



**SOUTH AFRICA MAINSTREAM RENEWABLE
POWER DEVELOPMENTS (PTY) LTD**

**Graskoppies Wind Energy
Facility (WEF)**

Heritage Impact Report

Issue Date: 05 October 2017
Revision No.: 1

Project No.: 13622

Date:	05 10 2017
Document Title:	Heritage Impact Report
Author:	Wouter Fourie
Revision Number:	1
Checked by:	Andrea Gibb
For:	SiVEST Environmental Division

Executive Summary

PGS Heritage (Pty) Ltd 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 Graskoppies Wind Energy Facility for South Africa Mainstream Renewable Power Developments (Pty) Ltd, near Loeriesfontein 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 HSR completed in October 2016 has shown that the proposed Graskoppies site to be developed as a WEF may have heritage resources present on the property. This has been confirmed through archival research and evaluation of aerial photography of the sites.

The subsequent field work completed for the October 2016, has confirmed the presence of 7 heritage resources as well as several areas with existing infrastructure such as fenced off camps, windmills and reservoirs.

No identified heritage resources are affected by the proposed WEF layout and the following impact assessment tables are based on this fact.

The design process and methodology followed by the developer for this project will enabled the heritage assessment to provide input into the proposed layouts. This resulted in cognisance being taken of the positions of the heritage resources and thus the reduction of impacts at an early design phase

The mitigation measures proposed is a follows:

1.1 Pre-Construction

1. A walk down of the final layout to determine if any significant sites will be affected.
2. Monitor find spot areas if construction is going to take place through them.
3. A management plan for the heritage resources needs then to be compiled and approved for implementation during construction and operations. Possible surface collections for sites with a medium to high significance as well as conducting a watching brief by heritage practitioner during the construction phase.
4. Avoid the system of pans along the eastern border of the development area in the vicinity of GK006 and GK007.
5. Avoid the historical farmstead at GK001

1.2 Palaeontology

In Palaeontological terms the significance is rated as LOW (negative). Consequently, pending the discovery of significant new fossil material here, no further specialist studies are considered to be necessary.

However, should fossil remains be discovered during any phase of construction, either on the surface or exposed by fresh excavations, the ECO responsible for these developments should be alerted immediately. Such discoveries ought to be protected (preferably in situ) and the ECO should alert SAHRA (South African Heritage Research Agency) so that appropriate mitigation (e.g. recording, sampling or collection) can be taken by a professional palaeontologist.

The specialist involved would require a collection permit from SAHRA. Fossil material must be curated in an approved collection (e.g. museum or university collection) and all fieldwork and reports should meet the minimum standards for palaeontological impact studies developed by SAHRA.

1.3 Visual Impact

The VIA study concluded that the visual impact of the proposed Graskoppies Wind Farm is not significant enough to prevent the project from proceeding and that an EA should be granted. From a visual impact perspective, no visually sensitive receptors with tourism significance have been identified within the study area. A total number of seven (7) potentially sensitive visual receptors were however identified. These included scattered farmsteads / homesteads which house the local farmers as well as their farm workers. These dwellings are regarded as potentially sensitive visual receptors as they are located within a mostly rural setting and the proposed development will likely alter natural vistas experienced from these dwellings. In addition, the proposed development is expected to alter the largely natural / scenic character of the study area and contrast highly with the typical land use and/or pattern and form of human elements present as the study area is largely natural / scenic and untransformed. The visual impact of the proposed development on most the potentially sensitive visual receptors identified within the study area was rated as being medium. In addition, the proposed development would have a low visual impact on the Uitspankolk farmstead (VR 8)(5.5km northwest of the WEF), while the visual impact on the Bloupan farmstead (VR 18)(8.2km to the west of the WEF) is expected to be negligible from a visual perspective.

1.4 Cumulative Impact

It is my considered opinion that this additional load on the overall impact on heritage resources will be low. With a detailed and comprehensive regional dataset this rating could possibly be adjusted and more accurate.

MAINSTREAM RENEWABLE POWER DEVELOPMENTS (PTY) LTD
HERITAGE IMPACT REPORT

Contents	Page
EXECUTIVE SUMMARY	
1.1 Pre-Construction	2
1.2 Palaeontology	3
1.3 Visual Impact	3
1.4 Cumulative Impact	3
1 INTRODUCTION	1
1.1 Scope of the Study	1
1.2 Assumptions and Limitations	1
1.3 Specialist Qualifications	1
1.4 Legislative Context	2
2 TECHNICAL DETAILS OF THE PROJECT	7
2.1 Project Location	7
2.2 Wind Farm Technical details	7
2.3 Project Location	7
3 ASSESSMENT METHODOLOGY	8
3.1 Methodology for Assessing Heritage Site significance	8
4 BACKGROUND RESEARCH	9
4.1 Previous Studies	9
5 FIELD WORK FINDINGS	14
5.1 Methodology	14
5.2 Analysis of the cultural landscape	24
6 IMPACT ASSESSMENT	27
6.1 Impact matrix	29
6.2 Confidence in Impact Assessment	32
6.3 Cumulative Impacts	32
6.4 Reversibility of Impacts	35
7 CONCLUSIONS AND RECOMMENDATIONS	35
7.1 Pre-Construction	36
7.2 Palaeontology	36
7.3 Visual Impact	36
7.4 Cumulative Impact	37
8 REFERENCES	37

Appendices

- A: LEGISLATIVE PRINCIPLES
- B: HERITAGE IMPACT ASSESSMENT METHODOLOGY
- C: IMPACT ASSESSMENT MATRIX
- D: PALAEOLOGICAL DESKTOP ASSESSMENT

1 INTRODUCTION

PGS Heritage (Pty) Ltd (PGS) was appointed by SIVEST Environmental Division to undertake a Heritage Impact Assessment (HIA) that forms part of the Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) for the Graskoppies Wind Energy Facility for South Africa Mainstream Renewable Power Developments (Pty) Ltd, near Loeriesfontein in the Northern Cape Province.

1.1 Scope of the Study

The aim of the study is to identify possible heritage resources, finds and sensitive areas that may occur in the study area to inform the EIA in the development of a comprehensive EMP 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 Assumptions and Limitations

Not detracting 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 development area. Various factors account for this, including the subterranean nature of some archaeological sites. 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.

1.3 Specialist Qualifications

PGS Heritage (PGS) compiled this HIA.

The staff at PGS has a combined experience of nearly 80 years in the heritage consulting industry. PGS and its staff have extensive experience in managing the HIA processes. PGS will only undertake heritage assessment work where they have the relevant expertise and experience to undertake that work competently.

Wouter Fourie, author and project manager for this project, is registered as a Professional Archaeologist with the Association of Southern African Professional Archaeologists (ASAPA) and has CRM accreditation within the said organisation, as well as being accredited as a Professional Heritage Practitioner with the Association of Professional Heritage Practitioners – Western Cape (APHP)

Jessica Angel holds a Masters degree in Archaeology and is registered as a Professional Archaeologist with the Association of Southern African Professional Archaeologists (ASAPA).

CLIENT NAME: South Africa Mainstream Renewable Power Developments (Pty) Ltd

prepared

by: PGS for SIVEST

Project Description: Graskoppies WEF

Revision No. 2

10 October 2017

Page 1 of 90

Marko Hutten, heritage specialist and project archaeologist, has 18 years of experience in the industry and is registered with the Association of Southern African Professional Archaeologists (ASAPA) as a Professional Archaeologist and is accredited as a Field Director.

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:

- National Environmental Management Act (NEMA), Act 107 of 1998
- National Heritage Resources Act (NHRA), Act 25 of 1999
- Mineral and Petroleum Resources Development Act (MPRDA), Act 28 of 2002

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

- 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 Impact Assessment (EIA) – Section (32)(2)(d)
 - d. Environmental Management Plan (EMP) – Section (34)(b)
- 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
- Mineral and Petroleum Resources Development Act (MPRDA) Act 28 of 2002
- Section 39(3)

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 NHRA is utilised as the basis for the identification, evaluation and management of heritage resources and in the case of CRM those resources specifically impacted on by development as stipulated in Section 38 of NHRA, and those developments administered through NEMA and MPRDA legislation. In the latter cases, the feedback from the relevant heritage resources authority is required by the State and Provincial Departments managing these Acts before any authorizations are granted for development. The last few years have seen a significant change towards the inclusion of heritage assessments as a major component of Environmental Impacts Processes required by NEMA and MPRDA. This change requires us to evaluate the Sections of these Acts relevant to heritage.

The NEMA 23(2)(b) states that an integrated environmental management plan should, “...identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage”.

A study of subsections (23)(2)(d), (29)(1)(d), (32)(2)(d) and (34)(b) and their requirements reveals the compulsory inclusion of the identification of cultural resources, the evaluation of the impacts of the proposed activity on these resources, the identification of alternatives and the management procedures for such cultural resources for each of the documents noted in the Environmental Regulations. A further important aspect to be taken account of in the Regulations under NEMA is the Specialist Report requirements laid down in Section 33 of the regulations (Fourie, 2008).

Refer to **Appendix A** for further discussions on heritage management and legislative frameworks

Table 1: Terminology

Acronyms	Description
AIA	Archaeological Impact Assessment
ASAPA	Association of South African Professional Archaeologists
CI	Cumulative Impacts
CRM	Cultural Resource Management
DEA	Department of Environmental Affairs
EIA practitioner	Environmental Impact Assessment Practitioner
EIA	Environmental Impact Assessment
ESA	Earlier Stone Age
GPS	Global Positioning System
HIA	Heritage Impact Assessment
I&AP	Interested & Affected Party
LSA	Later 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
WEF	Wind Energy Facility

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 a 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

Earlier Stone Age

The archaeology of the Stone Age, between 700 000 and 2 500 000 years ago.

Fossil

Mineralised bones of animals, shellfish, plants and marine animals. A trace fossil is the track or footprint of a fossil animal that is preserved in stone or consolidated sediment.

Heritage

That which is inherited and forms part of the National Estate (historical places, objects, fossils as defined by the National Heritage Resources Act 25 of 1999).

Heritage resources

This means any place or object of cultural significance, such as the caves with archaeological deposits identified close to both development sites for this study.

Holocene

The most recent geological time period which commenced 10 000 years ago.

Later Stone Age

The archaeology of the last 30 000 years associated with fully modern people.

Late Iron Age (Early Farming Communities)

The archaeology of the last 1000 years up to the 1800's, associated with iron-working and farming activities such as herding and agriculture.

Middle Stone Age

The archaeology of the Stone Age between 30 000-300 000 years ago, associated with early modern humans.

Palaeontology

Any fossilised remains or fossil trace of animals or plants which lived in the geological past, other than fossil fuels or fossiliferous rock intended for industrial use, and any site which contains such fossilised remains or trace.

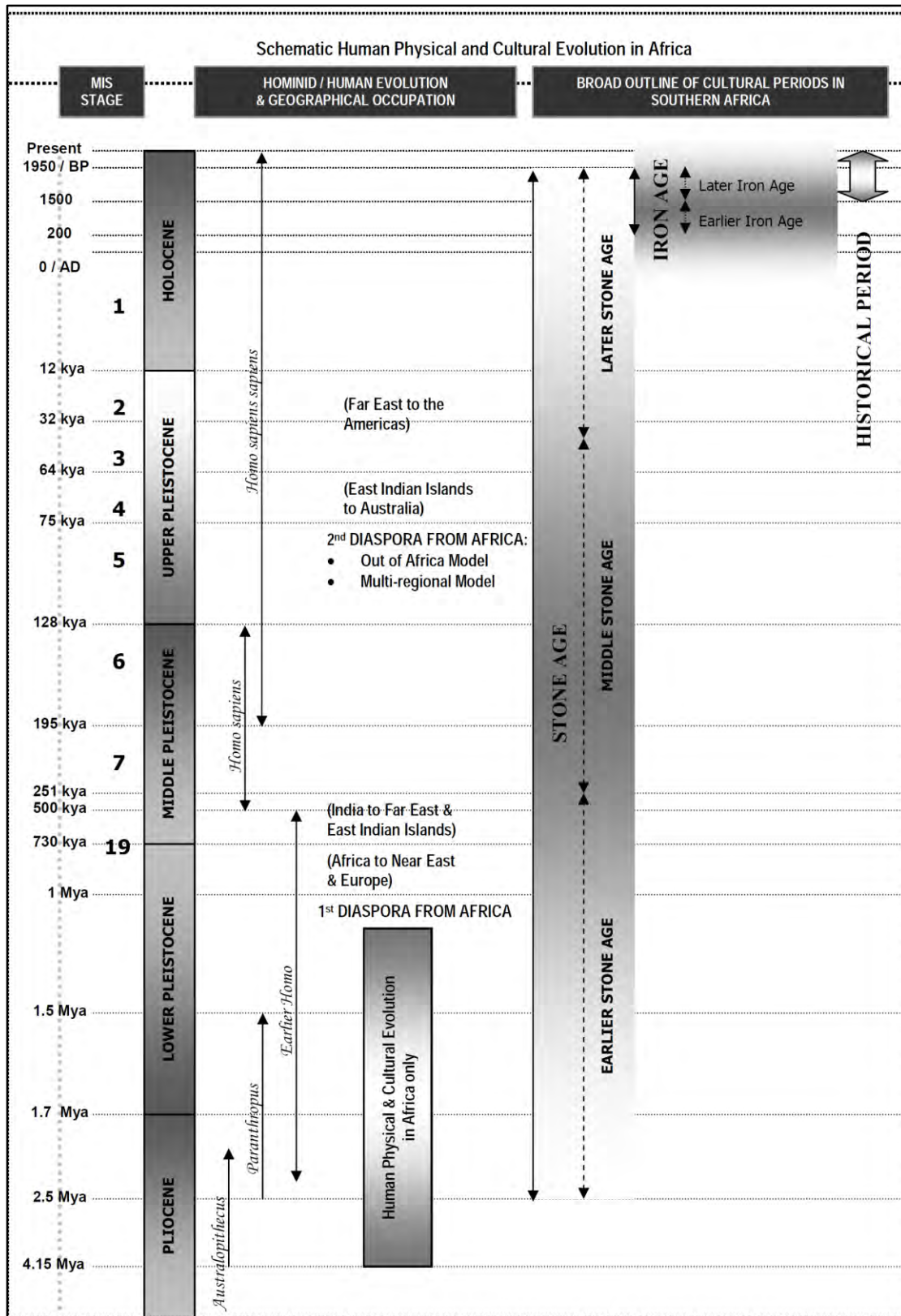


Figure 1: Human and Cultural Timeline in Africa (Morris, 2008)

2 TECHNICAL DETAILS OF THE PROJECT

2.1 Project Location

The proposed Leeuwberg Wind Farm project of which the Graskoppies WEF is part, will be located approximately 62km north of Loeriesfontein, within Khaima and Hantam Local Municipalities within the Northern Cape Province. The proposed project is located on the following property:

- Portion 2 of Graskoppies No.176
- Portion 1 of Hartebeesleegte No.216

2.2 Wind Farm Technical details

The key technical details and infrastructure required is presented in the table below (Table 2).

Table 2: Graskoppies WEF summary

Project Name	DEA Reference	Farm name and area	Technical details and infrastructure necessary for the proposed project
Graskoppies WEF	To be announced	<ul style="list-style-type: none"> ▪ Portion 2 of Graskoppies No.176 ▪ Portion 1 of Hartebeesleegte No.216 	<ul style="list-style-type: none"> ▪ Total export capacity of up to 140MW. ▪ Wind turbines will therefore have a hub height of up to 160m and a rotor diameter of up to 160m ▪ 132kV on site Graskoppies IPP Substation ▪ The turbines will be connected via medium voltage cables to the proposed 132kV onsite Graskoppies IPP Substation. ▪ Internal access roads are proposed to be between 4m to 6m wide. ▪ A temporary construction lay down area. ▪ A hard standing area / platform per turbine. ▪ The operations and maintenance buildings, including an on-site spares storage building, a workshop and an operations building. ▪ Fencing (if required) will be up to 5m where required and will be either mesh or palisade.

2.3 Project Location

The proposed Graskoppies WEF and substation will be located on the Portion 2 of Graskoppies No.176 and Portion 1 of Hartebeesleegte No.216 which occurs approximately 62km north of

locating and documenting sites falling within and adjacent to the proposed development footprint. *Completed end of October 2016.*

3.1.2 Impact Assessment Phase

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

Appendix B, outlines the Heritage Impact Assessment methodology, while **Appendix C** provides the guidelines for the impact assessment evaluation that will be done during the EIA phase of the project.

4 BACKGROUND RESEARCH

The examination of heritage databases, historical data and cartographic resources represents a critical additional tool for locating and identifying heritage resources and in determining the historical and cultural context of the study area. Therefore, an Internet literature search was conducted and relevant archaeological and historical texts were also consulted. Relevant topographic maps and satellite imagery were studied.

4.1 Previous Studies

Researching the SAHRA APM Report Mapping Project records and the SAHRIS online database (<http://www.sahra.org.za/sahris>), it was determined that a number of other archaeological or historical studies have been performed within the wider vicinity of the study area. Previous studies listed for the area in the APM Report Mapping Project included a number of surveys within the area listed in chronological order below:

- MORRIS, DAVID. 2007. Archaeological Specialist input with respect to the upgrading railway infrastructure on the Sishen-Saldanha ore line in the vicinity of Loop 7a near Loeriesfontein. McGregor Museum.
- FOURIE, WOUTER. 2011. Heritage Impact Assessment for the proposed Solar Project on the farm Kaalspruit, Loeriesfontein. PGS Heritage and Grave Relocation Consultants.
- ALMOND, J.E. 2011. Palaeontological Desktop Study for the Proposed Mainstream Wind Farm Near Loeriesfontein, Namaqua District Municipality, Northern Cape Province.
- VAN SCHALKWYK, J. 2011. Heritage Impact Assessment for the proposed establishment of a wind farm and PV facility by Mainstream Renewable Power in the Loeriesfontein Region, Northern Cape Province.
- VAN DER WALT, JACO. 2012. Archaeological Impact Assessment for the proposed Hantam PV Solar Energy Facility on the farm Narosies 228, Loeriesfontein, Northern Cape Province.

- WEBLEY, L & HALKETT, D. 2012. Heritage Impact Assessment: Proposed Loeriesfontein Photo-Voltaic Solar Power Plant On Portion 5 of the Farm Klein Rooiberg 227, Northern Cape Province.
- MORRIS, DAVID. 2013. Specialist Input for the Environmental Basic Assessment and Environmental Management Program for the Khobab Wind Energy Facility: Power Line Route Options, Access Road And Substation Positions.
- ORTON, JAYSON. 2014. Heritage Impact Assessment for the proposed re-alignment of the authorized 132kV Power Line for the Loeriesfontein 2 WEF, Calvinia Magisterial District, Northern Cape.

4.1.1 Findings from the studies

Palaeontology

The following section has been compiled by Elize Butler for PGS Heritage. The full report can be viewed in **Appendix D** of this report.

The development footprint is underlain by the Permo-Carboniferous Dwyka Group and Early to Middle Permian basinal rocks of the lower part of the Eccca Group (Karoo Supergroup). They are assigned to the Prince Albert Formation, Whitehill Formation and Tierberg Formation in order of decreasing age. The Eccca Group were laid down within the marine to freshwater Eccca Sea.

These mudrocks are generally weathered, and creates landscapes of low relief. The Eccca Group sediments, particularly the Whitehill Formation, are intruded by Early Jurassic (183 ± 2 Million years old) igneous intrusions of the Karoo Dolerite Suite (Duncan & Marsh 2006). The basic sills thermally metamorphosed or baked the adjacent Eccca country rocks. In many areas the Permian and Jurassic bedrocks are mantled with a variety of superficial deposits, most of which is probably of Late Caenozoic (Quaternary to Recent) age. This include doleritic surface rubble, gravelly to silty river alluvium and pan sediments and small patches of aeolian (i.e. wind-blown) sands. The intrusive Karoo dolerites are of no direct palaeontological significance and the Late Caenozoic superficial deposits are generally of very low palaeontological sensitivity.

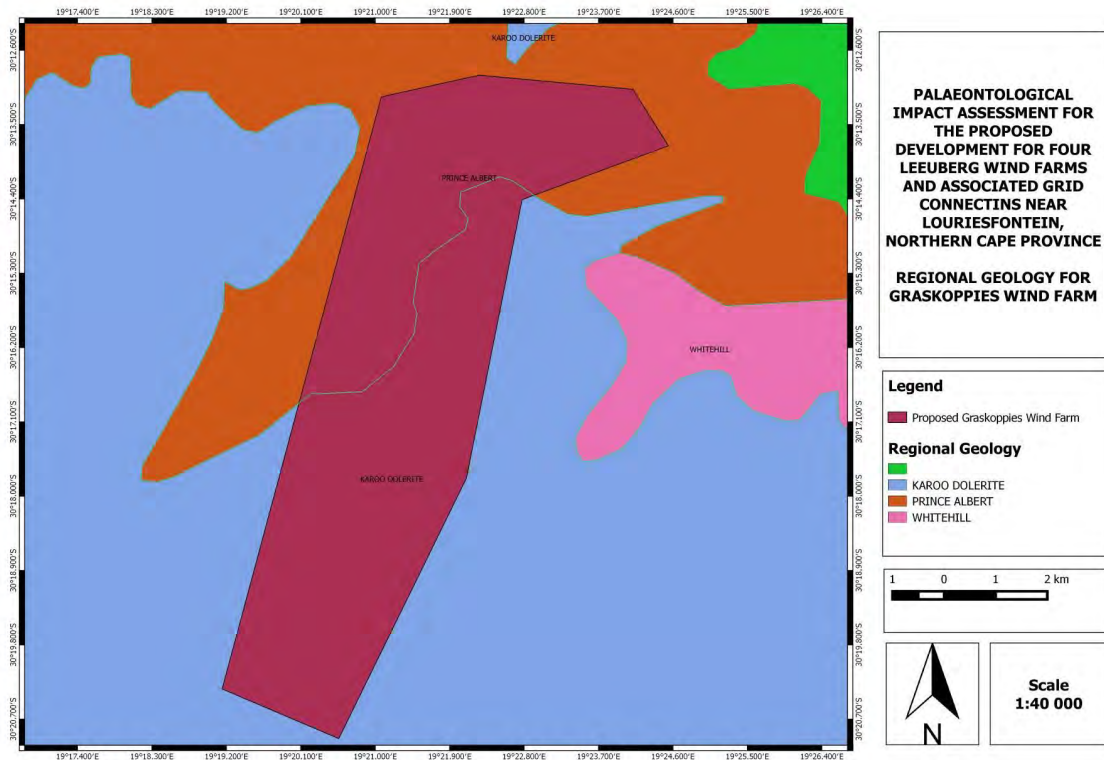


Figure 3: The surface geology of the proposed Graskoppies Wind Farm near Loeriesfontein in the Northern Cape Province. The development footprint is underlain by Karoo Dolerite as well as the Prince Albert and Whitehill Formations of the Ecca Group.

Archaeology

Although a study conducted by Morris (2007) have indicated minimal finds of archaeological sites in the vicinity of the upgrade of Loop 7A of the Sishen-Saldanha ore line to the north of the study area, discussions with local framers have indicated the occurrence of some archaeological sites.

Morris (2010) notes that previous studies have indicated that substantial MSA scatters is fairly uncommon in the Bushmanland/Namaqualand areas. While herder sites where more limited to sheltered and dune areas close to water sources such as pans and rivers.

The HIA's (Fourie, 2011; Van Schalkwyk, 2011; Webley & Halkett, 2012 and Orton, 2014) and the AIA's (Morris, 2007; Van der Walt, 2012 and Morris, 2013), have added to the body of work conducted in the area since the observations of Beaumont et al. (1995), that "thousands of square kilometres of Bushmanland area covered by a low density lithic scatter".

Orton (2014) notes that previous studies in the vicinity of the current study area, have found and assessed archaeological material dating to the early (ESA), Middel (MSA) and Later (LSA) Stone Ages.

4.1.2 Historical structures and history

The farms Hartebeeslaagte 216 and Graskoppies 176 were surveyed and proclaimed in 1911 and 1899 respectively. No structures are indicated on the original survey diagrams (**Figure 4** and **Figure 5**).

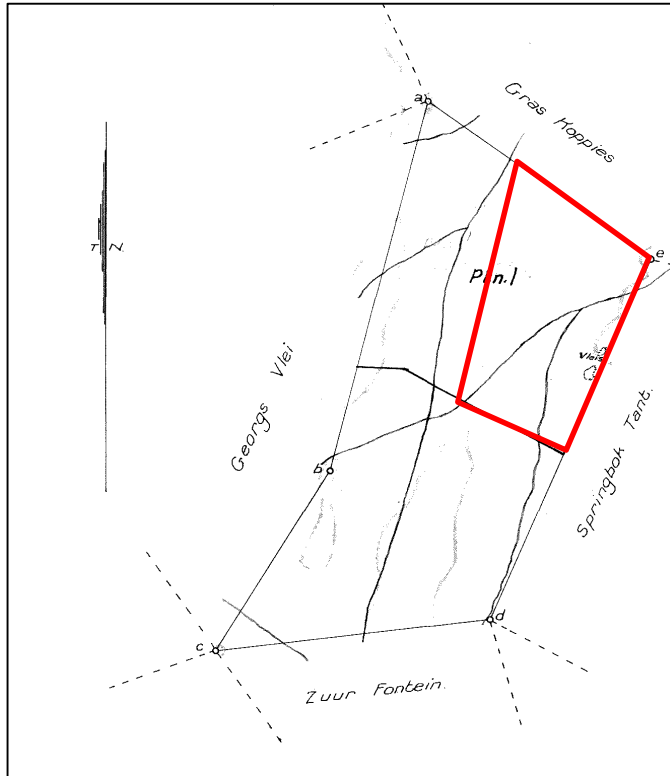


Figure 4: SG Diagram of Hartebeeslaagte 216, c.1911

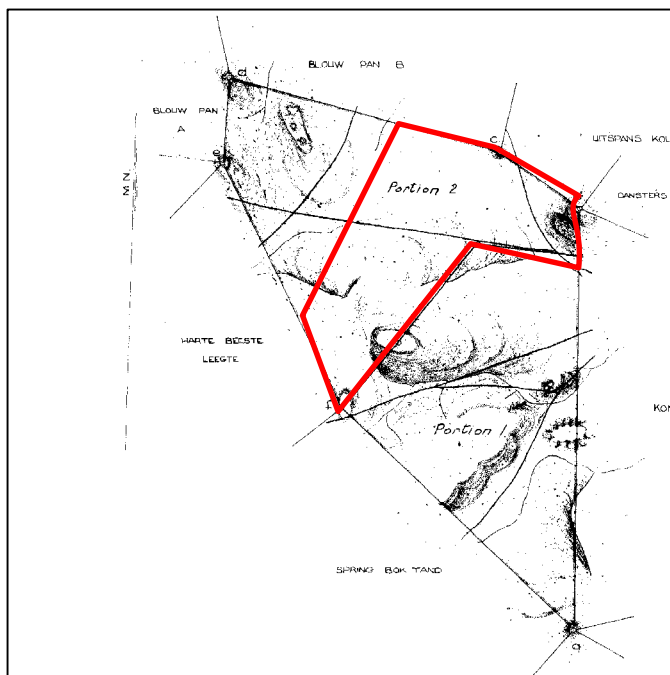


Figure 5: SG Diagram of Graskoppies 176, c.1899

4.1.3 Heritage sensitivities

The evaluation of the possible heritage resource finds and their heritage significance linked to mitigation requirements was linked to types of landscape. The heritage sensitivity rating does not indicate no-go areas but the possibility of finding heritage significant site that could require mitigation work.

4.1.4 Possible finds

Evaluation of aerial photography has indicated that certain areas may be sensitive from an archaeological perspective. The analysis of the studies conducted in the area assisted in the development of the following landform type to heritage find matrix in Table 3.

Table 3: Landform to heritage matrix

LAND FORM TYPE	HERITAGE TYPE
Crest and foot hill	LSA and MSA scatters
Crest of small hills	Small LSA sites – scatters of stone artefacts, ostrich eggshell, pottery and beads
Pans	Dense LSA sites
Outcrops	Occupation sites dating to LSA
Farmsteads	Historical archaeological material

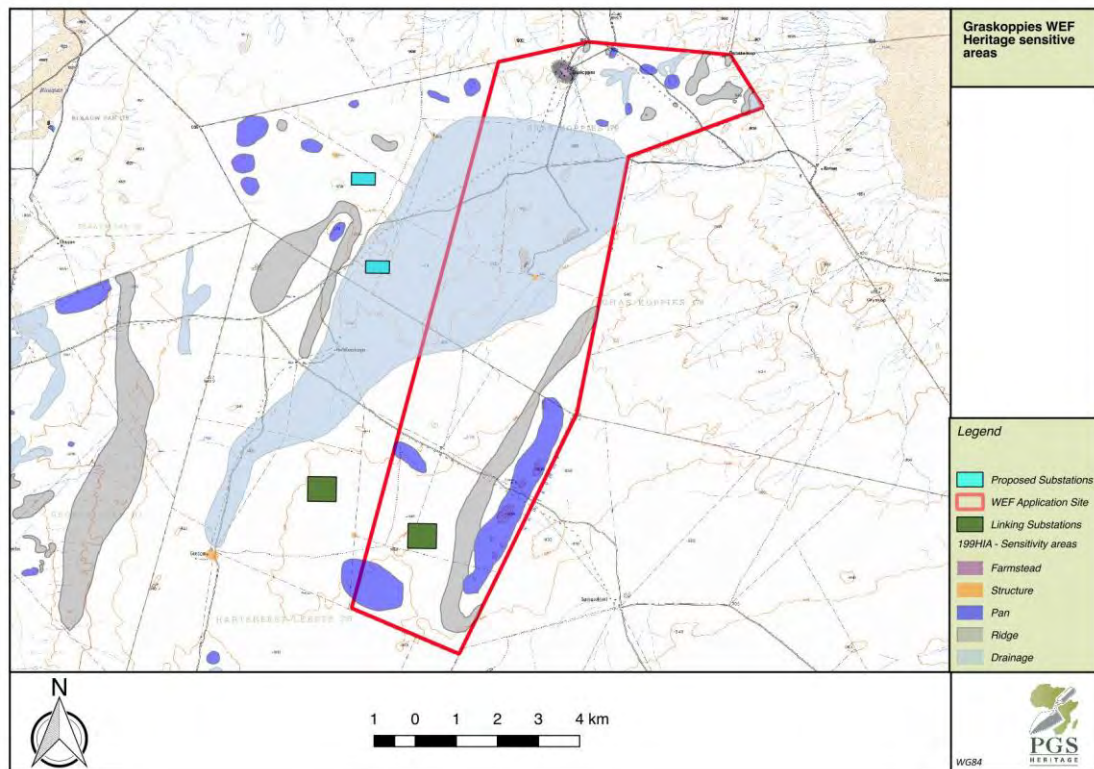


Figure 6: Possible heritage sensitive areas

5 FIELD WORK FINDINGS

5.1 Methodology

A survey of the study area was conducted from 24-30 October 2016. Due to the nature of cultural remains, with the majority of artefacts occurring below surface, two archaeologists of PGS conducted a vehicle and foot-survey that covered the study area. The fieldwork was logged with a GPS to provide a background of the areas covered (Figure 9).

The proposed study area is situated approximately 75 kilometres north of Loeriesfontein off the R355 in the Northern Cape.

The proposed site is characterised by thick alluvial deposits and pans along a ridge. The vegetation is typical Karoo. The area is being utilized for game (mostly springbok) and sheep. It seems seasonal transhumance occurs in the area, with the farms in the study area being utilized during the summer after the rains.



Figure 7: View of the eastern side of the site where a series of pans occur



Figure 8: View of the northern side of the site showing Karoo vegetation and rocky outcrops

The fieldwork identified 7 heritage resources as well as several areas with existing infrastructure such as fenced off camps, windmills and reservoirs.

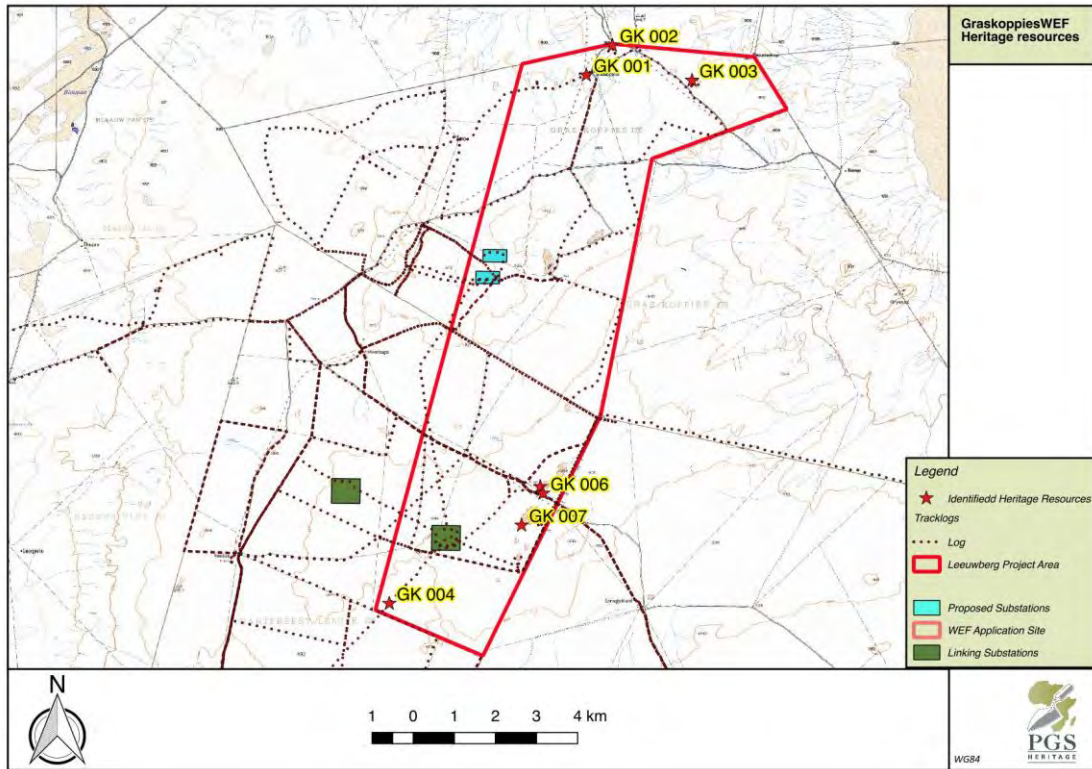


Figure 9: Heritage resources with tracklog

Table 4: Heritage resources found						
Site Number	Lat	Lon	Type Find	Description	Significance	Heritage Rating
GK 001	S30.221878°	E19.365235°	Historic structure	<p>The farmstead is situated in the very northern section of the study area. Several other structures and sheep pens occur around the main house which is probably over 60 years old. The structure is multi roomed and the outer walls have been painted in the recent past. Currently the house is not occupied.</p> <p>The house has a corrugated iron pitched roof, which extends over a veranda situated on two sides of the house. It has a gable on the one side which is masking the one end of the pitched roof. The house was built with brick and cement and it has wooden doors with wooden doorframes and metal window frames. A fireplace and a chimney are situated at the back of the house and they most probably formed part of the kitchen. External plumbing was added at a later stage as basins, baths and taps were placed inside the house. The house does not have any electrical connections or wiring.</p> <p>A large shed or storeroom is situated within 50m south of the main house. Another small storeroom is also situated near the main house. A fenced kraal or enclosure with a drinking trough for sheep is also situated within proximity of the house. Several discarded metal and wood artefacts were identified on and around an old wagon to the south of the house.</p> <p>The resource is graded as of medium local heritage significance. The site is probably older than 60 years and protected under section 34 of the NHRA. It is recommended that the development be done in such a way as to avoid the farmstead.</p>	Medium	GP.B





Table 4: Heritage resources found							
Site Number	Lat	Lon	Type Find	Description	Significance	Heritage Rating	
				 <p>Figure 10: View of farm house at GK 001</p>	 <p>Figure 11: View of secondary structures at GK 001</p>	 <p>Figure 12: View of the back side of the main house at GK 001</p>	 <p>Figure 13: View of other secondary structures at GK 001</p>
GK 002	S30.215380°	E19.370933°	Find spot	<p>A low density scatter of lithic tools was identified at this location (\pm 2-5 artefacts in 10m x10m). The site is situated within a clearing at the foot of a series of small rocky hills. The artefacts were exposed in some deflated areas due to some measure of sheet erosion. The lithic tools are mainly from the Late Stone Age (LSA) and consist mostly of utilised and re-touched flakes, scrapers, blades and cores. The artefacts are mainly made of weathered quartzite, hornfels and CCS and they were found scattered over an area which measured approximately 40m in diameter.</p> <p>Situated at the base of a rocky out crop, this site also yielded ostrich eggshell (OES)</p> <p>The site is of a low significance and no further mitigation is necessary.</p>	Low	GP.C	

Table 4: Heritage resources found





Site Number	Lat	Lon	Type Find	Description	Significance	Heritage Rating
				   		
				<p>Figure 14: View of rocky outcrop at GK 002</p> <p>Figure 15: View of general landscape around GK 002</p> <p>Figure 16: View between two rocky outcrops where most artefacts were located at GK 002</p> <p>Figure 17: Artefacts and OES located at GK 002</p>		
GK 003	S30.223029°	E19.388351°	Find spot	<p>A low/medium density scatter of lithic tools was identified at this location (\pm 5-10 artefacts in 10m x10m). The site is situated right on the edge of a pan and also extends within the pan itself. The artefacts were identified from the barren surface of the dry pan and they vary between stone tools from the Middle Stone Age (MSA) and the Late Stone Age (LSA) and consist mostly of utilised and re-touched flakes, scrapers, blades and cores. The artefacts are mainly made of weathered quartzite, hornfels and CCS. The artefacts were found scattered over an area which measured approximately 60m in diameter.</p> <p>The site is of low significance and no further mitigation is required.</p> <p>However it must be noted that as pans represent seasonal water sources, there are very often concentrations of archaeological resources in close proximity as can be seen at GK 003, GK 006 and GK 007. Pans are considered heritage sensitive areas and should be avoided where possible.</p>	Low	GP.C




Table 4: Heritage resources found						
Site Number	Lat	Lon	Type Find	Description	Significance	Heritage Rating
 <p>Figure 18: View of the pan at GK 003</p>			 <p>Figure 19: View of the pan at GK 003</p>		 <p>Figure 20: Low density scatter found at GK 003</p>	
Site Number	Lat	Lon	Type Find	Description	Significance	Heritage Rating
GK 004	S30.337503°	E19.322171°	Old well	<p>An old well was identified at this location. The well is situated within the grassy undulating plains of the study area. It is situated at the bottom of a low ridge running from east to west. The well measures approximately 2m in diameter, but it could not be determined how deep it is as it was filled up with various pieces of junk. The excavated material from the well was placed in a fringe around the well. The amount of excavated material around the well suggests that the well must have been significantly deep. This fringe of gravel and excavated material measures approximately 12m in diameter.</p> <p>The site has low significance and no further mitigation measures are necessary</p>	Low	GP.C




Table 4: Heritage resources found						
Site Number	Lat	Lon	Type Find	Description	Significance	Heritage Rating
 <p>Figure 21: General view at GK 004</p>			 <p>Figure 22: Well identified at GK 004</p>		 <p>Figure 23: Close up of well at GK 004 showing depth</p>	
GK 005	S30.311959°	E19.355189°	Structure	<p>Two rock built structures occur at this location. The structures may have been associated with water utilization and animals in the past. The smaller structure occurs against the rock face on the western side of the pan and the larger square structure (about 20x20 m) occurs within the water tributary area below a reservoir.</p> <p>The significance is low and now further mitigation will be necessary.</p> <p>However, it must be noted that as pans represent seasonal water sources, there are very often concentrations of archaeological resources in close proximity as can be seen at GK 003, GK 006 and GK 007. Pans are considered heritage sensitive areas and should be avoided where possible.</p>	Low	4C




Table 4: Heritage resources found							
Site Number	Lat	Lon	Type Find	Description	Significance	Heritage Rating	
				 <p>Figure 24: View of small stone walled structure against western rock face at GK 005</p>	 <p>Figure 25: View of larger stone walled structure at the tributary entrance to the pan</p>	 <p>Figure 26: Collapsed wall within the larger stone walled structure at GK 005</p>	
GK 006	S30.313405°	19.355774°E	Stone Age Site	<p>At this location, a high-density scatter of LSA material was found. The site occurred in thick alluvial deposit that has been exposed due to gully erosion. There are large concentrations of OES and CCS artefacts which have been exposed.</p> <p>This site is of high significance and should be avoided. Alternatively, further mitigation measures will need to be followed which include a full excavation to collect and analyse the recovered artefacts and conduct full documentation of the site.</p>	High	GP.A	








Table 4: Heritage resources found						
Site Number	Lat	Lon	Type Find	Description	Significance	Heritage Rating
				 <p>Figure 27: View of GK 006 looking towards the pan.</p>	 <p>Figure 28: GK 006 showing the scattered artefacts and OES exposed in the alluvial deposits</p>	 <p>Figure 29: GK 006 artefacts collected.</p>
GK 007	S30.320373°	E19.351093°	Stone Age Site	<p>This site is located at the largest of the series of pans which occur on the eastern side of Grasskoppies. All around the pan were scatters of artefacts. However, the highest concentrations occur within the thicker alluvial deposit blown into the tributaries that enter the pan.</p> <p>This site is of high significance and should be avoided. Alternatively, further mitigation measures will need to be followed which include a full excavation to collect and analyse the recovered artefacts and conduct full documentation of the site.</p>	High	GP.A

Table 4: Heritage resources found						
Site Number	Lat	Lon	Type Find	Description	Significance	Heritage Rating
				 <p>Figure 30: View of alluvial deposit within the tributary leading to the pan at GK 007</p>		
				 <p>Figure 31: View of the northern side of the pan at GK 007 showing exposed rocks and artefacts</p>		
				 <p>Figure 32: Close up view of deposits showing exposed artefacts at GK 007</p>		
				 <p>Figure 33: OES and CCS LSA artefacts located around the pan at GK 007</p>		

5.2 Analysis of the cultural landscape

This section is extracted from the Visual Impact Assessment (VIA) completed by Gibb and Jacobs (2017) for the Graskoppies WEF.

5.2.1 Landuse

Sheep farming is the dominant activity in the study area although the arid nature of the climate restricts stocking densities which has resulted in relatively large farms across the area (**Figure 34**). The study area is therefore sparsely populated, and human-related infrastructure is largely restricted to isolated farmsteads and gravel access roads. The area is regarded as largely uninhabited and the closest built up area is the small town of Loeriesfontein approximately 68km to the south of the site.



Figure 34: Sheep farming dominating the area

It should be noted that the study area is also characterised by the presence of certain pastoral elements (**Figure 35**). These elements can be found throughout the study area and are typically present in areas where sheep farming is taking place.



Figure 35: An example of typical pastoral elements in the study area

5.2.2 *Visual character*

The above physical and land use-related characteristics of the study area contribute to its overall visual character. Visual character can be defined based on the level of change or transformation from a completely natural setting, which would represent a natural baseline in which there is little evidence of human transformation of the landscape. Varying degrees of human transformation of a landscape would engender differing visual characteristics to that landscape, with a highly modified urban or industrial landscape being at the opposite end of the scale to a largely natural undisturbed landscape. Visual character is also influenced by the presence of built infrastructure including buildings, roads and other objects such as telephone or electrical infrastructure.

The majority of the study area is considered to have a natural (almost vacant) visual character as natural shrub land prevails throughout the site and there is minimal human habitation and associated infrastructure. In addition, the predominant land use (sheep farming) has not transformed the natural landscape and the area has thus largely retained its natural rural character. It should however be noted that the study area is also characterised by the presence of certain pastoral elements, which are expected to give the surrounding area a more pastoral feel. As mentioned above, built infrastructure within the proposed site is limited to isolated farmhouses, gravel farm roads and farm boundary fences. In addition, quarrying activities are taking place on the eastern edge of 'Konnese Pan', which is located to the north-east of the proposed Xha! Boom wind application site. This pan is however located outside of the visual

assessment zone and as such, the quarrying activities are also taking place outside of the visual assessment zone. There is therefore there no significant instance of transformation in the study area.

The greater area surrounding the proposed development site is an important component when assessing visual character. The area can be considered to be typical of a Karoo or “platteland” landscape that would characteristically be encountered across the high-lying dry western and central interior of South Africa. Much of South Africa’s dry Karoo interior consists of wide open, uninhabited spaces sparsely punctuated by widely scattered farmsteads and small towns. Traditionally the Karoo has been seen by many as a dull, lifeless part of the country that was to be crossed as quickly as possible on route between the major inland centres and the Cape coast, or between the Cape and Namibia.

However, in the last couple of decades this perception has been changing, with the launching of tourism routes within the Karoo, and the promotion of tourism in this little visited, but large part of South Africa. In a context of increasing urbanisation in South Africa’s major centres, the Karoo is being marketed as an undisturbed getaway, especially as a stop on a longer journey from the northern parts of South Africa to the Western and Eastern Cape coasts.

The typical Karoo landscape can also be considered a valuable ‘cultural landscape’ in the South African context. Although the cultural landscape concept is relatively new, it is becoming an increasingly important concept in terms of the preservation and management of rural and urban settings across the world (Breedlove, 2002).

Cultural Landscapes can fall into three categories (according to the Committee's Operational Guidelines):

- i) "a landscape designed and created intentionally by man";
- ii) an "organically evolved landscape" which may be a "relict (or fossil) landscape" or a "continuing landscape";
- iii) an "associative cultural landscape" which may be valued because of the "religious, artistic or cultural associations of the natural element"

The typical Karoo landscape consisting of wide open plains, and isolated relief, interspersed with isolated farmsteads, windmills and stock holding pens, is an important part of the cultural matrix of the South African environment. The Karoo farmstead is also a representation of how the harsh arid nature of the environment in this part of the country has shaped the predominant land use and economic activity practiced in the area, as well as the patterns of human habitation and interaction. The presence of small Karoo towns, such as Loeriesfontein, engulfed by an otherwise rural environment, form an integral part of the wider Karoo landscape. As such, the Karoo landscape as it exists today has value as a cultural landscape in the South African context. In the context of the types of cultural landscape listed above, the Karoo cultural landscape would fall into the second category, that of an organically evolved, “continuing” landscape.

The study area, as visible to the viewer, represents a typical Karoo cultural landscape. This is important in the context of potential visual impacts associated with the proposed development

of a wind farm as introducing this type of development could be considered to be a degrading factor in the context of the natural Karoo character of the study area.

5.2.3 Findings

The VIA study concluded that the visual impact of the proposed Graskoppies Wind Farm is not significant enough to prevent the project from proceeding and that an EA should be granted. From a visual impact perspective, no visually sensitive receptors with tourism significance have been identified within the study area. A total number of seven (7) potentially sensitive visual receptors were however identified. These included scattered farmsteads / homesteads which house the local farmers as well as their farm workers. These dwellings are regarded as potentially sensitive visual receptors as they are located within a mostly rural setting and the proposed development will likely alter natural vistas experienced from these dwellings. In addition, the proposed development is expected to alter the largely natural / scenic character of the study area and contrast highly with the typical land use and/or pattern and form of human elements present as the study area is largely natural / scenic and untransformed. The visual impact of the proposed development on most the potentially sensitive visual receptors identified within the study area was rated as being medium. In addition, the proposed development would have a low visual impact on the Uitspankolk farmstead (VR 8)(5.5km northwest of the WEF), while the visual impact on the Bloupan farmstead (VR 18)(8.2km to the west of the WEF) is expected to be negligible from a visual perspective.

Recommended mitigation measures include:

- Carefully plan to reduce the construction period.
- Minimise vegetation clearing and rehabilitate cleared areas as soon as possible.
- Maintain a neat construction site by removing rubble and waste materials regularly.
- Make use of existing gravel access roads where possible.
- Due to the fact that the access roads are to be used infrequently by internal contractors, dust suppression may not be viable in the long term. The developer should consider making use of a tarred construction road or a road with less chance of generating dust.
- All reinstated cable trenches should be re-vegetated with the same vegetation that existed prior to the cable being laid.

6 IMPACT ASSESSMENT

The proposed WEF layout in relation to the identified heritage resources is shown in **Figure 36**.

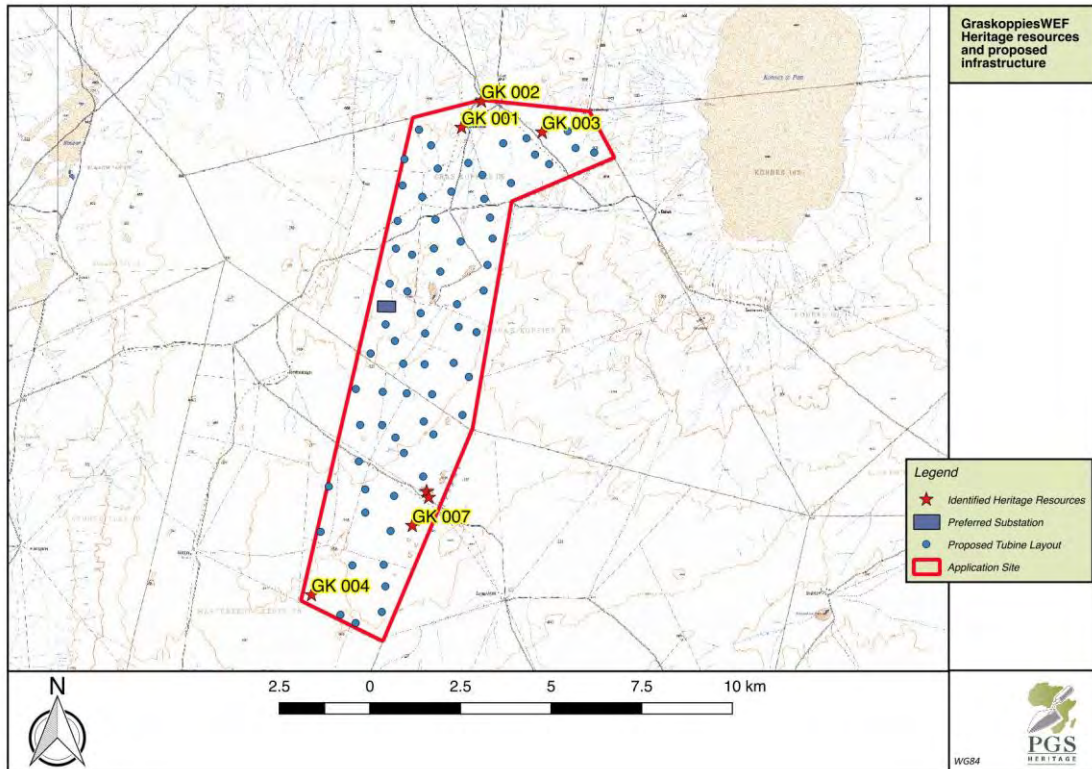


Figure 36: Propose Graskoppies WEF turbine layout in relation to the identified heritage resources

The impact rating and analysis was done based on the methodology as explained and summarised in **Appendix C** of this report. The design process and methodology followed by the developer for this project has enabled the heritage assessment to provide input into the proposed layouts. This resulted in cognisance being taken of the positions of the heritage resources and thus the reduction of impacts at an early design phase. Analysis of the impact matrix tables reflect this fact.

No identified heritage resources are affected by the proposed WEF layout and the following impact assessment tables are based on this fact.

6.1 Impact matrix

Table 5: Impact rating - Palaeontology

IMPACT TABLE	
Environmental Parameter	<i>Impact on the Palaeontology Heritage (fossils) of the development footprint</i>
Issue/Impact/Environmental Effect/Nature (E)	<p>The excavations and site clearance during the construction phase will involve substantial excavations into the superficial sediment cover as well as locally into the underlying bedrock. These excavations will modify the existing topography and may disturb, damage, destroy or permanently seal-in fossils at or below the ground surface that are then no longer available for scientific research.</p> <p>This impact is likely to occur only during the construction phase. No impacts are expected to occur during the operation phase.</p>
<i>Extent</i>	<p>The Leeuwborg Wind Farm project area will be located approximately 62km north of Loeriesfontein, in the Khai-ma and Hantam Local Municipalities within the Northern Cape Province.</p> <p><i>A brief description of the area over which the impact will be expressed</i></p>
<i>Probability</i>	<p>The development footprint is underlain by the Permo-Carboniferous Dwyka Group and Early to Middle Permian basinal mudrocks of the lower part of the Ecca Group (Karoo Supergroup). Permian and Jurassic bedrocks are mantled with a range of superficial deposits, mostly Late Caenozoic (Quaternary to Recent) in age. The intrusive Karoo dolerites are of no palaeontological significance and the Late Caenozoic superficial deposits are generally of very low palaeontological sensitivity.</p> <p>The probability of significant impacts on palaeontological heritage during the construction phase is low.</p>
<i>Reversibility</i>	<p>Impacts on fossil heritage are generally irreversible. Well-documented records and further palaeontological studies of any fossils exposed during construction would represent a positive impact from a scientific perspective. The possibility of a negative impact on the palaeontological heritage of the area can be reduced by the implementation of adequate damage mitigation procedures. If damage mitigation is properly undertaken the benefit scale for the project will lie within the beneficial category.</p> <p><i>Fossil Heritage is expected and fossils other than trace assemblages are generally scarce and most of the Ecca sediments are of low overall palaeontological sensitivity.</i></p>
<i>Irreplaceable loss of resources</i>	<p>The development footprint is underlain by the Permo-Carboniferous Dwyka Group and Early to Middle Permian basinal mudrocks of the lower part of the Ecca Group and is rated as insignificant loss of resources</p>
<i>Duration</i>	<p>The expected duration of the impact is assessed as potentially permanent to long term. In the absence of mitigation procedures (should fossil material be present within the affected area) the damage or destruction of any palaeontological materials will be permanent</p>
<i>Cumulative effect</i>	<p>Low Cumulative Impact</p> <p>The cumulative effect of the development area within the proposed location is considered to be low. The broader area near Loeriesfontein is underlain by the Dwyka, Lower Ecca, Karoo Dolerite and Late Caenozoic deposits. Karoo Dolerite is unfossiliferous while the fossil sensitivity in the Caenozoic is low. Fossils other than trace assemblages are generally scarce and most of the Ecca and Dwyka sediments are of low overall palaeontological sensitivity.</p>
<i>Intensity/magnitude</i>	<p>Probable significant impacts on palaeontological heritage during the construction phase are high, but the intensity of the impact on fossil heritage is rated as low</p>
<i>Significance Rating</i>	<i>A brief description of the importance of an impact which in turn dictates the level of mitigation required</i>

CLIENT NAME: South Africa Mainstream Renewable Power Developments (Pty) Ltd

prepared

by: PGS for SIVEST

Project Description: Graskoppies WEF

Revision No. 2

10 October 2017

Page 29 of 90

	Pre-mitigation impact rating	Post mitigation impact rating
Extent	2	1
Probability	2	1
Reversibility	2	1
Irreplaceable loss	2	1
Duration	4	1
Cumulative effect	2	1
Intensity/magnitude	2	1
Significance rating	-28 (low negative)	-6 (low negative)
Mitigation measures	<p>Recommended mitigation of the inevitable damage and destruction of fossil within the proposed development area would involve the surveying, recording, description and collecting of fossils within the development footprint by a professional palaeontologist. This work should take place after initial vegetation clearance has taken place but <i>before</i> the ground is levelled for construction</p> <p>Impacts on fossil heritage are generally irreversible. Well-documented records and further palaeontological studies of any fossils exposed during construction would represent a positive impact from a scientific perspective. The possibility of a negative impact on the palaeontological heritage of the area can be reduced by the implementation of adequate damage mitigation procedures. If damage mitigation is properly undertaken the benefit scale for the project will lie within the beneficial category.</p> <p>Not deemed necessary as the Allaridge Formation is unfossiliferous.</p>	

Table 6: Impact rating – Archaeological resources

IMPACT TABLE		
Environmental Parameter	Stone Age resources	
Issue/Impact/Environmental Effect/Nature	<p>Archaeological finds have been identified during the fieldwork having low archaeological significance.</p> <p>All the identified find spots could be impacted by construction activities however the impact is seen as negligible.</p>	
Extent	Localised	
Probability	Probable	
Reversibility	Non- renewable.	
Irreplaceable loss of resources	Archaeological sites are irreplaceable	
Duration	Permanent	
Cumulative effect	Low cumulative impact	
Intensity/magnitude	Medium	
Significance Rating	Negative medium impact before mitigation and low negative after mitigation.	
	Pre-mitigation impact rating	Post mitigation impact rating
Extent	2	2

Probability	3	1
Reversibility	4	4
Irreplaceable loss	4	4
Duration	4	4
Cumulative effect	3	1
Intensity/magnitude	2	1
Significance rating	-40 (Negative Medium Impact	-16 (Low negative
Mitigation measures	<p>A walk down of the final layout to determine if any significant sites will be affected.</p> <p>Monitor find spot areas if construction is going to take place through them. A management plan for the heritage resources needs then to be compiled and approved for implementation during construction and operations. Possible surface collections for sites with a medium to high significance as well as conducting a watching brief by heritage practitioner during the construction phase.</p> <p>Avoid the system of pans along the eastern border of the development area in the vicinity of GK006 and GK007.</p> <p>Avoid the historical farmstead at GK001</p>	

Table 7: Impact rating – chance finds

IMPACT TABLE		
Environmental Parameter	Unidentified heritage structures	
Issue/Impact/Environmental Effect/Nature	Due to the size of the area assessed and the design process requiring fieldwork before identification of the layout. The possibility of encountering heritage features in unsurveyed areas does exist.	
Extent	Localised and in most cases no more than 1000m ²	
Probability	Probable	
Reversibility	Heritage resources are non-renewable.	
Irreplaceable loss of resources	A brief description of the degree in which irreplaceable resources are likely to be lost	
Duration	Permanent	
Cumulative effect	Medium	
Intensity/magnitude	Medium	
Significance Rating	Medium negative before mitigation and low negative after mitigation for both the expanded and the constrained layout.	
	Pre-mitigation impact rating	Post mitigation impact rating
Extent	1	1
Probability	3	3
Reversibility	4	4
Irreplaceable loss	2	2
Duration	4	4
Cumulative effect	3	3

Intensity/magnitude	2	1
Significance rating	-34 (Medium negative)	-17 (Low negative)
	Post mitigation impact rating	
Mitigation measures	<p>A walk down of the final approved layout will be required before construction commence;</p> <p>Any heritage features of significance identified during this walk down will require formal mitigation or where possible a slight change in design could accommodate such resources.</p> <p>A management plan for the heritage resources needs then to be compiled and approved for implementation during construction and operations.</p>	

6.2 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.

6.3 Cumulative Impacts

This section evaluates the possible cumulative impacts (CI) on heritage resources with the addition of the Aletta WEF. The CI on heritage resources evaluated a 30-kilometer radius (**Figure 37**). It must further be noted that the evaluation is based on available heritage studies and cannot take the findings of outstanding studies on current ongoing EIA's in consideration.

The following must be considered in the analysis of the cumulative effect of development on heritage resources:

- **Fixed datum or dataset:** There is no comprehensive heritage data set for the Copperton region and thus we cannot quantify how much of a specific cultural heritage element is present in the region. The region has never been covered by a heritage resources study that can account for all heritage resources. Further to this none of the heritage studies conducted can with certainty state that all heritage resources within the study area has been identified and evaluated ;
- **Defined thresholds:** The value judgement on the significance of a heritage site will vary from individual to individual and between interest groups. Thus implicating that heritage resources' significance can and does change over time. An so will the the tipping threshold for impacts on a certain type of heritage resource;
- **Threshold crossing:** In the absence of a comprehensive dataset or heritage inventory of the entire region we will never be able to quantify or set a threshold to determine at what stage the impact from developments on heritage resources has reached or is reaching the danger level or excludes the new development on this basis. (Godwin, 2011)

Keeping the above shortcomings in mind, the methodology in evaluating cumulative impacts on heritage resources will be followed for the Impact Assessment phase.

The analysis of the completed studies as listed below (**Figure 37**), taking into account the findings and recommendations of each of the nine evaluated HIA's.

- MORRIS, DAVID. 2007. Archaeological Specialist input with respect to the upgrading railway infrastructure on the Sishen-Saldanha ore line in the vicinity of Loop 7a near Loeriesfontein. McGregor Museum.
- FOURIE, WOUTER. 2011. Heritage Impact Assessment for the proposed Solar Project on the farm Kaalspruit, Loeriesfontein. PGS Heritage and Grave Relocation Consultants.
- ALMOND, J.E. 2011. Palaeontological Desktop Study for the Proposed Mainstream Wind Farm Near Loeriesfontein, Namaqua District Municipality, Northern Cape Province.
- VAN SCHALKWYK, J. 2011. Heritage Impact Assessment for the proposed establishment of a wind farm and PV facility by Mainstream Renewable Power in the Loeriesfontein Region, Northern Cape Province.
- VAN DER WALT, JACO. 2012. Archaeological Impact Assessment for the proposed Hantam PV Solar Energy Facility on the farm Narosies 228, Loeriesfontein, Northern Cape Province.
- WEBLEY, L & HALKETT, D. 2012. Heritage Impact Assessment: Proposed Loeriesfontein Photo-Voltaic Solar Power Plant On Portion 5 of the Farm Klein Rooiberg 227, Northern Cape Province.
- MORRIS, DAVID. 2013. Specialist Input for the Environmental Basic Assessment and Environmental Management Program for the Khobab Wind Energy Facility: Power Line Route Options, Access Road And Substation Positions.
- ORTON, JAYSON. 2014. Heritage Impact Assessment for the proposed re-alignment of the authorized 132kV Power Line for the Loeriesfontein 2 WEF, Calvinia Magisterial District, Northern Cape.
- Fourie, W. 2015. Heritage Impact Assessment for the proposed establishment of the Dwarsrug wind farm and PV facility in the Loeriesfontein Region, Northern Cape Province.

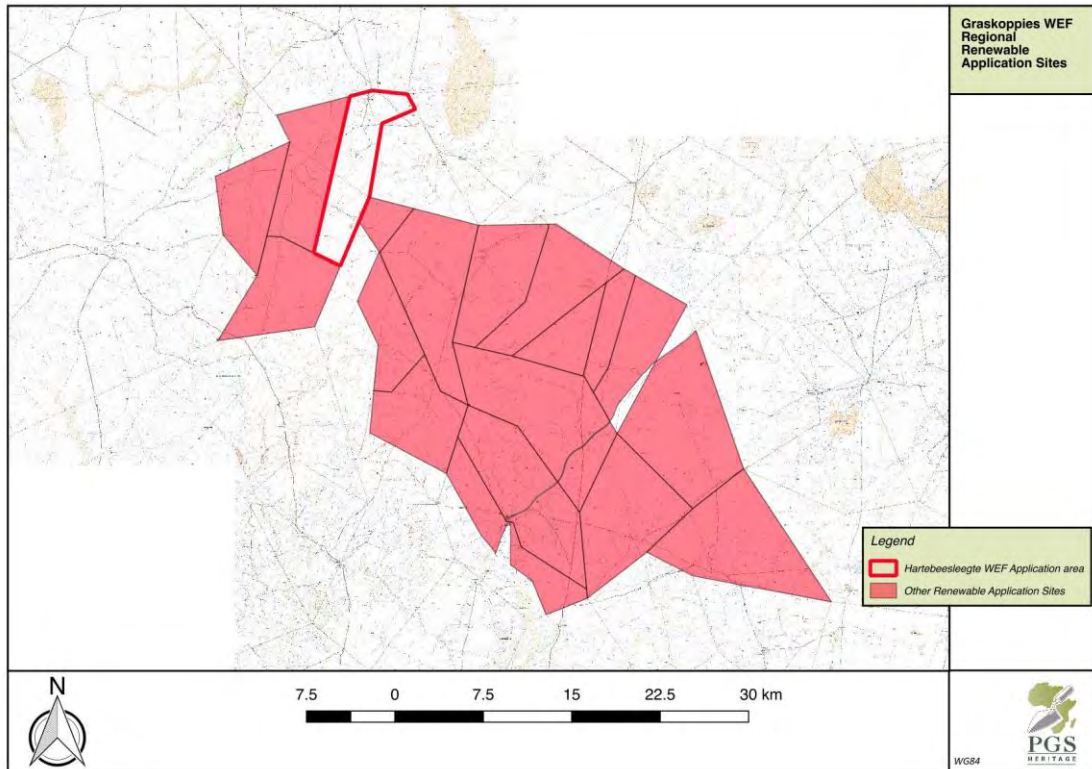


Figure 37: Other RE developments in relation to the Graskoppies Wind Farm application area

Table 8: Impact rating – Cumulative

IMPACT TABLE	
Environmental Parameter	Heritage Resources
Issue/Impact/Environmental Effect/Nature	The extent that the addition of this project will have on the overall impact of developments in the region on heritage resources
Extent	Local
Probability	Possible
Reversibility	Non- renewable.
Irreplaceable loss of resources	The nature of heritage resources are that they are non-renewable. The proper mitigation and documentation of these resources can however preserve the data for research
Duration	Permanent
Cumulative effect	It is my reserved but considered opinion that this additional load on the overall impact on heritage resources will be low. With a detailed and comprehensive regional dataset this rating could possibly be adjusted and more accurate.
Intensity/magnitude	Low
Significance Rating	Negative low impact before mitigation and low negative after mitigation.

	Pre-mitigation impact rating	Post mitigation impact rating
Extent	2	2
Probability	2	1
Reversibility	4	4
Irreplaceable loss	4	4
Duration	4	4
Cumulative effect	1	1
Intensity/magnitude	1	1
Significance rating	-18 (Negative medium impact)	-18 (Low negative)
Mitigation measures	<p>A walk down of the final approved layout will be required before construction commence;</p> <p>Any heritage features of significance identified during this walk down will require formal mitigation or where possible a slight change in design could accommodate such resources.</p> <p>A management plan for the heritage resources needs then to be compiled and approved for implementation during construction and operations.</p>	

It is my considered opinion that this additional load on the overall impact on heritage resources will be low. With a detailed and comprehensive regional dataset this rating could possibly be adjusted and more accurate.

6.4 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.

7 CONCLUSIONS AND RECOMMENDATIONS

PGS was appointed by SiVEST Environmental Division (SiVEST) to undertake an HIA that forms part of the EIA and EMP for the Graskoppies Wind Energy Facility (WEF) for South Africa Mainstream Renewable Power Developments (Pty) Ltd (Mainstream), near Loeriesfontein 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 HSR completed in October 2016 has shown that the proposed Graskoppies site to be developed as a WEF may have heritage resources present on the property. This has been confirmed through archival research and evaluation of aerial photography of the sites.

The subsequent field work completed for the October 2016, has confirmed the presence of 7 heritage resources as well as several areas with existing infrastructure such as fenced off camps, windmills and reservoirs.

No identified heritage resources are affected by the proposed WEF layout and the following impact assessment tables are based on this fact.

The design process and methodology followed by the developer for this project will enabled the heritage assessment to provide input into the proposed layouts. This resulted in cognisance being taken of the positions of the heritage resources and thus the reduction of impacts at an early design phase

The mitigation measures proposed is a follows:

7.1 Pre-Construction

1. A walk down of the final layout to determine if any significant sites will be affected.
2. Monitor find spot areas if construction is going to take place through them.
3. A management plan for the heritage resources needs then to be compiled and approved for implementation during construction and operations. Possible surface collections for sites with a medium to high significance as well as conducting a watching brief by heritage practitioner during the construction phase.
4. Avoid the system of pans along the eastern border of the development area in the vicinity of GK006 and GK007.
5. Avoid the historical farmstead at GK001

7.2 Palaeontology

In Palaeontological terms the significance is rated as LOW (negative). Consequently, pending the discovery of significant new fossil material here, no further specialist studies are considered to be necessary.

However, should fossil remains be discovered during any phase of construction, either on the surface or exposed by fresh excavations, the ECO responsible for these developments should be alerted immediately. Such discoveries ought to be protected (preferably in situ) and the ECO should alert SAHRA (South African Heritage Research Agency) so that appropriate mitigation (e.g. recording, sampling or collection) can be taken by a professional palaeontologist.

The specialist involved would require a collection permit from SAHRA. Fossil material must be curated in an approved collection (e.g. museum or university collection) and all fieldwork and reports should meet the minimum standards for palaeontological impact studies developed by SAHRA.

7.3 Visual Impact

The VIA study concluded that the visual impact of the proposed Graskoppies Wind Farm is not significant enough to prevent the project from proceeding and that an EA should be granted.

From a visual impact perspective, no visually sensitive receptors with tourism significance have been identified within the study area. A total number of seven (7) potentially sensitive visual receptors were however identified. These included scattered farmsteads / homesteads which house the local farmers as well as their farm workers. These dwellings are regarded as potentially sensitive visual receptors as they are located within a mostly rural setting and the proposed development will likely alter natural vistas experienced from these dwellings. In addition, the proposed development is expected to alter the largely natural / scenic character of the study area and contrast highly with the typical land use and/or pattern and form of human elements present as the study area is largely natural / scenic and untransformed. The visual impact of the proposed development on most the potentially sensitive visual receptors identified within the study area was rated as being medium. In addition, the proposed development would have a low visual impact on the Uitspankolk farmstead (VR 8)(5.5km northwest of the WEF), while the visual impact on the Bloupan farmstead (VR 18)(8.2km to the west of the WEF) is expected to be negligible from a visual perspective.

7.4 Cumulative Impact

It is my considered opinion that this additional load on the overall impact on heritage resources will be low. With a detailed and comprehensive regional dataset this rating could possibly be adjusted and more accurate.

8 REFERENCES

ALMOND, J.E. 2011. Palaeontological Desktop Study for the Proposed Mainstream Wind Farm Near Loeriesfontein, Namaqua District Municipality, Northern Cape Province.

FOURIE, WOUTER. 2011. Heritage Impact Assessment for the proposed Solar Project on the farm Kaalspruit, Loeriesfontein. PGS Heritage and Grave Relocation Consultants.

GIBB, A & Jacobs, S. 2017. Visual Impact Assessment Report – Impact Phase. Proposed Construction of the Xha! Boom Wind Farm near Loeriesfontein, Northern Cape Province

GODWIN, LUKE. 2011. The Application of Assessment of Cumulative Impacts in Cultural Heritage Management: A Critique. Australian Archaeology, No. 73 (December 2011), pp. 88-91

MORRIS, DAVID. 2007. *Archaeological Specialist input with respect to the upgrading railway infrastructure on the Sishen-Saldanha ore line in the vicinity of Loop 7a near Loeriesfontein.* McGregor Museum.

MORRIS, DAVID. 2007. *Archaeological Specialist input with respect to the upgrading railway infrastructure on the Sishen-Saldanha ore line in the vicinity of Loop 7a near Loeriesfontein.* McGregor Museum.

CLIENT NAME: South Africa Mainstream Renewable Power Developments (Pty) Ltd

prepared

by: PGS for SIVEST

Project Description: Graskoppies WEF

Revision No. 2

10 October 2017

Page 37 of 90

MORRIS, DAVID, 2010. Specialist input for the Scoping Phase of the Environmental Impact Assessment for the proposed Pofadder Solar Thermal Facility, Northern Cape Province. Archaeology. McGregor Museum.

MORRIS, DAVID. 2013. Specialist Input for the Environmental Basic Assessment And Environmental Management Program for the Khobab Wind Energy Facility: Power Line Route Options, Access Road And Substation Positions.

ORTON, JAYSON. 2014. Heritage Impact Assessment for the proposed re-alignment of the authorized 132kV Power Line for the Loeriesfontein 2 WEF, Calvinia Magisterial District, Northern Cape.

VAN SCHALKWYK, J. 2011. Heritage Impact Assessment for the proposed establishment of a wind farm and PV facility by Mainstream Renewable Power in the Loeriesfontein Region, Northern Cape Province.

VAN DER WALT, JACO. 2012. Archaeological Impact Assessment for the proposed Hantam PV Solar Energy Facility on the farm Narosies 228, Loeriesfontein, Northern Cape Province.

WEBLEY, L & HALKETT, D. 2012. Heritage Impact Assessment: Proposed Loeriesfontein Photo-Voltaic Solar Power Plant On Portion 5 of the Farm Klein Rooiberg 227, Northern Cape Province.



Appendix A

LEGISLATIVE PRINCIPLES

LEGISLATIVE REQUIREMENTS – TERMINOLOGY AND ASSESSMENT CRITERIA

3.1 General principles

In areas where there has not yet been a systematic survey to identify conservation worthy places, a permit is required to alter or demolish any structure older than 60 years. This will apply until a survey has been done and identified heritage resources are formally protected.

Archaeological and palaeontological sites, materials, and meteorites are the source of our understanding of the evolution of the earth, life on earth and the history of people. In the new legislation, permits are required to damage, destroy, alter, or disturb them. People who already possess material are required to register it. The management of heritage resources are integrated with environmental resources and this means that before development takes place heritage resources are assessed and, if necessary, rescued.

In addition to the formal protection of culturally significant graves, all graves, which are older than 60 years and are not in a cemetery (such as ancestral graves in rural areas), are protected. The legislation protects the interests of communities that have interest in the graves: they may be consulted before any disturbance takes place. The graves of victims of conflict and those associated with the liberation struggle will be identified, cared for, protected and memorials erected in their honour.

Anyone who intends to undertake a development must notify the heritage resource authority and if there is reason to believe that heritage resources will be affected, an impact assessment report must be compiled at the developer's cost. Thus, developers will be able to proceed without uncertainty about whether work will have to be stopped if an archaeological or heritage resource is discovered.

According to the National Heritage Act (Act 25 of 1999 section 32) it is stated that:

An object or collection of objects, or a type of object or a list of objects, whether specific or generic, that is part of the national estate and the export of which SAHRA deems it necessary to control, may be declared a heritage object, including –

- objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects, meteorites and rare geological specimens;
- visual art objects;
- military objects;
- numismatic objects;
- objects of cultural and historical significance;
- objects to which oral traditions are attached and which are associated with living heritage;
- objects of scientific or technological interest;
- books, records, documents, photographic positives and negatives, graphic material, film or video or sound recordings, excluding those that are public records as defined in section 1 (xiv) of the National Archives of South Africa Act, 1996 (Act No. 43 of 1996), or in a provincial law pertaining to records or archives; and
- any other prescribed category.

Under the National Heritage Resources Act (Act No. 25 of 1999), provisions are made that deal with, and offer protection, to all historic and pre-historic cultural remains, including graves and human remains.

3.2 Graves and cemeteries

Graves younger than 60 years fall 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 reinterment 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. In order 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).

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 the South African Heritage Resource Agency (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 administered by a local authority. Graves in the category located inside a formal cemetery administered by a local authority will also require the same authorisation as set out for graves younger than 60 years over and above 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.



Appendix B

Heritage Assessment Methodology

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

The Heritage Impact Assessment (HIA) report to be compiled by PGS Heritage (PGS) for the proposed Aletta WEF will assess the heritage resources found on site. This report will contain the applicable maps, tables and figures 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 consists 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.

Step II – Physical Survey: A physical survey was conducted on foot and by vehicle through the proposed project area by qualified archaeologists, 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 - <10/50m²
 - Medium - 10-50/50m²
 - High - >50/50m²
- 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

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



Appendix C

**Impact Assessment Methodology to be utilised
during EIA phase**

1 ENVIRONMENTAL IMPACT ASSESSMENT METHODOLOGY

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.

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 3.

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.

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.

1.2.1 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:

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:

$(\text{Extent} + \text{probability} + \text{reversibility} + \text{irreplaceability} + \text{duration} + \text{cumulative effect}) \times \text{magnitude/intensity}$.

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.



Appendix D
Palaeontological Desktop Assessment

**PALAEONTOLOGICAL DESKTOP IMPACTASSESSMENT FOR THE PROPOSED
DEVELOPMENT OF FOUR LEEUWBERG WIND FARMS AND BASIC
ASSESSMENTS FOR THE ASSOCIATED GRID CONNECTION NEAR
LOERIESFONTEIN, NORTHERN CAPE PROVINCE**

Prepared for:

PGS Heritage (Pty) Ltd

27 October 2016

Prepared by

BANZAI ENVIRONMENTAL (PTY) LTD

P.O. BOX 11023

UNIVERSITAS

BLOEMFONTEIN

9323

EXECUTIVE SUMMARY

Banzai Environmental was appointed by PSG Heritage to conduct the Palaeontological Desktop Impact Assessment Report for the proposed development of four Leeuwborg Wind Farms near Loeriesfontein in the Northern Cape Province. The proposed development will consist of four wind farms namely Hartebeesleegte, Graskoppies, Itemba and !Xha Boom Wind Farm and associated infrastructure. According to the National Heritage Resources Act (Act No 25 of 1999, section 38), a palaeontological impact assessment is required to detect the presence of fossil material within the proposed development footprint and to assess the impact of the construction and operation of the four wind farms on the palaeontological resources.

The development footprint is underlain by the Permo-Carboniferous Dwyka Group and Early to Middle Permian rocks of the lower part of the Ecca Group (Karoo Supergroup). This include the Prince Albert, Whitehill and Tierberg Formations (in order of decreasing age). Permian and Jurassic bedrocks are mantled with a range of superficial deposits, mostly Late Caenozoic (Quaternary to Recent) in age. The intrusive Karoo dolerites are of no direct palaeontological significance and the Late Caenozoic superficial deposits are generally of very low palaeontological sensitivity.

The Dwyka Group is known for trace fossils, organic-walled microfossils, marine invertebrates fish and vascular plants. Fossil material of aquatic vertebrates (fish, mesosaurid reptiles,) invertebrates (*e.g.* crustaceans) and petrified wood is known from the Whitehill Formation. These fossils are more scarce in the Prince Albert and Tierberg Formations. However, fossils other than trace assemblages are generally scarce and most of the Dwyka and Ecca sediments are of **low overall palaeontological sensitivity**.

The proposed Leeuwborg wind farm development is thus unlikely to pose a substantial threat to local fossil heritage. In Palaeontological terms the significance is rated as LOW (negative). Consequently, pending the discovery of significant new fossil material here, **no further specialist studies** are considered to be necessary.

However, should fossil remains be discovered during any phase of construction, either on the surface or exposed by fresh excavations, the ECO responsible for these developments should be alerted immediately. Such discoveries ought to be protected (preferably *in situ*) and the ECO should alert SAHRA (South African Heritage Research Agency) so that appropriate mitigation (*e.g.* recording, sampling or collection) can be taken by a professional paleontologist.

The specialist involved would require a collection permit from SAHRA. Fossil material must be curated in an approved collection (*e.g.* museum or university collection) and all fieldwork and reports should meet the minimum standards for palaeontological impact studies developed by SAHRA.

CONTENTS

1	INTRODUCTION	5
1.1	Project Background	5
2	WIND ENERGY	5
2.1	Benefits (Information Provided By Sivest)	5
2.2	Technical Details	7
2.3	Wind Farm Electrical Infrastructure	7
2.4	Roads	7
2.5	Construction Lay Down Area	8
3	LEGISLATION	9
3.1	General Management Guidelines	9
3.2	SECTION 35 OF THE NATIONAL HERITAGE RESOURCES ACT 25 OF 1999	9
4	OBJECTIVE	10
5	GEOLOGICAL AND PALAEOLOGICAL HISTORY	11
5.1	GEOLOGY	11
5.1.1	Dwyka Group	11
5.1.2	Ecca Group	11
5.1.3	Karoo Dolerite Suite	12
5.1.4	Late Cenozoic superficial deposits	12
5.2	PALAEOLOGY	12
5.2.1	Dwyka Group	12
5.2.2	Ecca Group	13
5.2.3	Karoo Dolerite Suite	13
5.2.4	Late Cenozoic superficial deposits	13
6	GEOGRAPHICAL LOCATION OF THE SITE	23
6.1	Project Location	23
7	METHODS.....	23
8	ASSUMPTIONS AND LIMITATIONS	23
9	IMPACT ASSESSMENTS	24
9.1	Nature of the impact	24
9.2	Sensitive areas	24
9.3	Geographical extent of impact	24
9.4	Duration of impact	24
9.5	Potential significance of the impact	24
9.6	Severity / benefit scale	24
9.7	Intensity	25
9.8	Probability of the impact occurring	25

10	DAMAGE MITIGATION, REVERSAL AND POTENTIAL IRREVERSIBLE LOSS	25
10.1	Mitigation	25
10.2	Degree of irreversible loss	25
10.3	Degree to which the impact may cause irreplaceable loss of resources	25
10.4	Cumulative impacts	25
11	FINDINGS AND RECOMMENDATIONS.....	26
12	IMPACT TABLE.....	27
13	REFERENCES	32

1 INTRODUCTION

Banzai Environmental was appointed by PSG Heritage to conduct the Palaeontological Desktop Impact Assessment Report for the proposed development of four Leeuwsberg Wind Farms near Loeriesfontein in the Northern Cape Province.

1.1 Project Background

South Africa Mainstream Renewable Power Developments (Pty) Ltd (Mainstream) appointed SiVEST, as the independent Environmental Assessment Practitioner, to undertake the required Environmental Assessment processes for the proposed construct of four Leeuwsberg Wind Farms near Loeriesfontein in the Northern Cape Province. The proposed new developments are:

- 140MW Graskoppies Wind Farm and Grid Connection
- 140MW !Xha Boom Wind Farm and Grid Connection
- 140MW Hartebeesleegte Wind Farm and Connection
- 140MW Itemba Wind Farm and Grid Connection

Additionally, Mainstream, are proposing the construction of four 132kV power lines, four 33kV/132kV on-site substations and a 132kV Linking Substation, to connect the proposed wind farms to the national grid at Helios Substation. In order to accommodate the Department of Energy's competitive bidding process for procuring renewable energy from Independent Power Producers in South Africa, each wind farm will require a separate Environmental Authorisation and each grid connection will also require a separate Environmental Authorisation.

Both Environmental Impact and Basic Assessments will be conducted in terms of the EIA Regulations (2014) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA). According to these regulations, Environmental Impact Assessments will be necessary for the proposed wind farms and Basic Assessments will be required for the associated grid connections. Thus, four EIAs will be undertaken, one for each proposed wind farm as well as four Basic Assessments, one for each associated grid connection. Even though each wind farms and associated grid connection will be assessed separately, a single public participation process is being undertaken for all eight proposed projects.

2 WIND ENERGY

2.1 Benefits (Information Provided by Sivest)

The growing demand for energy and present electricity shortages as well as the need to find more sustainable and environmentally friendly energy resources, South Africa has embarked on an infrastructure growth programme supported by various government initiatives. In reaction to this goal; Mainstream are recommending to develop the four Leeuwsberg Wind Farms, associated infrastructure and four grid connections near Loeriesfontein in the Northern Cape Province. The overall objective of

the project is to generate electricity, by means of renewable energy technologies, to feed into the national grid at Helios Substation.

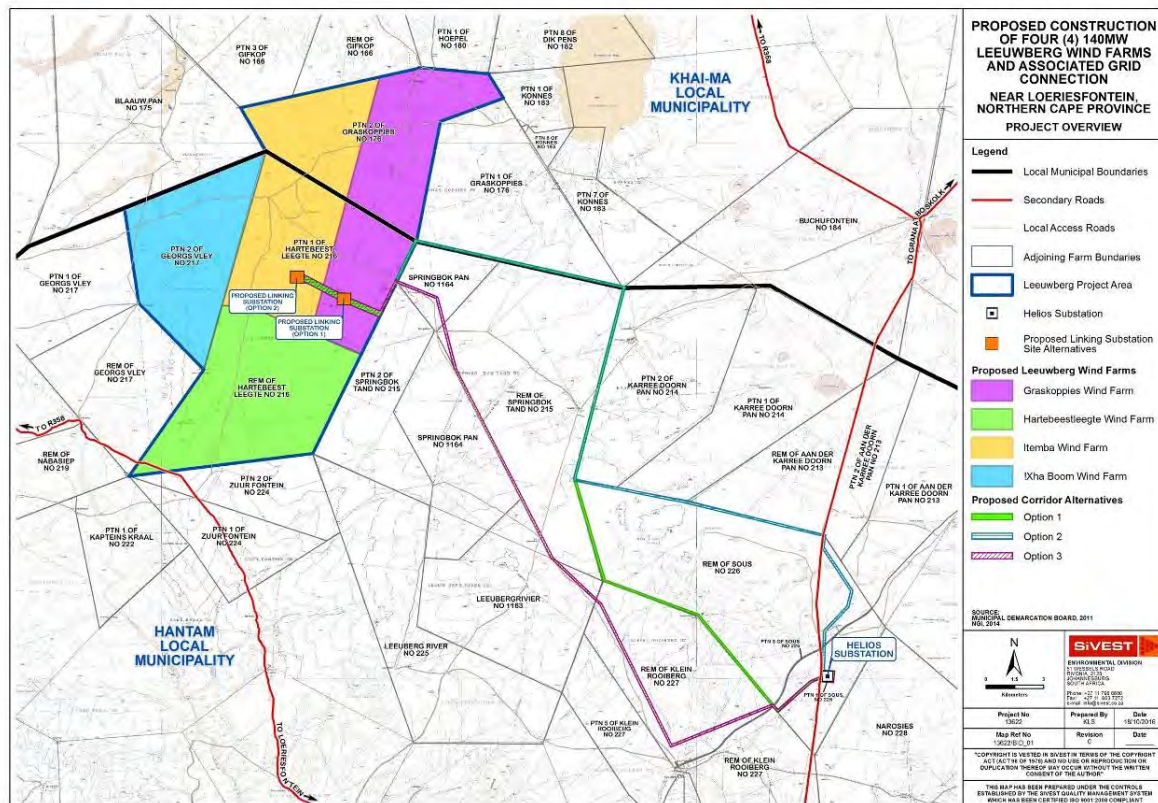


Figure 1: Locality of the proposed development of four Leeuwigberg Wind Farms near Loeriesfontein in the Northern Cape Province. The proposed development footprint will take place on Graskoppies Wind Farm, Hartebeestlegte Wind Farm, Itemba Wind Farm, and !Xha Boom Wind Farm. (Map provided by SiVest).

- Wind energy is renewable, clean and non-polluting (greenhouse gases etc.), and does not produce by-products (atmospheric contaminants or thermal pollution) that could be detrimental to the environment;
- Wind farms are usually well suited to rural areas and therefore have a reduced impact on agriculture compared to other electricity generating options. Wind turbines can also contribute to economic growth in these areas;
- Wind turbines make use of comparatively simple technology in terms of design and construction;
- Wind energy is competitively priced compared to other renewable energy sources;
- Localised production of energy reduces transmission line losses associated with transmitting electricity over long distances;
- The use of wind turbines reduces the use of coal and other fossil fuels with their associated emissions of greenhouse gases; and
- Wind farms improve energy security for South Africa, reducing dependency on fossil fuels

Wind turbines are mounted onto a tower to confine wind energy. The kinetic energy generated by the wind turn the blades of the turbines to generate electricity. The wind turbines are erected at a height of up to 160m above the ground and take advantage of the fastest and less turbulent wind. Usually, 2 to 3 blades are mounted on a shaft to form a rotor. The nacelle sits on top of the hub and contains the generator, control equipment, gearbox and anemometer for monitoring the wind speed and direction. The mechanical power generated through the rotating blades is transmitted to the generator via a gear box and drive train which converts the turning motion of the blades into electricity.

Wind turbines are generally designed to operate continuously for more than 20 years with minimal maintenance. A wind energy facility can be monitored and controlled remotely with a mobile team for maintenance when required.

2.2 Technical Details

At this stage each proposed wind farm, consisting of the turbines and associated infrastructure, will have a total generation capacity of 140MW. The number of wind turbines will be determined during the EIA process. The generated electricity will be fed into the national grid at the Helios Substation via a 132kV power line.

The size of the wind turbines will depend on the developable area and the total generation capacity that can be produced as a result. The wind turbines will therefore have a hub height of up to 160m and a rotor diameter of up to 160m. The blade rotation direction will depend on wind measurement information received later in the process. The electrical generation capacity for each turbine will range from 1.5 to 4MW depending on the final wind turbine selected for the proposed development.

2.3 Wind Farm Electrical Infrastructure

The wind turbines will be connected to the substation using buried (up to a 1,5m depth) medium voltage cables except where a technical assessment of the proposed design suggests that overhead lines are appropriate, such as over rivers and gullies. Where overhead power lines are to be constructed, monopole tower structures will be used in combination with the steel lattice towers at bend points. The dimensions of the monopole structures will depend on grid safety requirements and the grid operator. The exact location of the towers and the final design will depend on Eskom requirements. The proposed wind farm will connect to the national grid at Helios substation via a 132kV power line with a length of up to 48km.

A new substation and associated transformers will be developed which will supply the generated electricity to the national grid. The connection from the substation to the national grid line will be an overhead power line.

2.4 Roads

Access roads width and location will be determined during the Environmental Impact Assessment and Basic Assessment processes.

2.5 Construction Lay Down Area

A temporary lay down area will be constructed for the proposed development and will include an access road and a contractor's site office

Other infrastructure includes:

- Operation and maintenance (O&M) buildings;
- Fencing; and
- Linking station.

Should more than one wind farm receive an EA and a license from the DoE the option of sharing the Linking Station and 132kV power line will be considered.

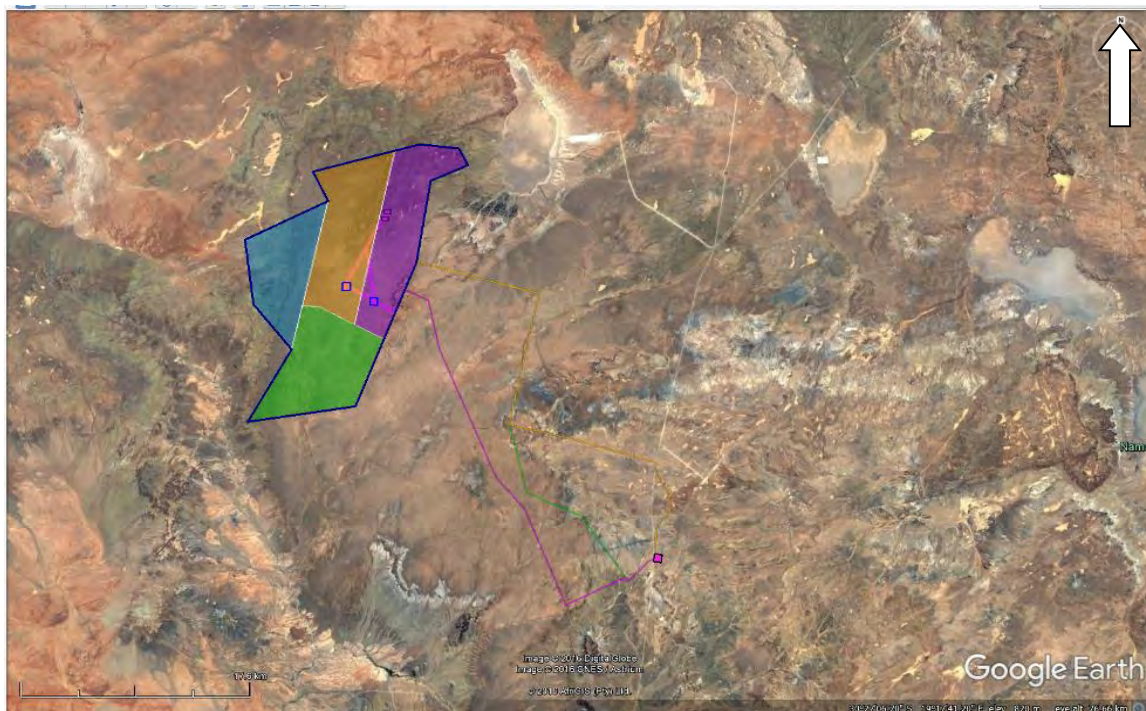


Figure 2: Google Earth image (2016) of the proposed location of the four Leeuwborg Wind Farms near Loeriesfontein in the Northern Cape Province.

3 LEGISLATION

3.1 General Management Guidelines

1. The National Heritage Resources Act (Act 25 of 1999) section 38(1), 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 m² 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.SAHRA;
 - (d) the re-zoning of a site exceeding 10 000 m² 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.

The protection and management of Cultural Heritage in South Africa is governed by the National Heritage Resources Act (Act 25 of 1999). This Palaeontological Desktop Assessment forms part of the Heritage Impact Assessment (HIA) and complies with the requirements of the above mentioned Act. In accordance with Section 38, an HIA is required to assess any potential impacts to palaeontological heritage within the development footprint.

3.2 SECTION 35 OF THE NATIONAL HERITAGE RESOURCES ACT 25 OF 1999

- The protection of archaeological and palaeontological sites and material and meteorites is the responsibility of a provincial heritage resources authority.
- All archaeological objects, palaeontological material and meteorites are the property of the State.
- Any person who discovers archaeological or palaeontological objects or material or a meteorite in the course of development or agricultural activity must immediately report the find to the responsible heritage resources authority, or to the nearest local authority offices or museum, which must immediately notify such heritage resources authority.
- No person may, without a permit issued by the responsible heritage resources authority—
- destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;
- destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;
- trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or

- bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.
- When the responsible heritage resources authority has reasonable cause to believe that any activity or development which will destroy, damage or alter any archaeological or palaeontological site is under way, and where no application for a permit has been submitted and no heritage resources management procedure in terms of section 38 has been followed, it may—
- serve on the owner or occupier of the site or on the person undertaking such development an order for the development to cease immediately for such period as is specified in the order; and/or
- carry out an investigation for the purpose of obtaining information on whether or not an archaeological or palaeontological site exists and whether mitigation is necessary.

4 OBJECTIVE

According to the SAHRA APM Guidelines: Minimum Standards for the Archaeological and Palaeontological Components of Impact Assessment Reports' the aims of the palaeontological impact assessment are:

- to identify exposed and subsurface rock formations that are considered to be palaeontologically significant;
- to assess the level of palaeontological significance of these formations;
- to comment on the impact of the development on these exposed and/or potential fossil resources; and
- To make recommendations as to how the developer should conserve or mitigate damage to these resources.
-

The objective is thus to conduct a Palaeontological Desktop Assessment, which forms of part of the Heritage Impact Assessment (HIA) and the EIA Report, to determine the impact of the development on potential palaeontological material at the site.

When a palaeontological desktop/scoping study is conducted, the potentially fossiliferous rocks (i.e. groups, formations, members, etc.) represented within the study area are determined from geological maps. The known fossil heritage within each rock unit is collected from published scientific literature; fossil sensitivity map; consultations with professional colleagues, previous palaeontological impact studies in the same region and the databases of various institutions may be consulted. This data is then used to assess the palaeontological sensitivity of each rock unit of the study area on a desktop level. The likely impact of the proposed development on local fossil heritage is subsequently established on the basis of the palaeontological sensitivity of the rocks and the nature and scale of the development itself (extent of new bedrock excavated).

If rocks of moderate to high palaeontological sensitivity are present within the study area, a Phase 1 field-based assessment by a professional palaeontologist is necessary. Generally, damaging impacts on palaeontological heritage occur during the construction phase. These excavations will modify the existing topography and may disturb damage, destroy or permanently seal-in fossils at or below the ground surface that are then no longer available for scientific study.

When specialist palaeontological mitigation is suggested, it may take place prior to construction or, even more successfully, during the construction phase when new, potentially fossiliferous bedrock is still exposed and available for study. Mitigation usually involves the careful sampling, collection and recording of fossils as well as relevant data concerning the surrounding sedimentary matrix. Excavation of the fossil heritage will require a permit from SAHRA and the material must be housed in a permitted institution. With appropriate mitigation, many developments involving bedrock excavation will have a *positive* impact on our understanding of local palaeontological heritage.

5 GEOLOGICAL AND PALAEOLOGICAL HISTORY

The development footprint is underlain by the Permo-Carboniferous Dwyka Group and Early to Middle Permian basinal rocks of the lower part of the Eccca Group (Karoo Supergroup). They are assigned to the Prince Albert Formation, Whitehill Formation and Tierberg Formation in order of decreasing age. The Eccca Group were laid down within the marine to freshwater Eccca Sea.

These mudrocks are generally weathered, and creates landscapes of low relief. The Eccca Group sediments, particularly the Whitehil Formation, are intruded by Early Jurassic (183 ± 2 Million years old) igneous intrusions of the Karoo Dolerite Suite (Duncan & Marsh 2006). The basic sills thermally metamorphosed or baked the adjacent Eccca country rocks. In many areas the Permian and Jurassic bedrocks are mantled with a variety of superficial deposits, most of which is probably of Late Caenozoic (Quaternary to Recent) age. This include doleritic surface rubble, gravelly to silty river alluvium and pan sediments and small patches of aeolian (i.e. wind-blown) sands. The intrusive Karoo dolerites are of no direct palaeontological significance and the Late Caenozoic superficial deposits are generally of very low palaeontological sensitivity.

5.1 GEOLOGY

5.1.1 *Dwyka Group*

This Group represents the lowermost unit of the Karoo Supergroup and are between 300 and 290 million years old. Dwyka deposits were deposited in a cold, glacially-dominated environment which occurred when South Africa lay below a massive ice sheet some 4km thick. The Dwyka Group consists almost throughout of gravelly sediments with subordinate vorved shale and mudstone containing scraped and facetted pebbles. Dark-grey tillite was deposited by retreating glaciers. This rock unit is characterised by a rich assemblage of dropstones that vary in size from millimetre scale to nearly a meter in diameter.

5.1.2 *Eccca Group*

The Permian aged Eccca Group is undifferentiated and comprises of dark grey shale, mudstone and fine-grained sandstone (Johnson et al, 2006). The sedimentary rocks are severely weathered and mostly only exposed in deep excavations for road cuttings and quarries. The Eccca Group rocks are interpreted as a deep water deposit of silts and clays in the Eccca Sea.

The **Prince Albert Formation** consists of marine to hyposaline basin plain mudrocks with minor volcanic ashes, phosphates and iron stones, while post-glacial mudrocks is also present at the base of

the Prince Albert Formation. The sediments usually appear dark on satellite images because the outcrop is mantled in gravels rich in ferromanganese minerals (Gravel clasts frequently have a shiny-black patina of “desert varnish”). This unit of Early Permian (Asselian / Artinskian) age was formerly known as “Upper Dwyka Shales”.

The **Whitehill Formation** consists of finely-laminated carbon-rich mudrocks of Early to Mid Permian (Artinskian) age. These distinctive sediments were laid down about 278 Ma (million years ago) in a wide shallow, brackish to freshwater basin (Ecca Sea) that stretched across southwestern Gondwana, from southern Africa into South America. Near surface weathering of these highly-carbonaceous sediments produces pale grey to cream colours that are readily seen in satellite images where the bedrock is exposed.

The **Tierberg Formation** is interpreted as offshore non-marine mudrocks with distal turbidite beds, prodeltaic sediments and represented by greenish weathering shale with subordinated siltstone and sandstone (Johnson et al, 2006).

5.1.3 *Karoo Dolerite Suite*

The Karoo Dolerite Suite is a widespread network of basic igneous bodies (dykes, sills) that were intruded into sediments of the Main Karoo Basin in the Early Jurassic Period (approximately 183 million years ago) during the breakup of Gondwana.

5.1.4 *Late Caenozoic superficial deposits*

Various types of superficial deposits of Late Caenozoic (Miocene to Pliocene to Recent) age occur throughout the Karoo (Partridge *et al.* 2006). They include pedocretes (e.g. calcretes), colluvial slope deposits, down wasted surface gravels, river alluvium, wind-blown sands as well as spring and pan sediments. Karoo hill slopes are usually mantled with a thin to thick layer of colluvium or slope deposits (e.g. sandstone and dolerite scree or talus deposits, sheetwash).

5.2 PALAEOLOGY

5.2.1 *Dwyka Group*

Trackways, produced mostly by fish and arthropods (invertebrates), have been recovered in shales from the uppermost Dwyka Formation. Other trace fossils include coprolites (fossilized faeces) of chondrichthyans (sharks, skates and rays). Body fossils include araneous foraminifera and radiolarians (single-celled organisms), bryozoans, sponge spicules (internal support elements of sponges), primitive starfish, orthoceroid nautiloids (marine invertebrates similar to the living Nautilus), goniatite cephalopods (Eoasinites sp.), gastropods (marine snails such as *Peruvispira viperdorfensis*), bivalves (*Nuculopsis* sp., *Phestia* sp., *Aphanaia haibensis*, *Eurydesma mytiloides*), brachiopods (*Attenuatella* sp.) and palaeoniscoid fish such as *Namaichthys schroederi* and *Watsonichthys lotzi*. Fossil plants have also been found, including lycopods (*Leptophloem australe*), moss, leaves and stems (possibly belonging to a proto-glossopterid flora). Fossil spores and pollens (moss, fern and horsetail spores and primitive gymnosperm pollens) as well as fossilized wood probably belonging to primitive gymnosperms have also been recorded from Dwyka deposits (MacRae, 1999; McCarthy and Rubidge, 2005).

5.2.2 *Ecca Group*

The fossil assemblage of the **Prince Albert Formation** is basically trace fossils. Trace fossils have been described from the deep water deposits of this Group in various places in the Karoo Basin, whereas plant fossils are abundantly present in the sandstone rich units in the northern parts of the Basin. This trace fossil assemblage of the non-marine *Mermia* Ichnofacies, is dominated by the ichnogenera *Umfolozia* (arthropod trackways) and *Undichna* (fish swimming trails), are generally found in basinal mudrock facies of the Prince Albert Formation.

Fossil Heritage of the **Whitehill Formation** includes mesosaurid reptiles, palaeoniscoid fish, small eocarid crustaceans, insects, trace fossils (king crab track ways. shark coprolites?), palynomorphs (organic-walled spores and pollens), petrified wood (mainly of primitive gymnosperms, silicified or calcified) and sparse vascular plant remains (Glossopteris leaves, lycopods etc).

The fossil assemblage of the **Tierberg Formation** comprise of disarticulated micro vertebrate remains (e.g. fish teeth, scales) sponge spinucles, scarce vascular plants (leaves and petrified wood) and a moderate diversity if trace fossil assemblages.

5.2.3 *Karoo Dolerite Suite*

The Karoo Dolerite Suite consists of igneous rocks and are unfossiliferous.

5.2.4 *Late Caenozoic superficial deposits*

The central Karoo drift deposits have been relatively neglected in palaeontological terms. They may occasionally contain important fossil biotas, e.g. bones, teeth and horn cores of mammals as well as remains of reptiles like tortoises. Non-marine molluscs (bivalves, gastropods), ostrich egg shells, trace fossils (e.g. calcretised termitaria, coprolites), and plant remains such as peats or palynomorphs (pollens, spores) in organic-rich alluvial horizons and siliceous diatoms in pan sediments have also been found.

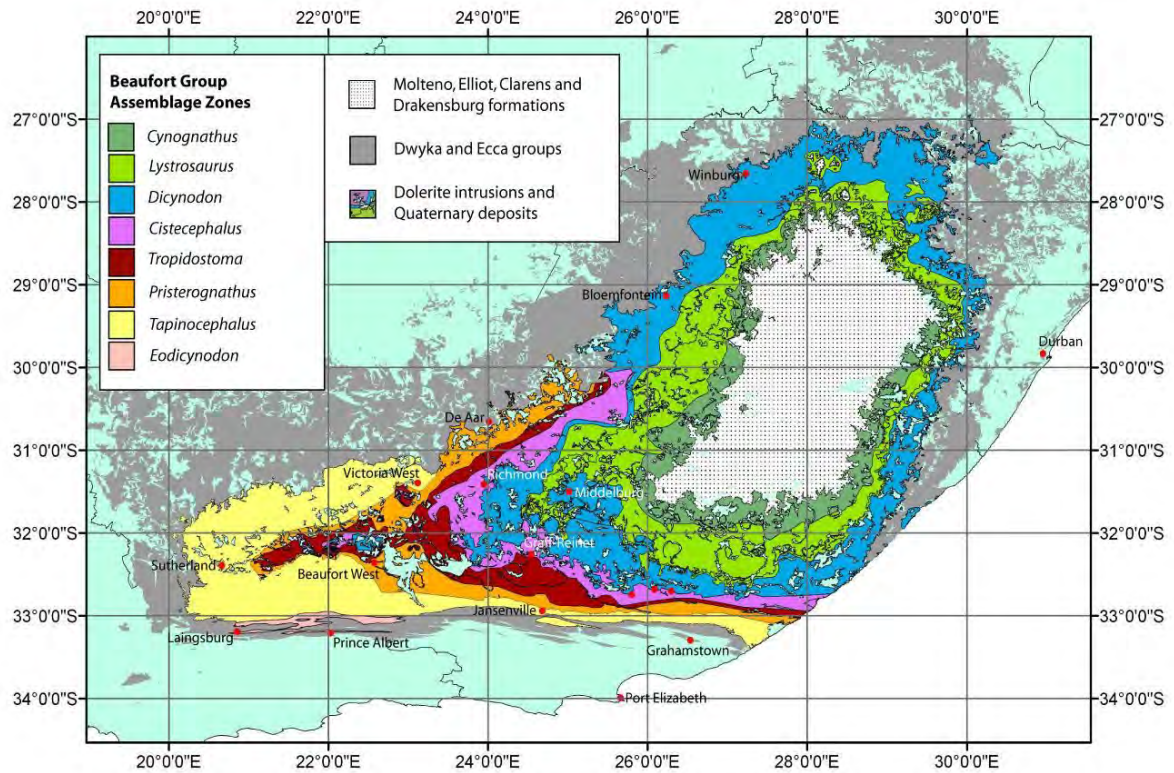


Figure 3: The surface geology of South Africa, as shown on the most recent fossil assemblage zone map for the Main Karoo Basin (Map modified from Van der Walt *et al.* 2010)

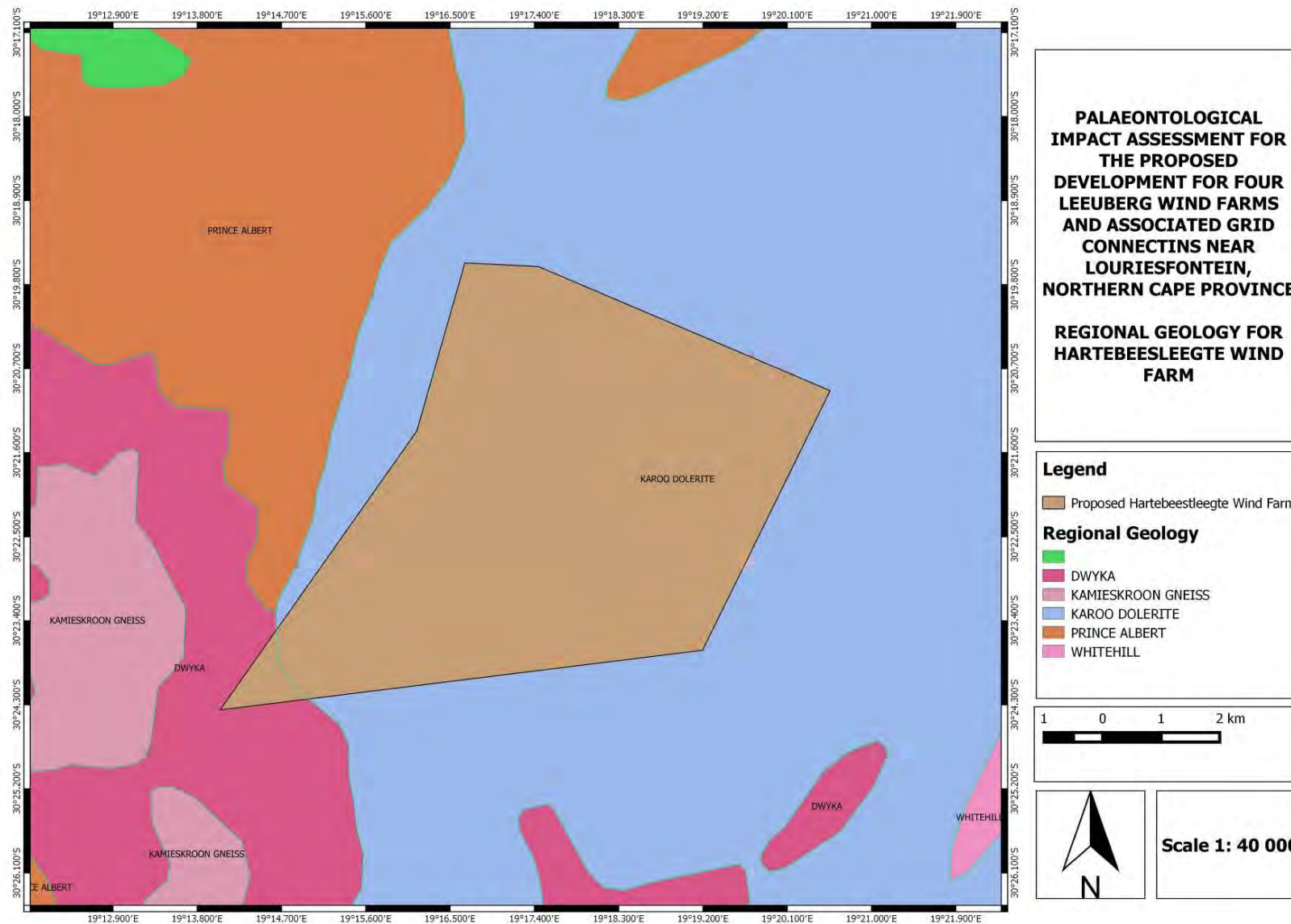


Figure 4: The surface geology of the proposed Hartebeeslegte Wind Farm near Loeriesfontein in the Northern Cape Province. The development footprint is mostly underlain by Karoo Dolerite and a small area in the south west is underlain by the lowermost unit of the Karoo Supergroup, namely the Dwyka Group.

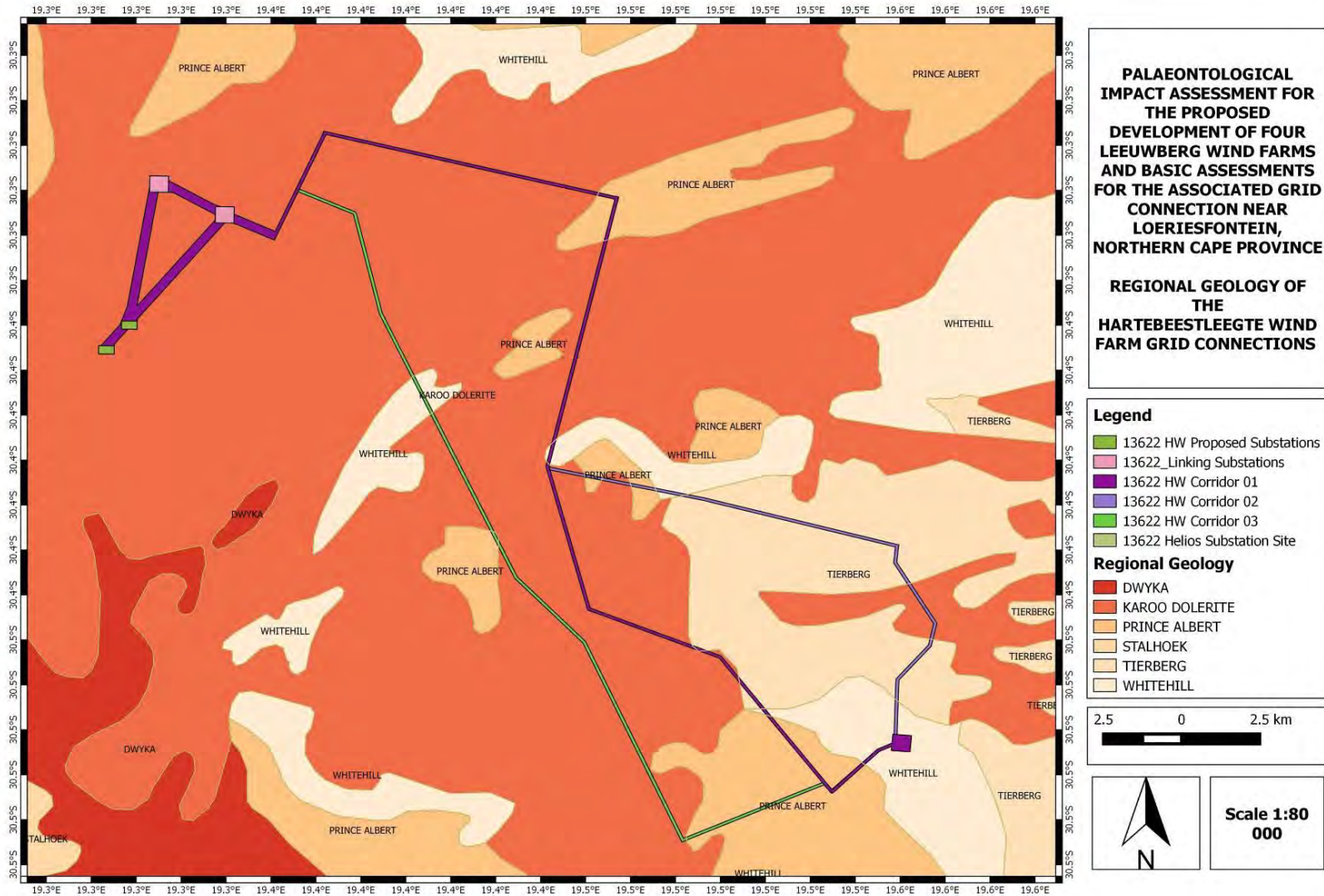


Figure 5: The surface geology of the proposed grid connection for the Hartebesleegte Wind Farm near Loeriesfontein in the Northern Cape Province. The development footprint is underlain by Karoo Dolerite as well as the Prince Albert, Whitehill and Tierberg Formations of the Ecca Group.

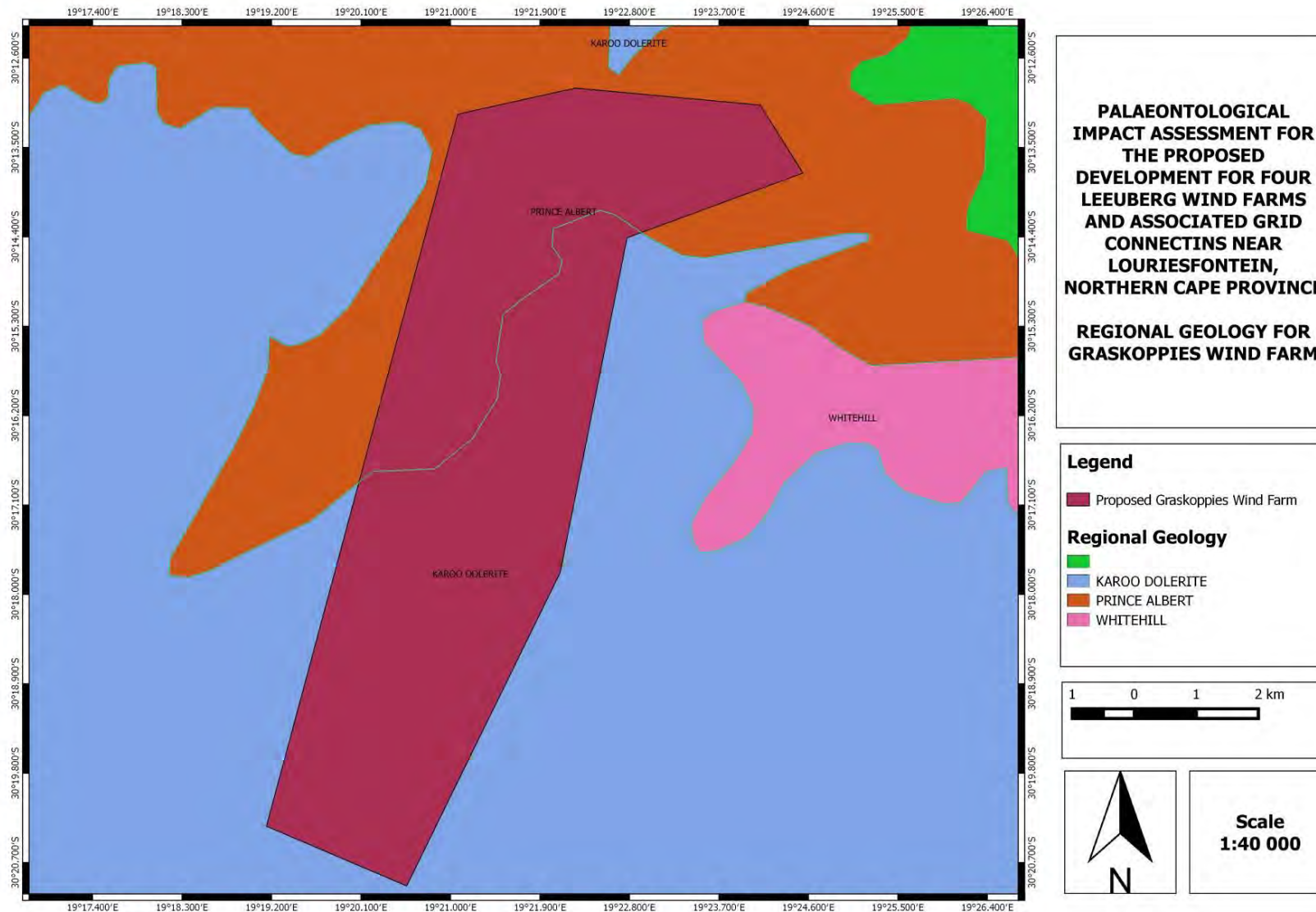


Figure 6: The surface geology of the proposed Graskoppies Wind Farm near Loeriesfontein in the Northern Cape Province. The development footprint is underlain by Karoo Dolerite as well as the Prince Albert and Whitehill Formations of the Ecca Group.

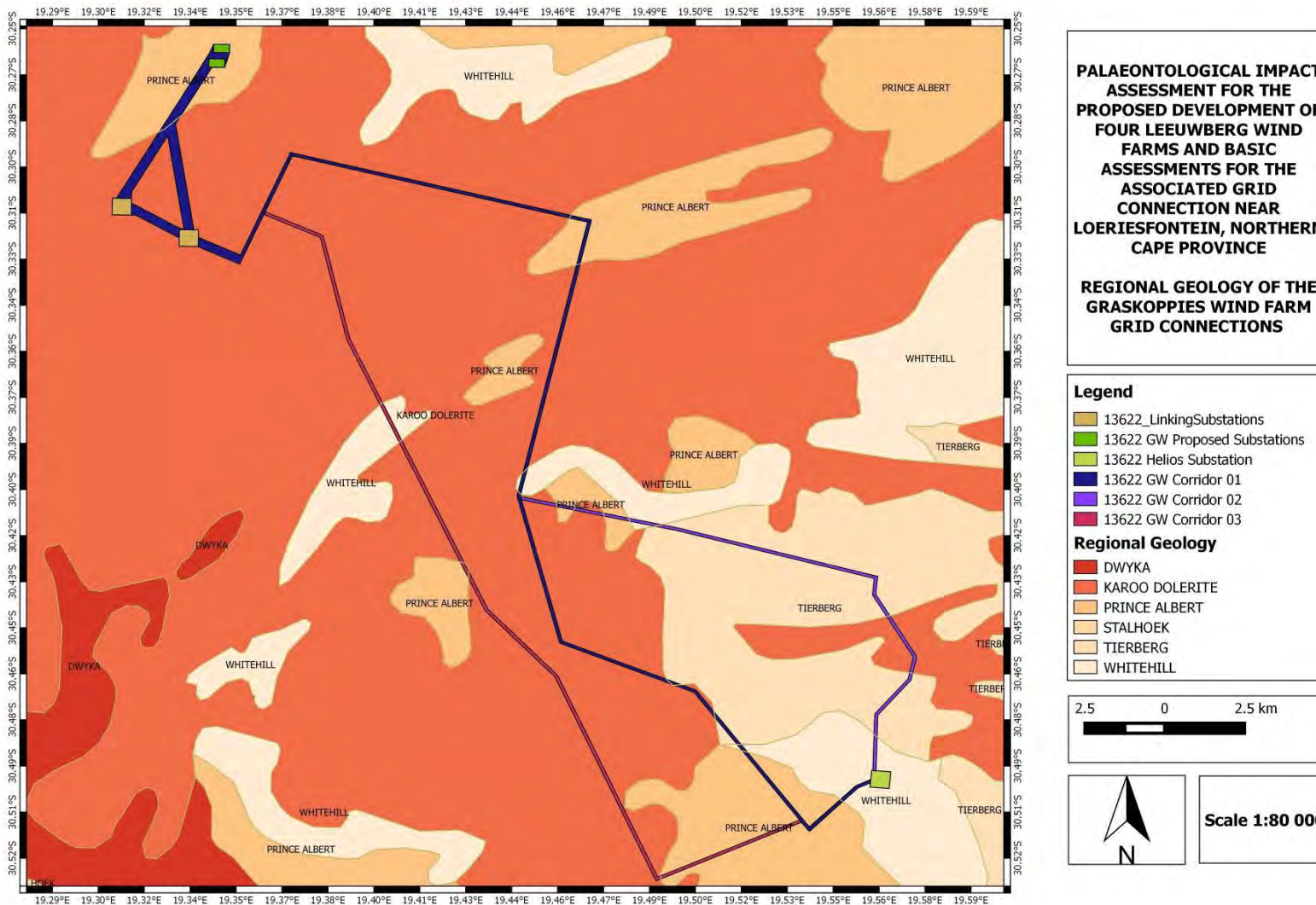


Figure 7: The surface geology of the proposed grid connection of Graskoppies Wind Farm near Loeriesfontein in the Northern Cape Province. The development footprint is underlain by Karoo Dolerite as well as the Prince Albert, Whitehill and Tierberg Formations of the Ecca Group.

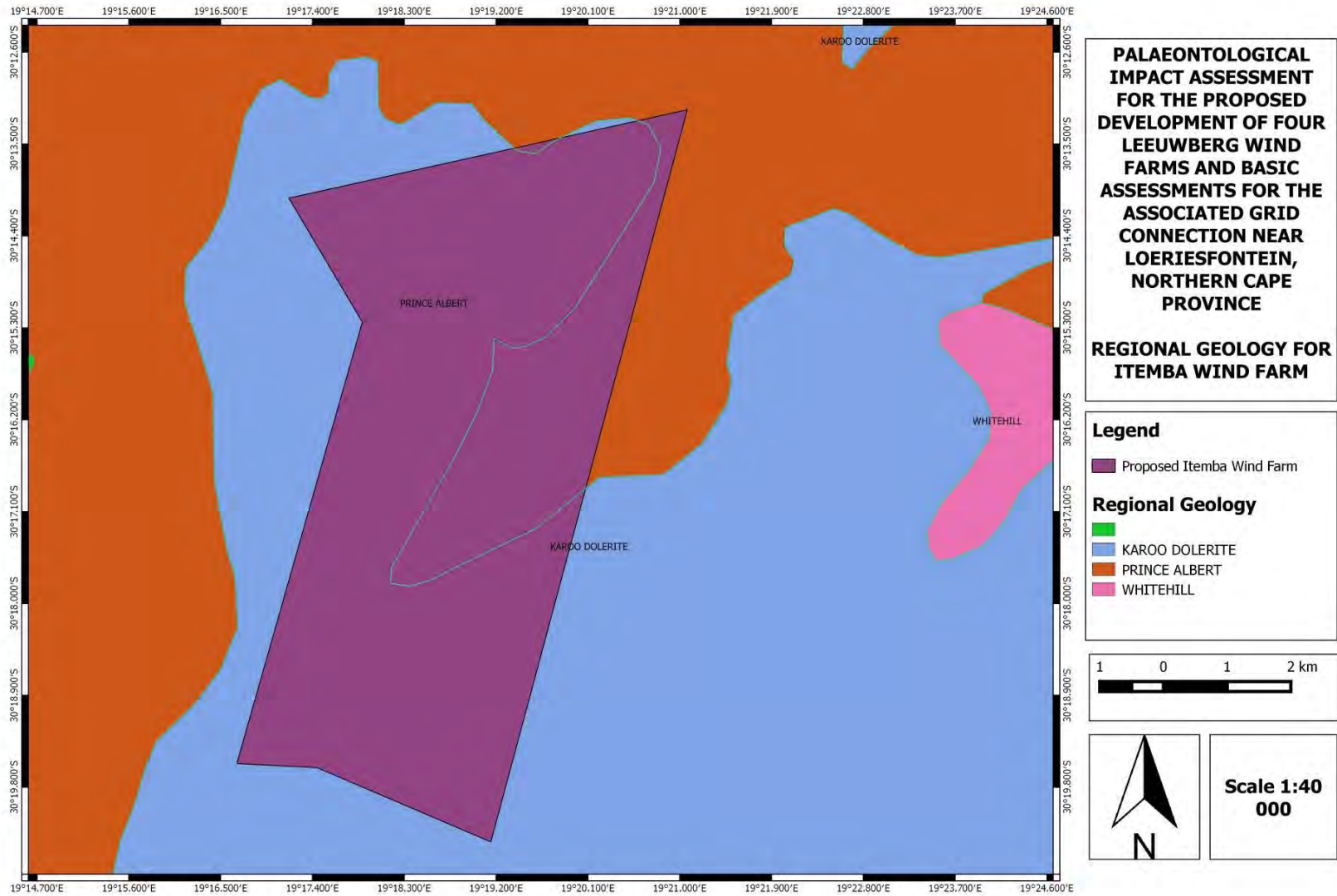


Figure 8: The surface geology of the proposed Itemba Wind Farm near Loeriesfontein in the Northern Cape Province. The development footprint is underlain by Karoo Dolerite as well as the Prince Albert and Whitehill Formations of the Ecca Group.

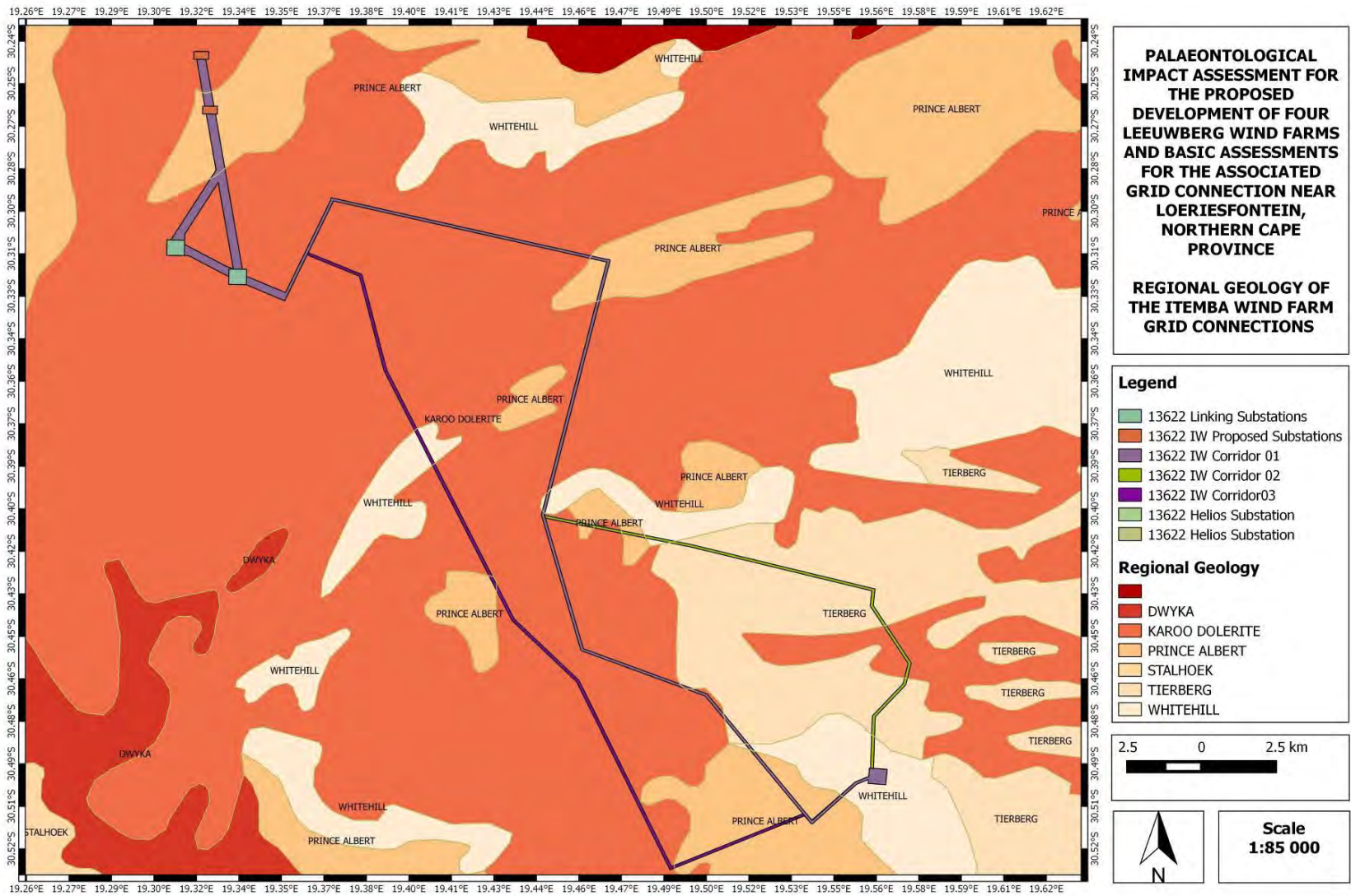


Figure 9: The surface geology of the proposed grid connection of the Itemba Wind Farm near Loeriesfontein in the Northern Cape Province. The development footprint is underlain by Karoo Dolerite as well as the Prince Albert, Whitehill and Tierberg Formations of the Ecca Group.

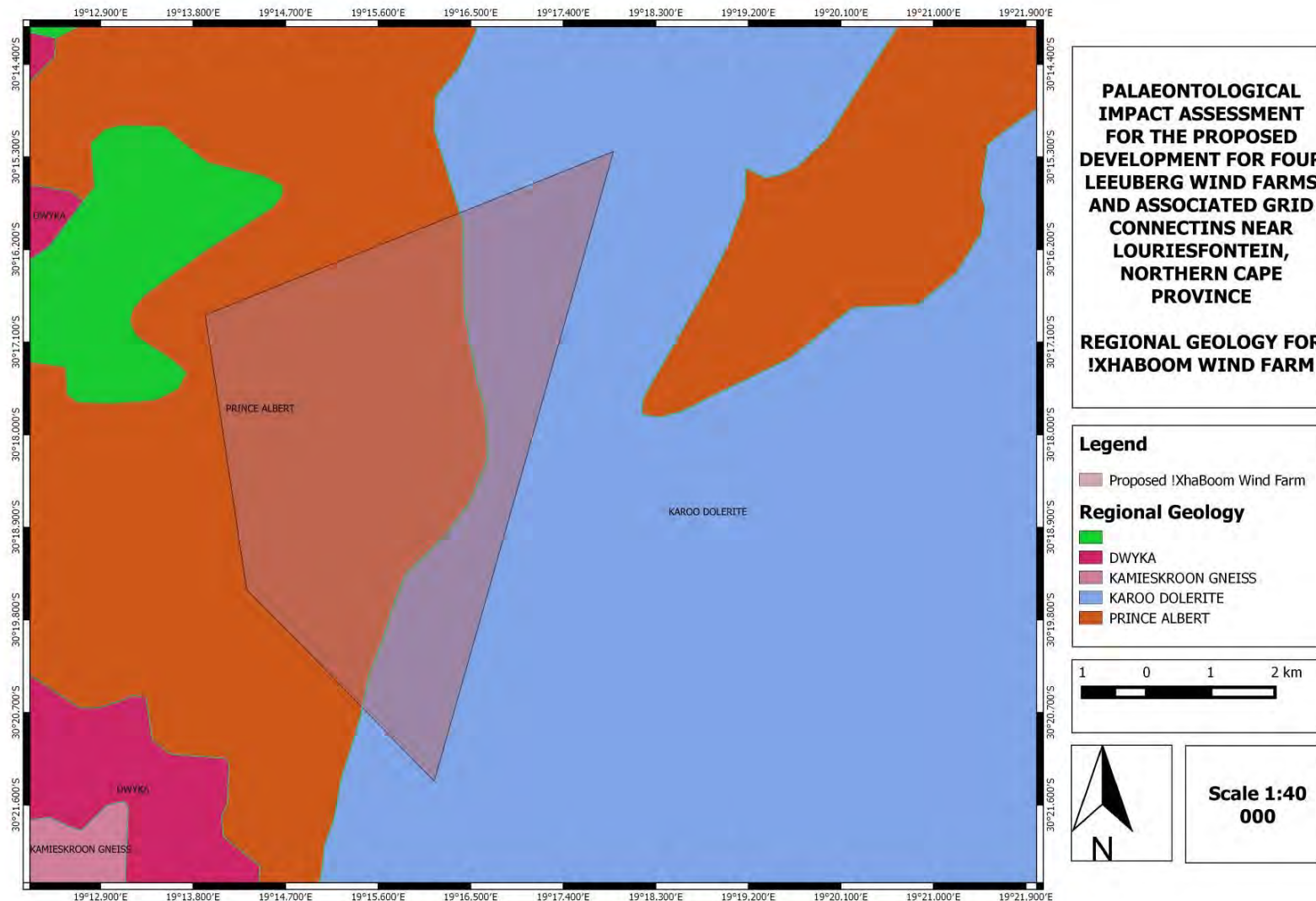


Figure 10: The surface geology of the proposed !XhaBoom Wind Farm near Loeriesfontein in the Northern Cape Province. The development footprint is underlain by Karoo Dolerite as well as the Prince Albert Formation of the Ecca Group.

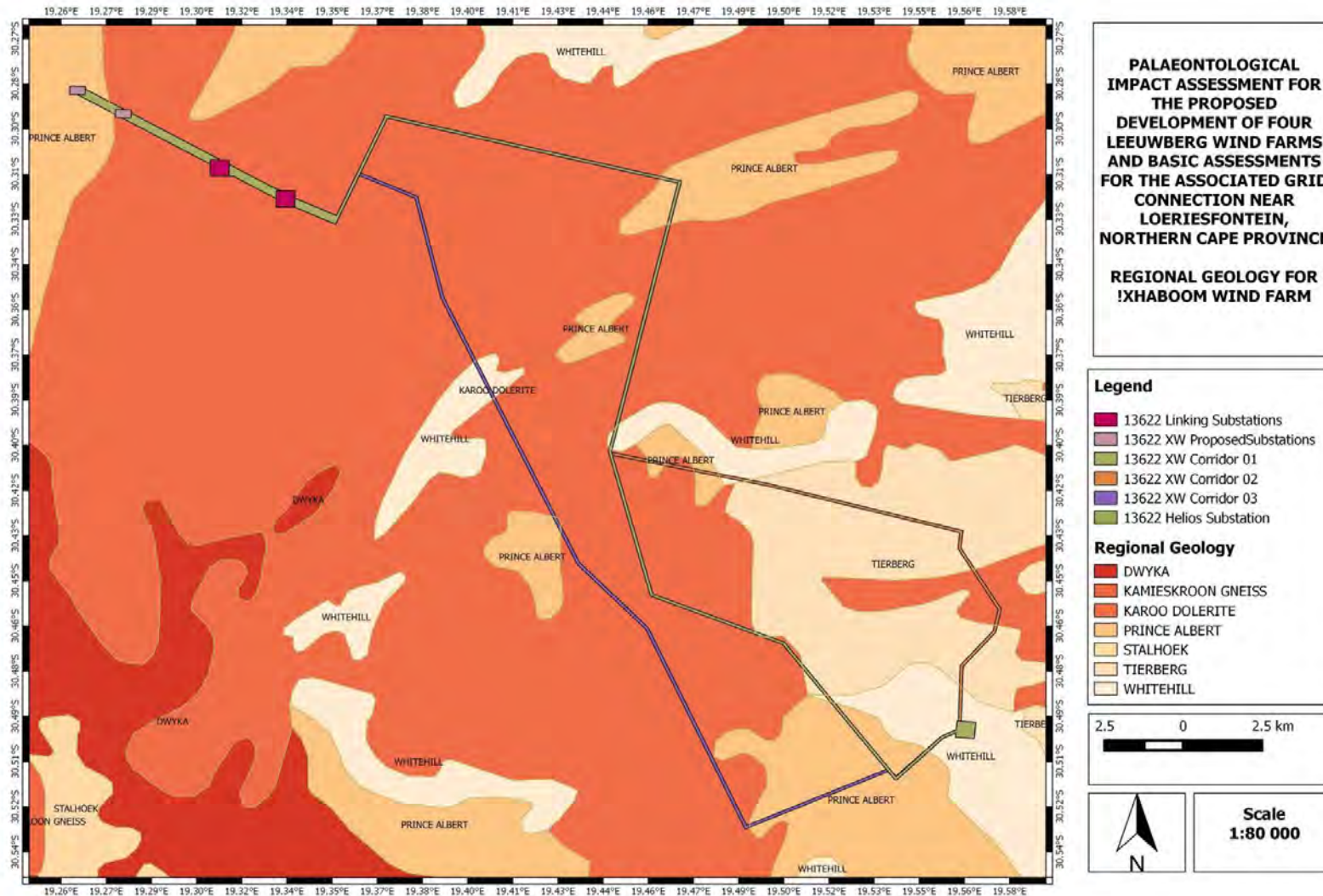


Figure 11: The surface geology of the proposed grid connection of the !XhaBoom Wind Farm near Loeriesfontein in the Northern Cape Province. The development footprint is underlain by Karoo Dolerite as well as the Prince Albert Formation of the Ecca Group.

6 GEOGRAPHICAL LOCATION OF THE SITE

6.1 Project Location

The Leeuwberg Wind Farm project area will be located approximately 62km north of Loeriesfontein, in the Khai-ma and Hantam Local Municipalities within the Northern Cape Province (Fig.1-2).

7 METHODS

A Palaeontological Scoping study was conducted on a desktop level to assess the potential risk to palaeontological material (fossil and trace fossils) within the site proposed for development. The author's experience, aerial photos (using Google Earth, 2015), topographical and geological maps and other reports from the same area were used to assess the site proposed for the development.

8 ASSUMPTIONS AND LIMITATIONS

The accuracy and reliability of desktop Palaeontological Impact Assessments as components of heritage impact assessments are normally limited by the following restrictions:

- Old fossil databases that have not been kept up-to-date or are not computerised. These databases do not always include relevant locality or geological information. South Africa has a limited number of professional palaeontologists that carry out fieldwork and most development study areas have never been surveyed by a palaeontologist
- The accuracy of geological maps where information may be based solely on aerial photographs and small areas of significant geology have been ignored. The sheet explanations for geological maps are inadequate and little to no attention is paid to palaeontological material.
- Impact studies and other reports (e.g. of commercial mining companies) - is not readily available for desktop studies.

Large areas of South Africa have not been studied palaeontologically. Fossil data collected from different areas but in similar Assemblage Zones might however provide insight on the possible occurrence of fossils in an unexplored area. Desktop studies of this nature therefore usually assume the presence of unexposed fossil heritage within study areas of similar geological formations. Where considerable exposures of bedrocks or potentially fossiliferous superficial sediments are present in the study area, the reliability of a Palaeontological Impact Assessment may be significantly improved through field-survey by a professional palaeontologist.

9 IMPACT ASSESSMENTS

An assessment of the impact significance of the proposed construction of four Leeuwberg Wind Farms and four grid connections near Loeriesfontein in the Northern Cape Province and associated infrastructure on local fossil heritage is presented here:

9.1 Nature of the impact

The excavations and site clearance will involve substantial excavations into the superficial sediment cover as well as locally into the underlying bedrock. These excavations will modify the existing topography and may disturb damage, destroy or permanently seal-in fossils at or below the ground surface that are then no longer available for scientific research. According to the Geology of the development site there is a possibility of finding fossils in the Dwyka and Ecca Groups but the palaeontological sensitivity is low (see description).

9.2 Sensitive areas

The broader area, including the site proposed for the wind farms is underlain by the Permo-Carboniferous Dwyka Group and Early to Middle Permian basinal mudrocks of the lower part of the Ecca Group (Karoo Supergroup, Prince Albert Formation, Whitehill Formation and Tierberg Formation). The Dwyka and Ecca Group has a low significance in Palaeontological terms.

9.3 Geographical extent of impact

The impact on fossil materials and thus palaeontological heritage will be limited to the construction phase when new excavations into fresh potentially fossiliferous bedrock take place. The extent of the area of potential impact is thus restricted to the project site and therefore categorised as **local**.

9.4 Duration of impact

The expected duration of the impact is assessed as potentially permanent to **long term**.

9.5 Potential significance of the impact

The Permo-Carboniferous Dwyka Group and Early to Middle Permian lower part of the Ecca Group are known to be of **low significance** in Palaeontological terms.

9.6 Severity / benefit scale

The proposed project is potentially **beneficial** on not only a local level, but regional and national levels as well. The wind farm will provide a long term benefit to the community in terms of the provision of electricity from a renewable energy resource to a progressively stressed national electricity grid

9.7 Intensity

The intensity of the impact on fossil heritage is rated as low.

9.8 Probability of the impact occurring

The development footprint is underlain by the Permo-Carboniferous Dwyka Group and Early to Middle Permian basinal mudrocks of the lower part of the Ecca Group (Karoo Supergroup). These assemblage zones are known to be fossiliferous, but due to poor preservation and weathering the **impact on fossil heritage is rated as low**. The intrusive Karoo dolerites are of no palaeontological significance and the Late Caenozoic superficial deposits are generally of very low palaeontological sensitivity

10 DAMAGE MITIGATION, REVERSAL AND POTENTIAL IRREVERSIBLE LOSS

10.1 Mitigation

Fossil heritage is present in the development footprint, but due to the preservation and scarcity of fossil heritage no mitigation measures are recommended.

10.2 Degree of irreversible loss

The Permo-Carboniferous Dwyka Group and Early to Middle Permian rocks of the lower part of the Ecca Group are known to be fossiliferous but due to preservation and weathering the irreplaceable loss of resources is rated as low.

10.3 Degree to which the impact may cause irreplaceable loss of resources

The Permo-Carboniferous Dwyka Group and Early to Middle Permian rocks of the lower part of the Ecca Group are known to be fossiliferous, but due to preservation and weathering the irreplaceable loss of resources is rated as **insignificant**.

10.4 Cumulative impacts

The cumulative effect of the development of the proposed construction of four Leeuwberg Wind Farms near Loeriesfontein in the Northern Cape is considered to be low. This is as a result of the broader Loeriesfontein area not having numerous well preserved fossils.

11 FINDINGS AND RECOMMENDATIONS

The development footprint is underlain by the Permo-Carboniferous Dwyka Group and Early to Middle Permian basinal mudrocks of the lower part of the Ecca Group (Karoo Supergroup). This include the Prince Albert, Whitehill and Tierberg Formations (in order of decreasing age). Permian and Jurassic bedrocks are mantled with a range of superficial deposits, mostly Late Caenozoic (Quaternary to Recent) in age. The intrusive Karoo dolerites are of no palaeontological significance and the Late Caenozoic superficial deposits are generally of low palaeontological sensitivity.

Fossil material of aquatic vertebrates (fish, mesosaurid reptiles,) invertebrates (*e.g.* crustaceans) and petrified wood is known from the Whitehill Formation. These fossils are more scarce in the Prince Albert and Tierberg Formations. However, fossils other than trace assemblages are generally scarce and most of the Ecca sediments are of low overall palaeontological sensitivity. The proposed Leeuberg wind farm development is thus unlikely to pose a substantial threat to local fossil heritage.

In Palaeontological terms the significance is rated as LOW (negative). Consequently, pending the discovery of significant new fossil material here, no further specialist studies are considered to be necessary.

However, should fossil remains be discovered during any phase of construction, either on the surface or exposed by fresh excavations, the ECO responsible for these developments should be alerted immediately. Such discoveries ought to be protected (preferably *in situ*) and the ECO should alert SAHRA (South African Heritage Research Agency) so that appropriate mitigation (*e.g.* recording, sampling or collection) can be taken by a professional paleontologist.

The specialist involved would require a collection permit from SAHRA. Fossil material must be curated in an approved collection (*e.g.* museum or university collection) and all fieldwork and reports should meet the minimum standards for palaeontological impact studies developed by SAHRA.

12 IMPACT TABLE

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
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.

Table 1: Impact Assessment.

IMPACT TABLE	
Environmental Parameter	<i>Impact on the Palaeontology Heritage (fossils) of the development footprint</i>
Issue/Impact/Environmental Effect/Nature (E)	<p>The excavations and site clearance during the construction phase will involve substantial excavations into the superficial sediment cover as well as locally into the underlying bedrock. These excavations will modify the existing topography and may disturb, damage, destroy or permanently seal-in fossils at or below the ground surface that are then no longer available for scientific research.</p> <p>This impact is likely to occur only during the construction phase. No impacts are expected to occur during the operation phase.</p>
<i>Extent</i>	The Leeuwborg Wind Farm project area will be located approximately 62km north of Loeriesfontein, in the Khai-ma and Hantam Local Municipalities within the Northern Cape Province.
<i>Probability</i>	<p>The development footprint is underlain by the Permo-Carboniferous Dwyka Group and Early to Middle Permian basinal mudrocks of the lower part of the Ecca Group (Karoo Supergroup). Permian and Jurassic bedrocks are mantled with a range of superficial deposits, mostly Late Caenozoic (Quaternary to Recent) in age. The intrusive Karoo dolerites are of no palaeontological significance and the Late Caenozoic superficial deposits are generally of very low palaeontological sensitivity.</p> <p>The probability of significant impacts on palaeontological heritage during the construction phase is low.</p>
<i>Reversibility</i>	<p>Impacts on fossil heritage are generally irreversible. Well-documented records and further palaeontological studies of any fossils exposed during construction would represent a positive impact from a scientific perspective. The possibility of a negative impact on the palaeontological heritage of the area can be reduced by the implementation of adequate damage mitigation procedures. If damage mitigation is properly undertaken the benefit scale for the project will lie within the beneficial category.</p> <p><i>Fossil Heritage is expected and</i> fossils other than trace assemblages are generally scarce and most of the Ecca sediments are of low overall palaeontological sensitivity.</p>

<i>Irreplaceable loss of resources</i>	The development footprint is underlain by the Permo-Carboniferous Dwyka Group and Early to Middle Permian basinal mudrocks of the lower part of the Eccca Group and is rated as insignificant loss of resources	
<i>Duration</i>	The expected duration of the impact is assessed as potentially permanent to long term . In the absence of mitigation procedures (should fossil material be present within the affected area) the damage or destruction of any palaeontological materials will be permanent	
<i>Cumulative effect</i>	<p>Low Cumulative Impact</p> <p>The cumulative effect of the development area within the proposed location is considered to be low. The broader area near Loeriesfontein is underlain by the Dwyka, Lower Eccca, Karoo Dolerite and Late Caenozoic deposits. Karoo Dolerite is unfossiliferous while the fossil sensitivity in the Caenozoic is low. Fossils other than trace assemblages are generally scarce and most of the Eccca and Dwyka sediments are of low overall palaeontological sensitivity.</p>	
<i>Intensity/magnitude</i>	Probable significant impacts on palaeontological heritage during the construction phase are high, but the intensity of the impact on fossil heritage is rated as low	
<i>Significance Rating</i>	<i>A brief description of the importance of an impact which in turn dictates the level of mitigation required</i>	
	Pre-mitigation impact rating	Post mitigation impact rating
Extent	2	1
Probability	2	1
Reversibility	2	1
Irreplaceable loss	2	1
Duration	4	1
Cumulative effect	2	1
Intensity/magnitude	2	1
Significance rating	-28 (low negative)	-6 (low negative)
Mitigation measures	Recommended mitigation of the inevitable damage and destruction of fossil within the proposed development area would involve the surveying, recording, description and collecting of fossils within	

	<p>the development footprint by a professional palaeontologist. This work should take place after initial vegetation clearance has taken place but <i>before</i> the ground is levelled for construction</p> <p>Impacts on fossil heritage are generally irreversible. Well-documented records and further palaeontological studies of any fossils exposed during construction would represent a positive impact from a scientific perspective. The possibility of a negative impact on the palaeontological heritage of the area can be reduced by the implementation of adequate damage mitigation procedures. If damage mitigation is properly undertaken the benefit scale for the project will lie within the beneficial category.</p> <p>Not deemed necessary as the Allanridge Formation is unfossiliferous.</p>
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

13 REFERENCES

- ALMOND, J.E. & PETHER, J. 2008a. Palaeontological heritage of the Northern Cape. Interim SAHRA technical report, 124 pp. Natura Viva cc., Cape Town.
- ALMOND, J.E. 2002. Giant arthropod trackway, Ecca Group. *Geobulletin* 45: p28.
- ANDERSON, A.M. & MCLACHLAN, I.R. 1976. The plant record in the Dwyka and Ecca Series (Permian) of the south-western half of the Great Karoo Basin, South Africa. *Palaeontologia Africana* 19: 31-42.
- ANDERSON, A.M. 1974. Arthropod trackways and other trace fossils from the Early Permian lower Karoo Beds of South Africa. Unpublished PhD thesis, University of Witwatersrand, Johannesburg, 172 pp.
- ANDERSON, A.M. 1975. Turbidites and arthropod trackways in the Dwyka glacial deposits (Early Permian) of southern Africa. *Transactions of the Geological Society of South Africa* 78: 265-273.
- ANDERSON, A.M. 1981. The *Umfolozia* arthropod trackways in the Permian Dwyka and Ecca Groups of South Africa. *Journal of Paleontology* 55: 84-108, pls. 1-4.
- EVANS, F.J. & BENDER, P.A. 1999. The Permian Whitehill Formation (Ecca Group) of South Africa: a preliminary review of palaeoniscoid fishes and taphonomy. *Records of the Western Australian Museum Supplement No. 57*: 175-181.
- JOHNSON, M.R., ANHAEUSSER, C.R. and THOMAS RJ (Eds) (2006). *The Geology of South Africa*. GSSA, Council for Geoscience, Pretoria. Rubidge BS (ed) 1995. *Biostratigraphy of the Beaufort Group (Karoo Supergroup)*, South Africa. South African Committee for Stratigraphy.

MACRAE, C. 1999. Life etched in stone. Fossils of South Africa, 305 pp. The Geological Society of South Africa, Johannesburg.

NICOLAS, M. & RUBIDGE, B.S. 2010. Changes in Permo-Triassic terrestrial tetrapod ecological representation in the Beaufort Group (Karoo Supergroup) of South Africa. *Lethaia* 43, 45-59.

NICOLAS, M.V. 2007. Tetrapod diversity through the Permo-Triassic Beaufort Group (Karoo Supergroup) of South Africa. Unpublished PhD thesis, University of Witwatersrand, Johannesburg.

SMITH, R., RUBIDGE, B. AND VAN DER WALT, M. 2012. Therapsid Biodiversity Patterns and Palaeoenvironments of the Karoo basin, South Africa in ed. Chinsamy Turan, A. *Forerunners of Mammals*. Indiana University Press.

VAN DER WALT, M., DAY, M., RUBIDGE, B., COOPER, A.K. & NETTERBERG, I. 2010. A new GIS based biozone map of the Beaufort Group (Karoo Supergroup), South Africa. *Palaeontologia Africana* 45, 1-5.

VISSER, J.N.J. 1992. Deposition of the Early to Late Permian Whitehill Formation during a sea-level high stand in a juvenile foreland basin. *South African Journal of Geology* 95: 181-193.

12 June 2017

SiVEST Environmental Division
P O BOX 2921
Rivonia
2128



Attention: Mr. Stephan Jacobs

**SOUTH AFRICA MAINSTREAM RENEWABLE POWER DEVELOPMENTS (PTY) LTD –
GRASKOPPIES WIND ENERGY FACILITY (WEF) - HERITAGE IMPACT REPORT – CHANGE
OF FINAL LAYOUT**

PGS Heritage (Pty) Ltd was appointed by SiVEST Environmental Division to undertake a Heritage Impact Assessment (HIA) that forms part of the Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) for the Graskoppies Wind Energy Facility for South Africa Mainstream Renewable Power Developments (Pty) Ltd (Mainstream), near Loeriesfontein in the Northern Cape Province.

1. ORIGINAL ASSESSMENT

The completed HIA was based on the establishment of a WEF with a layout of 70 turbines. The findings of the HIA found that no identified heritage resources are affected by the proposed WEF layout and the overall impact with the implementation of the proposed management measures will be low negative.

2. CHANGE OF LAYOUT AND DESIGN

Mainstream have made some technical changes to the proposed Graskoppies Wind Farm near Loeriesfontein and have also subsequently amended the turbine layouts.

These changes consist of:

- **No. of turbines which Mainstream will be submitting in Final layout has been changed to 47.** Rather than the original 70 turbine layout which you assessed.
- **Range of turbine to be changed from 2 - 5MW to 4 – 8MW.** Mainstream will not be changing any of the assessed turbine parameters – Hub Height, Rotor Diameter, Max MW will remain the same.
- **Material for Turbine Towers to change from just Steel, to include Steel and**

Concrete – there will be no concrete batching on site, so it won't increase water usage, these will be pre-cast and transported in.

- **Mainstream has consolidated ALL EIA Phase Sensitivity Shapefiles, and removed these from the Buildable Area. Further, Mainstream has added an additional 20m to the entire Buildable Area, to cater for possible slight increase in hardstand area.**

2.1. Turbine layouts

The original turbine layout consisted of 70 turbines (**Figure 1**) while the new layout only contains 47 turbines (**Figure 2**).

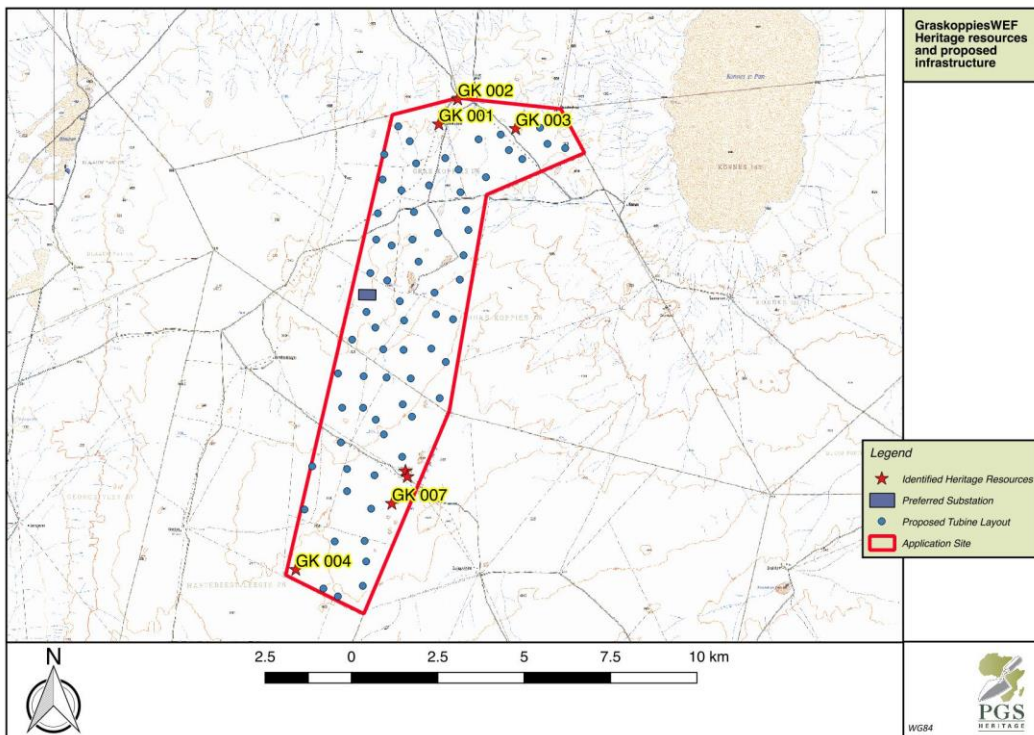


Figure 1: Propose Graskoppie WEF 70 turbine layout in relation to the identified heritage resources in the original HIA.

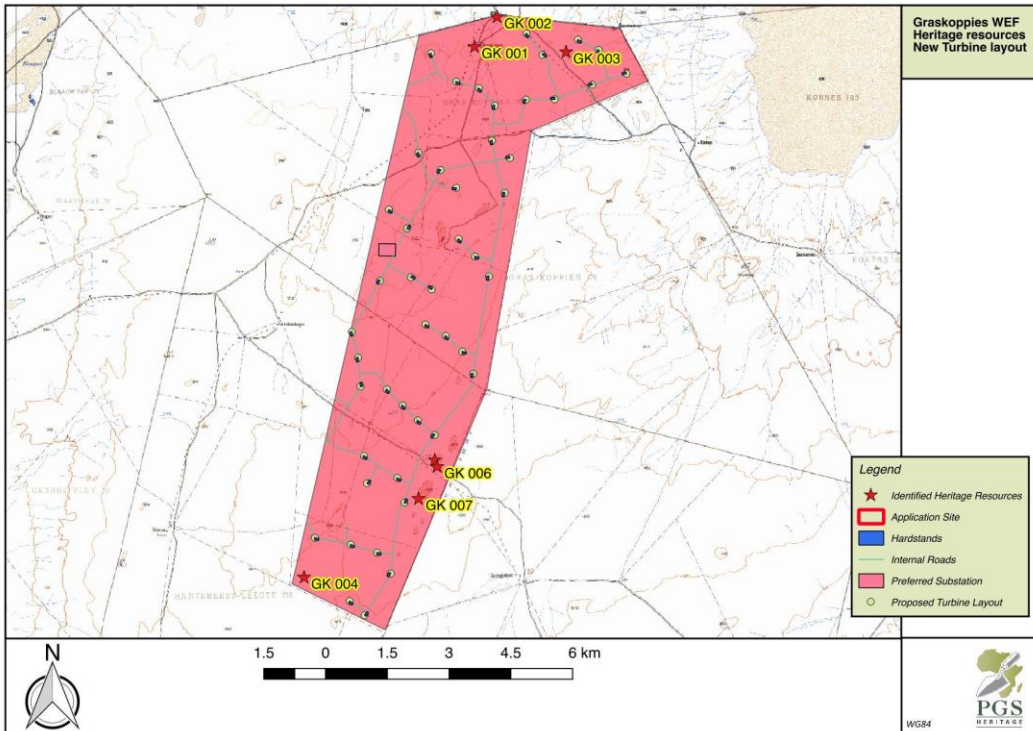


Figure 2: Propose Graskoppies WEF 47 turbine layout in relation to the identified heritage resources

The redesign of the turbine layout has resulted in the moving of turbine positions away from the identified heritage resources. The reduction of turbines and change in layout will also result in a reduction in foot print area and thus a reduction in the possibility of disturbing unidentified heritage resources. The additional hardstand areas is off set by the reduction in turbines and will show and overall footprint reduction.

This will inevitably result in a reduction of the overall impact of the WEF on heritage resources. The management recommendation as contained in the HIA document will be sufficient and still holds true for the new layout.

3. IMPACT STATEMENT

It is my considered opinion that the change in design layout will not have an additional negative impact by the proposed WEF on heritage resources. If at all it will result in a reduction of the projected impact as contained in the HIA for the project.

Any further queries can be directed to Mr. Wouter Fourie on +27 12 332 5305 or wouter@pgsheritage.co.za.

Regards,

A handwritten signature in black ink, appearing to read 'Wouter Fourie', is written over a set of three parallel diagonal lines that slope upwards from left to right.

Wouter Fourie

Accredited Professional Heritage Practitioner (APHP)

Accredited Professional Archaeologist (ASAPA)

PGS Heritage (Pty) Ltd