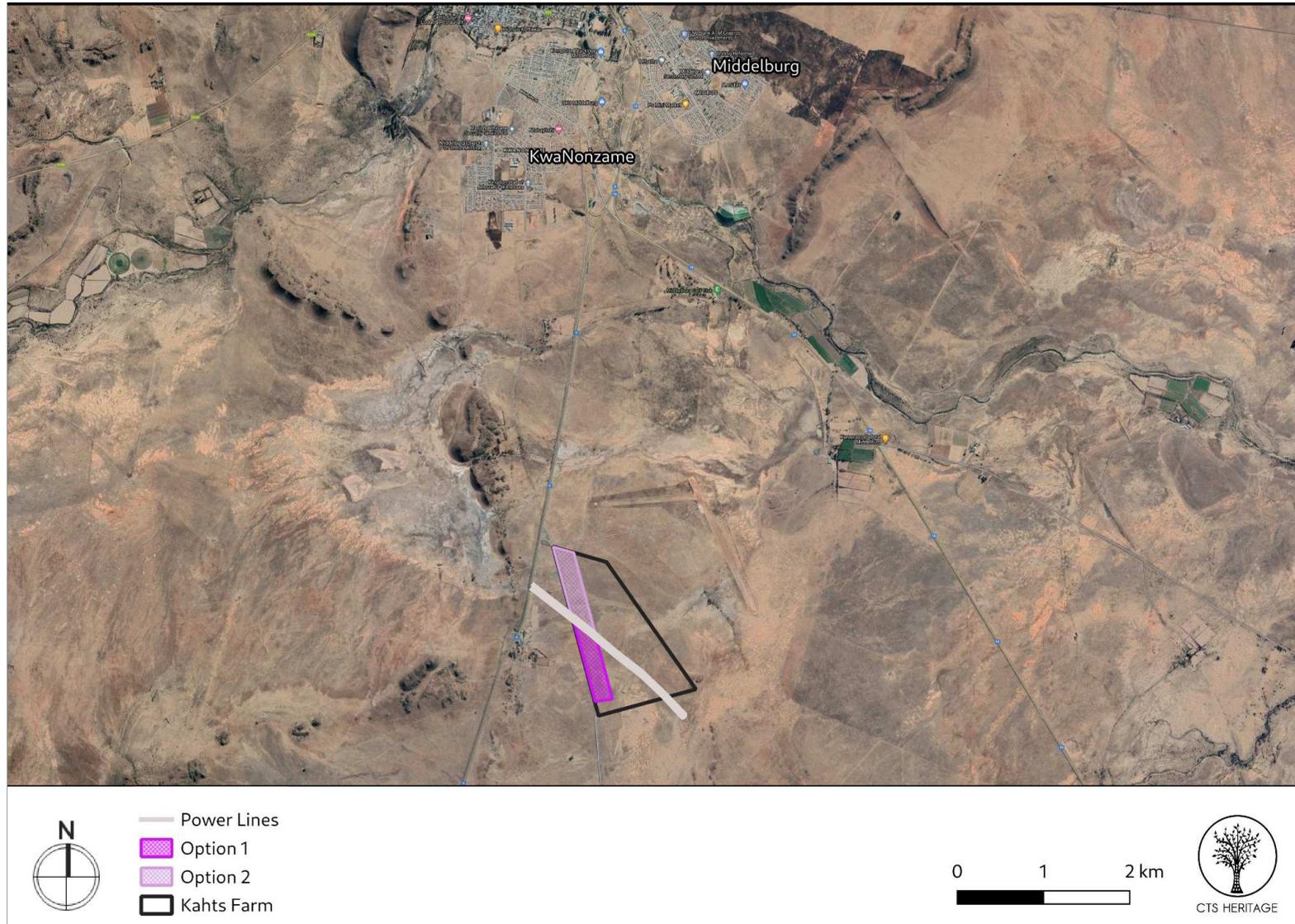


Figure 1.2: Study Area



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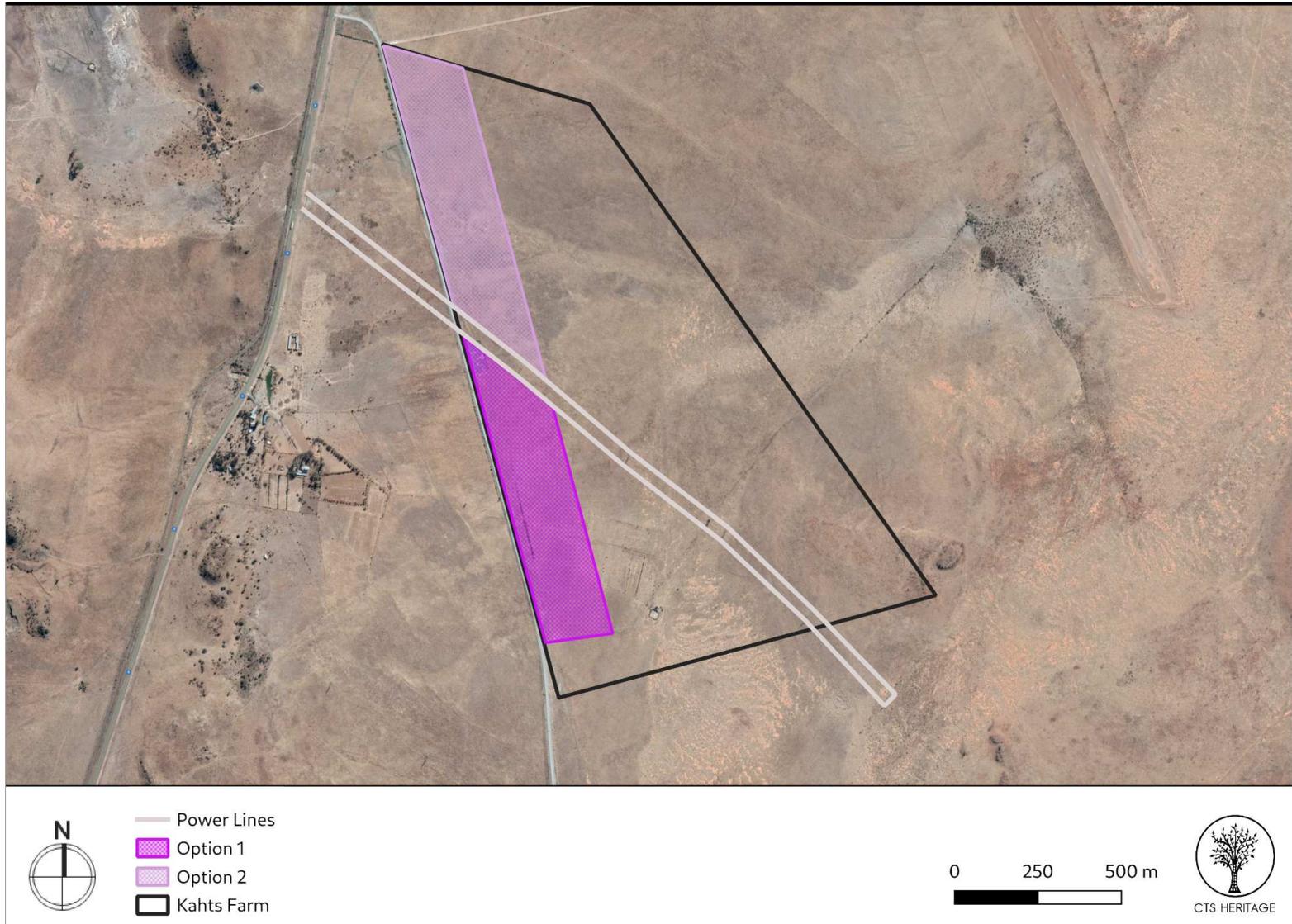
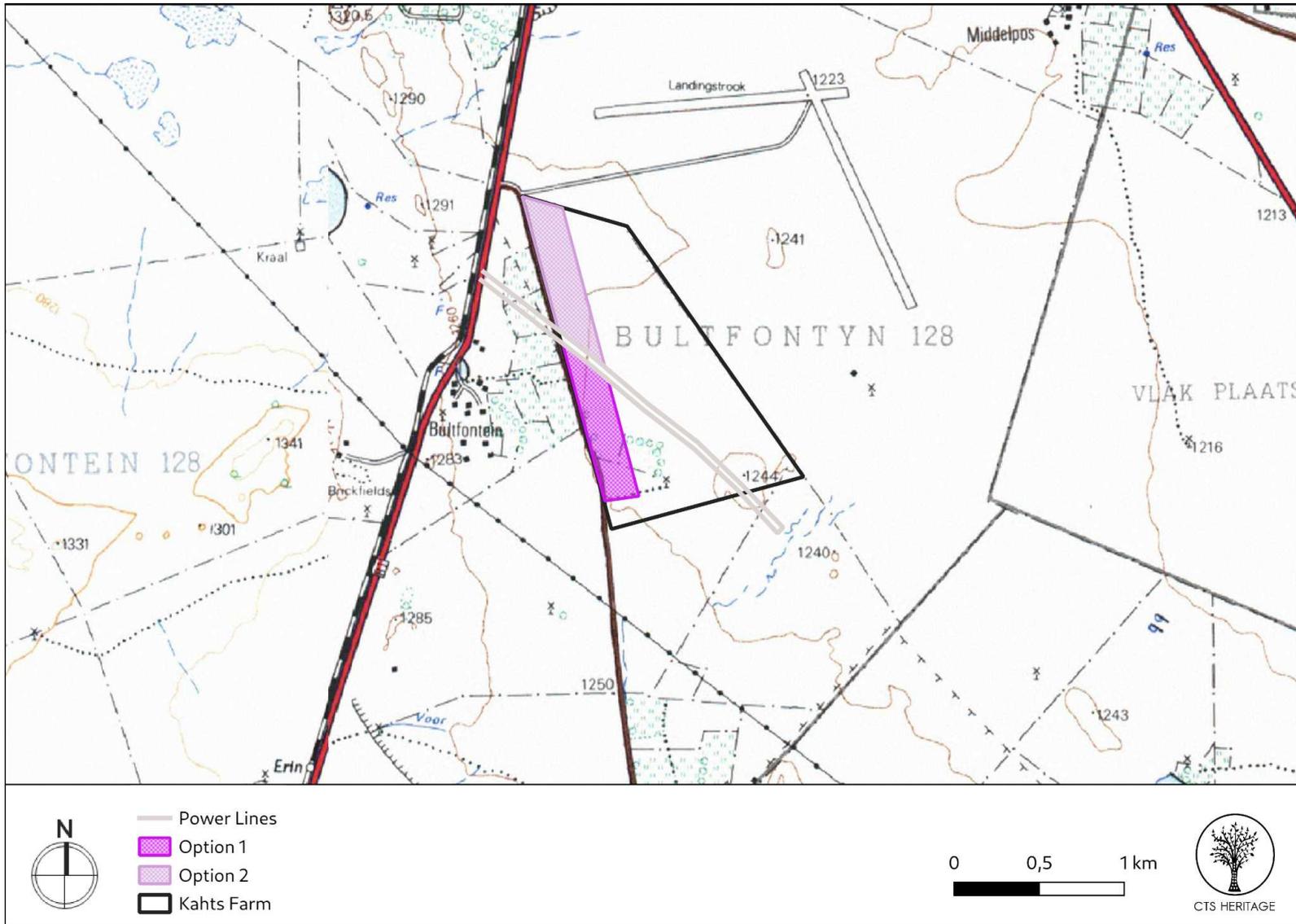


Figure 1.3: Study Area



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2. METHODOLOGY

2.1 Purpose of Archaeological Study

The purpose of this archaeological study is to satisfy the requirements of section 38(8), and therefore section 38(3) of the National Heritage Resources Act (Act 25 of 1999) in terms of impacts to archaeological resources.

2.2 Summary of steps followed

- Two archaeologists conducted a survey of the site and its environs on 19 December 2021 for approximately 8 hours to determine what archaeological resources are likely to be impacted by the proposed development.
- The study area was assessed on foot in transects, photographs of the context and finds were taken, and tracks were recorded using a GPS.
- The identified resources were assessed to evaluate their heritage significance in terms of the grading system outlined in section 3 of the NHRA (Act 25 of 1999).
- Alternatives and mitigation options were discussed with the Environmental Assessment Practitioner.

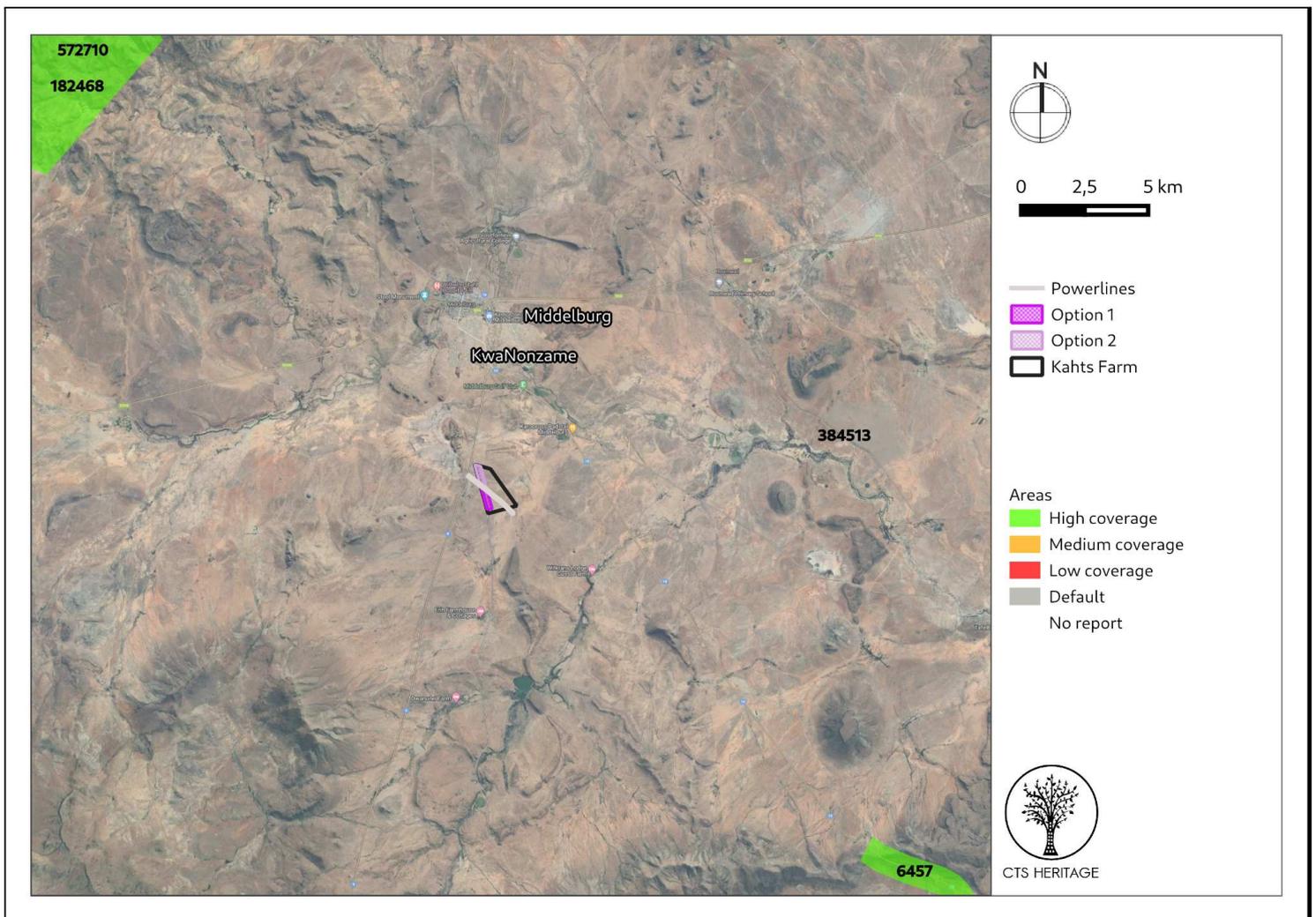


Figure 2: Close up satellite image indicating proposed location of the study area in relation to heritage studies previously conducted



2.3 Constraints & Limitations

The survey was conducted on the 19th of December, 2021 at the start of the summer rainfall season. Scattered lighting storms inhibited foot survey for brief periods throughout the day. Although the entirety of the footprint was comprehensively surveyed, conditions in terms of lighting - with regard to identifying ephemeral surface archaeology - were not optimal when there was substantial cloud cover (Fig. 4.2).

In the southern portions of the footprint that appear to have been utilized recently for stock farming/grazing, grass and bush cover moderately thick in several places, making surveying ground level archaeological exposures more challenging, although substantial archaeological occurrences were documented nonetheless. We are thus confident that the archaeological sensitivity and scientific potential of the project area has been comprehensively assessed.

3. HISTORY AND EVOLUTION OF THE SITE AND CONTEXT

The area proposed for development is located approximately 6km south of Middelburg in the Eastern Cape. In 1837 the Cape Colony government proclaimed the district of Colesberg, and established the Town of Middelburg in 1852, so named since it is midway between Graaff-Reinet and Colesberg. (It is also approximately halfway between Port Elizabeth and Bloemfontein, as well as between Johannesburg and Cape Town.) The town and surrounding areas are rich in history from the Anglo Boer War. In addition, prior to colonial settlement, the Middelburg area would have been home to Stone Age peoples as evidenced by Early, Middle and Later Stone Age (ESA, MSA and LSA) artefacts found in the area and later, Khoe herders and San hunter-gatherers. Rock art has been identified in the broader Middelburg area, and the Sneeuberg range to the south of Middelburg, was a haven for the San where they hunted and gathered plants, bulbs and fruit for food.

Booth (2012) completed an HIA for a nearby project (SAHRIS ID 384513, Figure 2). Booth (2012) notes that “The Albany Museum database includes records of occurrences of Acheulian handaxes between Middelburg and the Camdeboo National Park near Graaff Reinet, Sampson (1985) located a large number of sites and there is also a collection in the Albany Museum from the Cradock area.” Booth (2012) also notes that “The Albany Museum database holds records of the occurrence of Middle Stone Age stone artefacts around the Cradock area and the Department of Archaeology has curated Middle Stone Age stone artefacts in its collection from the Cradock area including Highlands Rock Shelter excavated by H.J. Deacon during the 1970’s. Relevant archaeological impact assessments conducted by the Archaeology Contracts Office of the National Bloemfontein Museum in 2006 (Van Ryneveld & Koortzen 2006) and the Albany Museum in 2008 have recorded surface scatters of Middle Stone Age stone artefacts in the Cradock vicinity (Binneman & Booth 2008). Middle Stone Age stone artefacts (long blades and points) are found throughout the region, but because these are found in the open areas it is difficult to know where they fit into the cultural time sequence. At Highlands Rock Shelter MSA stone artefacts, possibly a Howieson’s Poort Industry, was dated older than 30 000 years (Deacon 1976). Sampson on the other hand reported many open-air MSA sites which he assigned to the Orangian Industry (dating between 128 000 - 75 000 years old), Florisbad and Zeekoegat Industries dating between 64 000 and 32 000 years old.” In her assessment, Booth (2012) identified predominantly MSA artefacts within the area surveyed in her assessment, most of which are not in situ. It is likely that similar archaeological heritage is present within the area proposed for the development of the cement factory.



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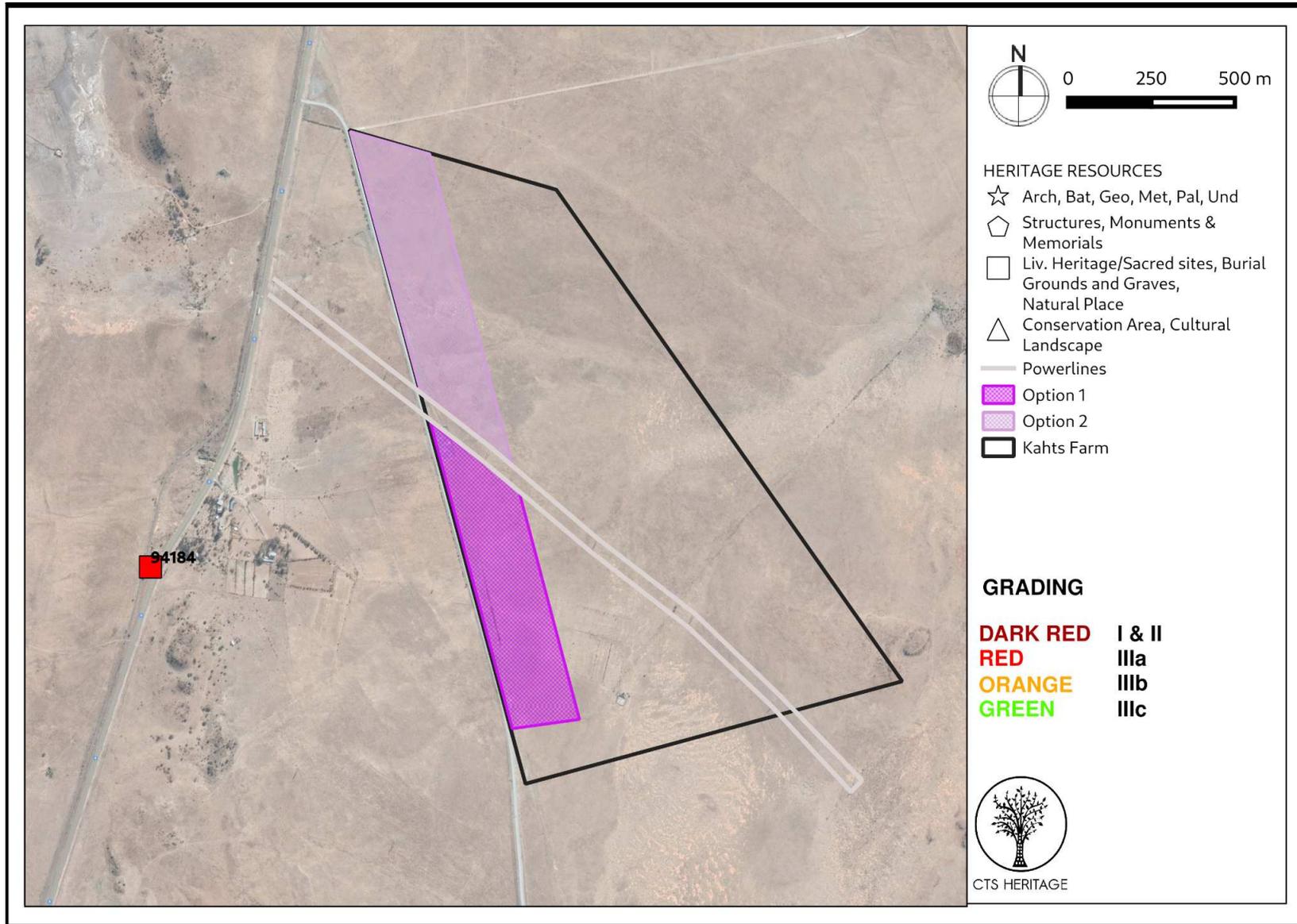


Figure 3. Heritage Resources Map. Heritage Resources previously identified in and near the study area, with SAHRIS Site IDs indicated



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4. IDENTIFICATION OF HERITAGE RESOURCES

4.1 Field Assessment

The archaeological survey was conducted on foot, and sought to comprehensively assess the presence and significance of archaeological occurrences within the two option areas for the facility (Options 1 and 2). The field assessment documented a substantial number of stone artefact scatters in secondary contexts, and a small number of stone features in close to primary context.

Cumulatively these finds suggest the area was occupied or traversed intermittently by Stone Age groups through periods in the Early Stone Age (ESA: ~2.6ma--~300ka), the Middle Stone Age (MSA: ~300ka: 30-40 ka), and the Later Stone Age (LSA: ~40ka- ~2ka), as well as potentially by groups in periods associated with herder and early historical occupations of the region (as indicated by the ephemeral stone structures <2 ka). The relatively more scientifically significant sites/finds are associated with locations MID8 and MID11, which have clear Fauresmith (later Acheulean) and early MSA components of lithics (prepared core technologies), as well as walling structures nearby which should be avoided.

High quality raw-material - indurated shale (hornfels) - was found within the footprint, indicating that the stone artefacts documented were manufactured within the vicinity of the area by prehistoric foragers. The raw-materials exploited were colluvial cobbles of hornfels, or hornfels sourced from primary outcrops which is evidenced by variation in the cortex (naturally weathered crusts) on the nodules and on the artefacts present in the documented sites.

All archaeological finds were documented in what appear to be *ex-situ* surface contexts. However, the absence of evidence for trampling of artefacts suggests that post-depositional effects on surface stone scatters may be only marginal in many locations. Further, the presence of artefacts that are currently deflating out of topsoils suggests that there may be sub-surface archaeological occurrences within the footprint. The potential for finding a preserved and dateable *in-situ* archaeological horizon based on surface observations, however, is low based on the absence of dateable organic materials and the bioturbated nature of sediments partially encompassing some of the artefacts. However the presence of sub-surface contextualized materials cannot be excluded as a possibility. Excavation associated with the development should therefore be aware of the potential for sub-surface archaeological materials.



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Figure 4.1: Example of optimal visibility area with a high density of archaeological finds, mostly stone tools.



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Figure 4.2: Poor visibility where substantial shrub and grass cover has inhibited survey.



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Figure 4.3: Area with good visibility and low densities of archaeological finds.



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Figure 4.4: Area with good visibility and low densities of archaeological finds.



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Figure 4.5: Well preserved historical structure (MID3)



Figure 4.6: An archaeological site (MID4) with artefacts eroding on the surface



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Figure 4.7: MSA artefacts (MID4) made on hornfels



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Figure 4.8: A concentration (MID8) of Acheulean-Fauresmith artefacts (ESA period) eroding on the surface



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Figure 4.9: ESA Acheulean artefacts from MID8 site (small bifacial tools)



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Figure 4.10: ESA Fauresmith artefacts from the MID8 site



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Figure 4.11: Relatively recent historical structure (MID12)



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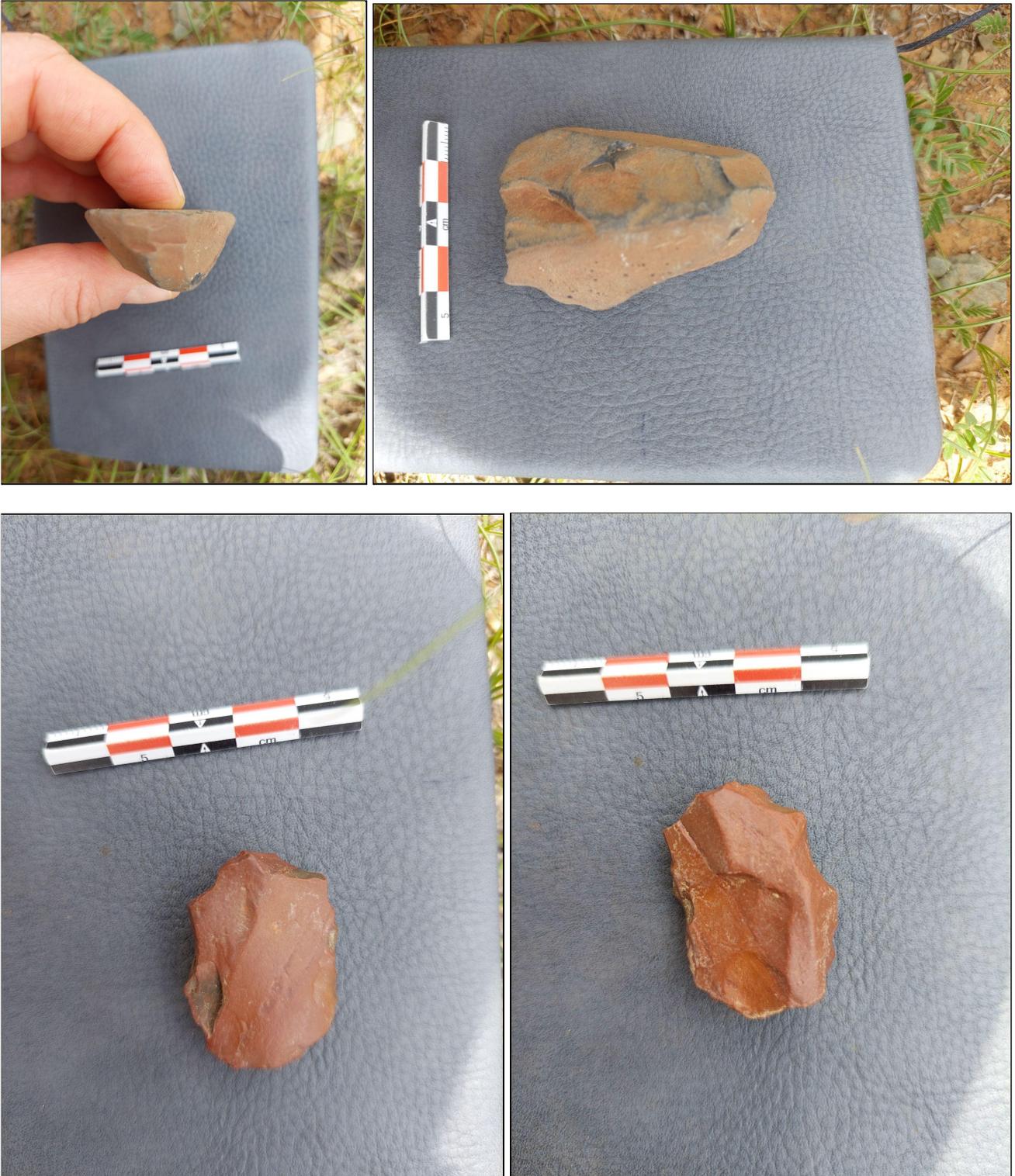


Figure 4.12: LSA artefacts (MID) made on hornfels



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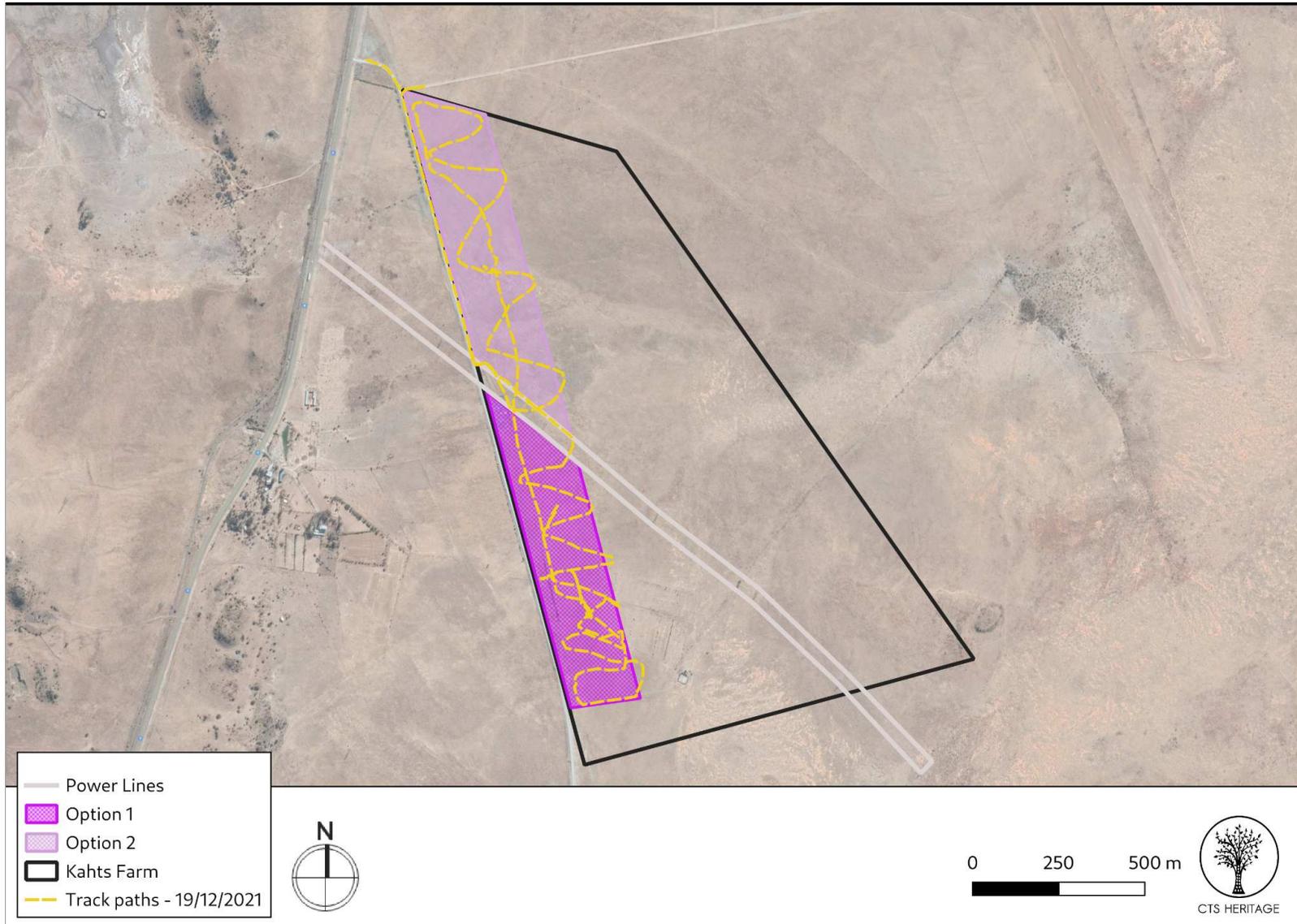


Figure 5.1: Overall track paths of foot survey



4.2 Archaeological Resources identified

Table 1: Observations noted during the field assessment

| Site No. | Site Name | Option | Description | Density m ² | Period | Co-ordinates | | Grading | Mitigation |
|----------|-----------|--------|---|------------------------|--------------|--------------|----------|---------|--|
| 1 | MID1 | 2 | A concentration of weathered hornfels artefacts. The site was disturbed by a bioturbation process most likely a mole rat activity. Finds include retouched flakes and fragments, no cortex, prepared platforms. | ~4-20/m ² | MSA | 31,56032 | 25,01533 | NCW | NA |
| 2 | MID2_1 | 1 | A concentration of weathered hornfels artefacts. Overlaps with a historical structure. The site was disturbed by a bioturbation process most likely a mole rat activity. Finds include cortical artefacts, cores and a hammerstone possibly suggesting it was a tool production area. | ~4-20/m ² | MSA | 31,56206 | 25,01626 | NCW | NA |
| 3 | MID2_2 | 1 | Historical structure, possibly remnants of a kraal. Overlaps with MSA artefacts. Possible structure is unclear and poorly preserved. | NA | Historical | 31,56206 | 25,01626 | IIIC | 20m Buffer |
| 4 | MID3 | 1 | Historical structure, possibly remnants of a kraal. | NA | Historical | 31,56306 | 25,0173 | IIIC | 20m Buffer |
| 5 | MID4 | 1 | A concentration of hornfels artefacts. The site demonstrates how artefacts deflate on the surface in that area. Finds include an MSA core, a retouched flake and a flake. | ~4-20/m ² | MSA | 31,56403 | 25,01582 | NCW | NA |
| 6 | MID5 | 1 | A concentration of hornfels artefacts. Finds include a couple of fragmented stone artefacts. | ~4-20/m ² | MSA | 31,56477 | 25,01668 | NCW | NA |
| 7 | MID6 | 1 | A small concentration of artefacts. Palimpsest of MSA and LSA artefacts | ~1-10/m ² | LSA/MSA | 31,56361 | 25,01593 | NCW | NA |
| 8 | MID7 | 1 | A small concentration of artefacts in a burrow. The site was disturbed by a bioturbation process most likely a mole rat activity. Finds include a carinated scraper and a retouched flake. | ~1-10/m ² | LSA | 31,56544 | 25,01777 | NCW | NA |
| 9 | MID8 | 1 | A concentration of Acheulean-Fauresmith artefacts eroding on the surface due to bioturbation. | ~4-20/m ² | later ESA | 31,56584 | 25,01717 | IIIB | Surface collection of key finds required |
| 10 | MID9 | 1 | A small concentration of weathered artefacts. Acheulean and Fauresmith bifaces and a uniface, mixed with some MSA like artefacts. | ~1-10/m ² | MSA | 31,56795 | 25,01868 | NCW | NA |
| 11 | MID10 | 1 | Small concentration of artefacts. The site was disturbed by a bioturbation process most likely a mole rat activity. Finds include a fragments and a retouched flake. | ~1-10/m ² | MSA-LSA | 31,56733 | 25,01776 | NCW | NA |
| 12 | MID11 | 1 | Levallois flake, probably the same site as MID8. A palimpsest of MSA-LSA | NA | MSA-late ESA | 31,56593 | 25,01734 | IIIB | Surface collectio |



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| | | | artefacts. | | | | | | n of key finds required |
|----|-------|---|---|----|------------|----------|----------|-----|-------------------------|
| 13 | MID12 | 2 | Historical structure, possibly a wall. | NA | Historical | 31,5569 | 25,01406 | IIC | 20m Buffer |
| 14 | MID13 | 2 | A weathered hornfels artefact. A flake with alternating retouch | NA | MSA-LSA | 31,55465 | 25,01301 | NCW | NA |
| 15 | MID14 | 2 | A weathered retouched flake. A retouched flake. | NA | MSA | 31,55295 | 25,01376 | NCW | NA |
| 16 | MID15 | 2 | A weathered flake | NA | MSA | 31,55875 | 25,01417 | NCW | NA |



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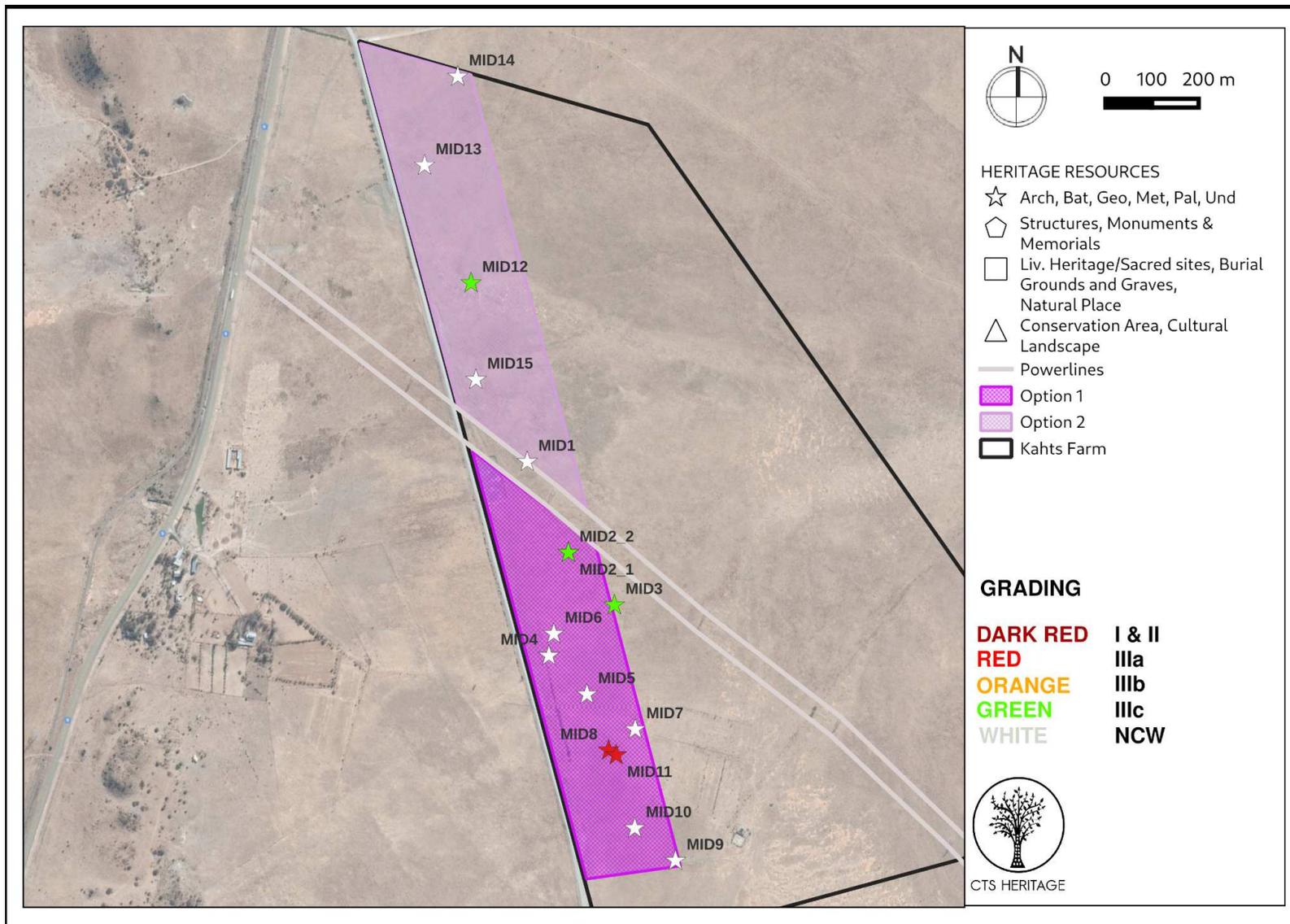


Figure 6.1: Map of field observations relative to the proposed development



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5. ASSESSMENT OF THE IMPACT OF THE DEVELOPMENT

5.1 Assessment of impact to Archaeological Resources

The survey proceeded with few constraints and limitations, and the project area was comprehensively surveyed for heritage resources. Sites and isolated individual artefacts were documented throughout the footprint of the two option areas for the potential development (Options 1 and 2). Archaeological sites were documented across Options 1 and 2, but are more frequent in the Option 1 area. Cumulatively these findings indicate cultural evidence for ESA, MSA, LSA, as well as later historical occupations of the area.

The majority of finds were identified in disturbed surface geoarchaeological contexts, and could not be tied chrono-culturally to a particular prehistoric period. However, several occurrences were relatively less affected by post-depositional processes and may have been exposed relatively recently. In addition, several sites had more typical MSA and ESA technological evidence including the relatively rare occurrence of a Fauresmith site with substantial artefacts in the southern area (Option 1), which should preferably be avoided entirely or should be properly mitigated prior to destruction.

Historical stone structures should be avoided, and a 5 meter buffer zone around the structures should be implemented where possible.

From a Stone Age archaeological perspective, no mitigation is recommended for the archaeology present in Option 2. However, if Option 1 is selected for development, several sites will require further mitigation, which will entail the collection and analysis of reflective samples of artefacts from the sites to be affected by the development. Given the variable extent of Stone Age sites such as MID11 and MID8 across the footprint, a buffering zone is unlikely to be an appropriate response measure to the conservation of the Stone Age sites identified as MODERATE in Option 1, and mitigation is recommended.

The documented Stone Age archaeology is classified as scientifically LOW SIGNIFICANCE in the Option 2 area, and of MODERATE SIGNIFICANCE in the Option 1 area.



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6. CONCLUSION AND RECOMMENDATIONS

The findings of the field assessment corroborate the findings of previous assessments in the broader area. Interestingly, archaeological resources of greater density and significance were identified in area Option 1 than in area Option 2 although it is acknowledged that the developer prefers Option 1. Should Option 1 proceed, the significant sites identified within this area (MID8 and MID11) will require mitigation interventions to limit the anticipated negative impact of the proposed development. Such mitigation intervention will require:

- Permission from SAHRA to conduct the mitigation interventions
- the formal scientific recording and collection of the artefacts located at the surface
- scientific and systematic excavation of these sites if deemed necessary by the archaeologist
- Archaeological monitoring of development activity in the vicinity of the finds by an archaeologist
- formal scientific write up of the findings for submission to SAHRA for approval

Should Option 2 proceed, no excavation mitigation is recommended however it is possible that significant archaeological heritage may be located beneath the ground surface and may be impacted by the proposed development.

Based on the findings of this assessment, there is no objection to the proposed development in principle on condition that the following recommendations are implemented:

- Option 2 is preferred from an archaeological perspective
- Should Option 2 be implemented, a 20m no-go buffer must be implemented around site MID12
- Should Option 1 be implemented, the mitigation recommended above must be implemented for sites MID8 and MID 11 including surface collection of artefacts and monitoring of development activities in the area
- Should Option 1 be implemented, a 20m no-go development buffer must be implemented around sites MID2_2 and MID3
- Should any previously unknown archaeological resources or human remains be uncovered during the course of construction activities, work must cease and SAHRA must be contacted immediately regarding a way forward.



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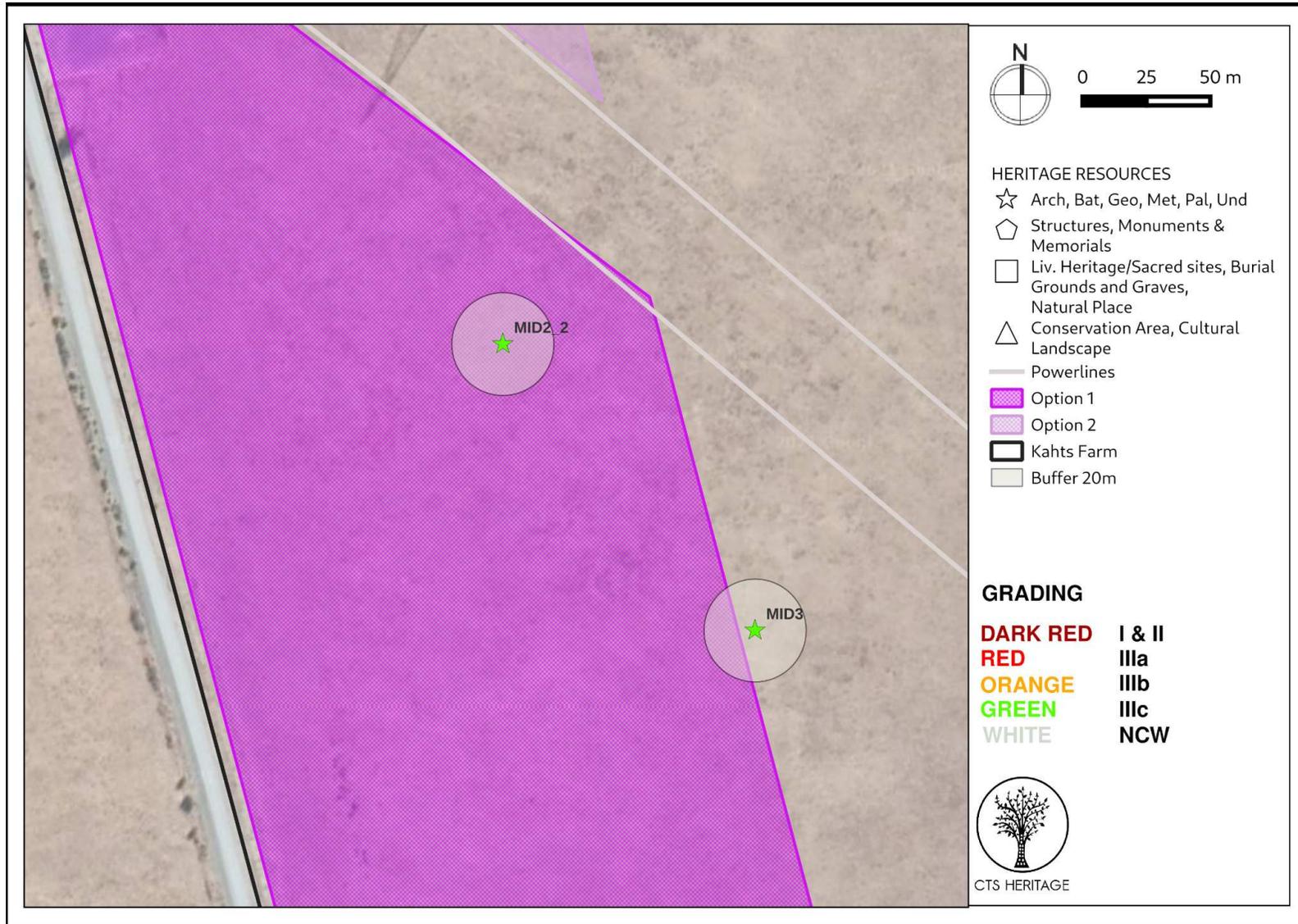


Figure 7.1: Map of heritage resources identified during the field assessment, with recommended 20m buffer - Option 1



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Figure 7.2: Map of heritage resources identified during the field assessment, with recommended 20m buffer - Option 2



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7. REFERENCES

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|-----------------------------|-------------|---|------------|---|
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| 384513 | AIA Phase 1 | Celeste Booth | 03/11/2012 | A PHASE 1 ARCHAEOLOGICAL IMPACT ASSESSMENT (AIA) FOR THE PROPOSED 75 MW COLLETT PHOTOVOLTAIC POWER STATION AND ASSOCIATED INFRASTRUCTURE AT COLLETT SUBSTATION, ON FARMS 335/0 AND FARM 180/0, NEAR MIDDLEBURG, EASTERN CAPE PROVINCE |
| 384514 | PIA Phase 1 | Robert Gess | 01/12/2012 | Palaeontological impact assessment for Proposed construction of a photovoltaic solar power station near Collett Substation, Middleburg, Eastern Cape |
| 6457 | AIA Phase 1 | Loudine Philip, C Koortzen, Zoe Henderson | 08/07/2008 | Assessment of Area of Proposed Construction, Operation and Maintenance of the Cypress Grove to Tafelberg Road (Chris Hani Magisterial District, Inxuba Yethemba Municipality, Eastern Cape) in Terms of Archaeological and Other Heritage Sites |