

29 November 2021

Ms T Ntshingila
ACWA POWER

To whom it may concern:

SPECIALIST OPINION FOR THE NEW INTERNAL COMBUSTION ENGINE (ICE) DEVELOPMENTS ASSOCIATED WITH THE AFRIKAANS AND SOTHO PV PLANT FOR PROJECT DAO (FORMERLY BOKPOORT SOLAR PHOTOVOLTAIC (PV) ENERGY FACILITY) NEAR GROBLERSHOOP, !KHEIS LOCAL MUNICIPALITY, NORTHERN CAPE PROVINCE

In May 2021, ACWA Power Project DAO (RF) Pty Ltd (hereafter ACWA Power) was issued with seven Environmental Authorisations (EAs) for the development of seven individual 9.9MW Internal Combustion Engines (ICE) on the authorised Pedi, Venda, Zulu, Afrikaans, Ndebele, Swati and Sotho Photovoltaic (PV) Plants on the Remaining Extent (RE) of the Farm Bokpoort 390, located 20km north west of the town of Groblershoop within the !Kheis Local Municipality in the ZF Mgcawu District Municipality, Northern Cape Province. PV can only generate electricity when the weather is favourable. In order to address this need, ACWA Power proposed additional infrastructure ICE within their authorised plants to create flexibility and efficiency within the plants which will enable electricity generation during unfavourable weather conditions.

In September 2020, the Department of Mineral Resources and Energy (DMRE) released a request for proposal as part of the Risk Mitigation Independent Power Producer Procurement Programme to reduce the current load shedding periods being experienced by the country. In responding to the request, ACWA Power submitted a bid for a 150MW (export capacity) PV plant that was bid as "Project DAO" and were successful. A condition in the Request for Proposal required Bidders to not tap into the national grid for power and requires that a reliability test be undertaken at a specified generation rate and time.

However, the DMRE informed bidders that these requirements would be relaxed, and ACWA Power decided to lapse four of the seven ICE EAs, the four EAs that have been lapsed are Zulu, Afrikaans, Sotho, and Swati PV Plant ICE. The DMRE has now confirmed that they are not relaxing the reliability run requirements, and as such, ACWA Power now needs two additional ICE infrastructure to meet these requirements. Each of the ICEs will be subject to its own application for Environmental Authorisation.

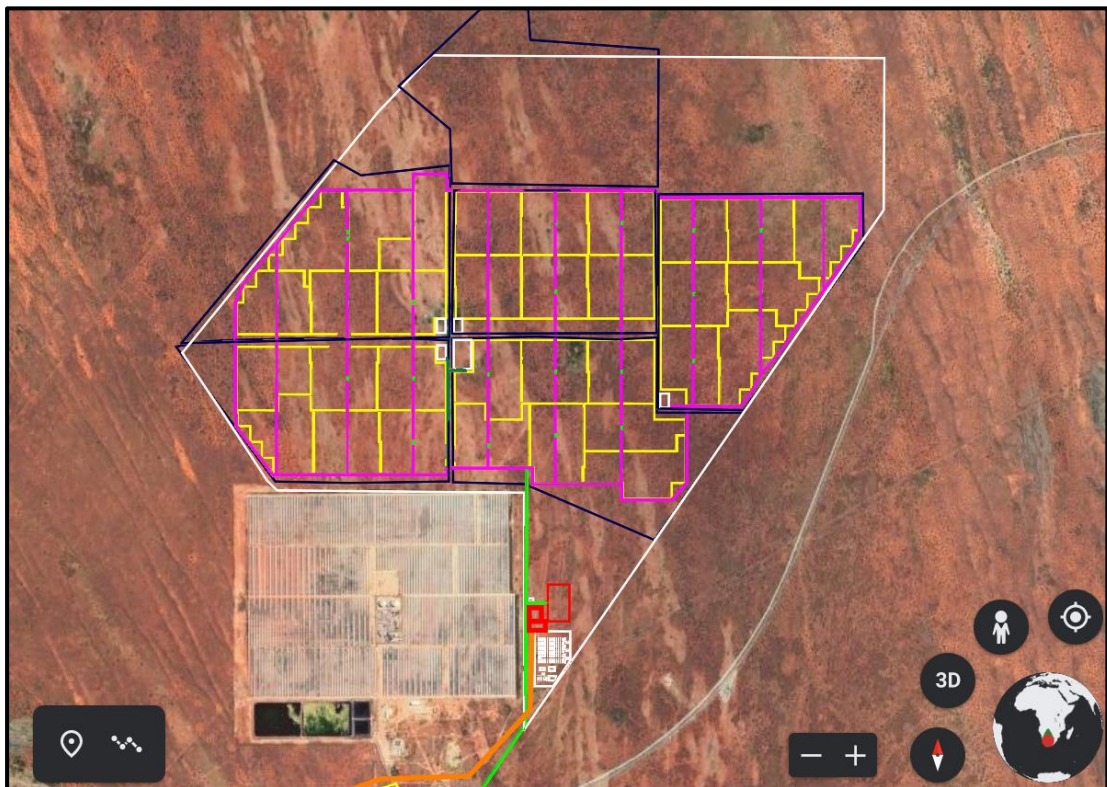
The specifications for each of the ICE associated with the Afrikaans and Sotho PV Plant are provided below:

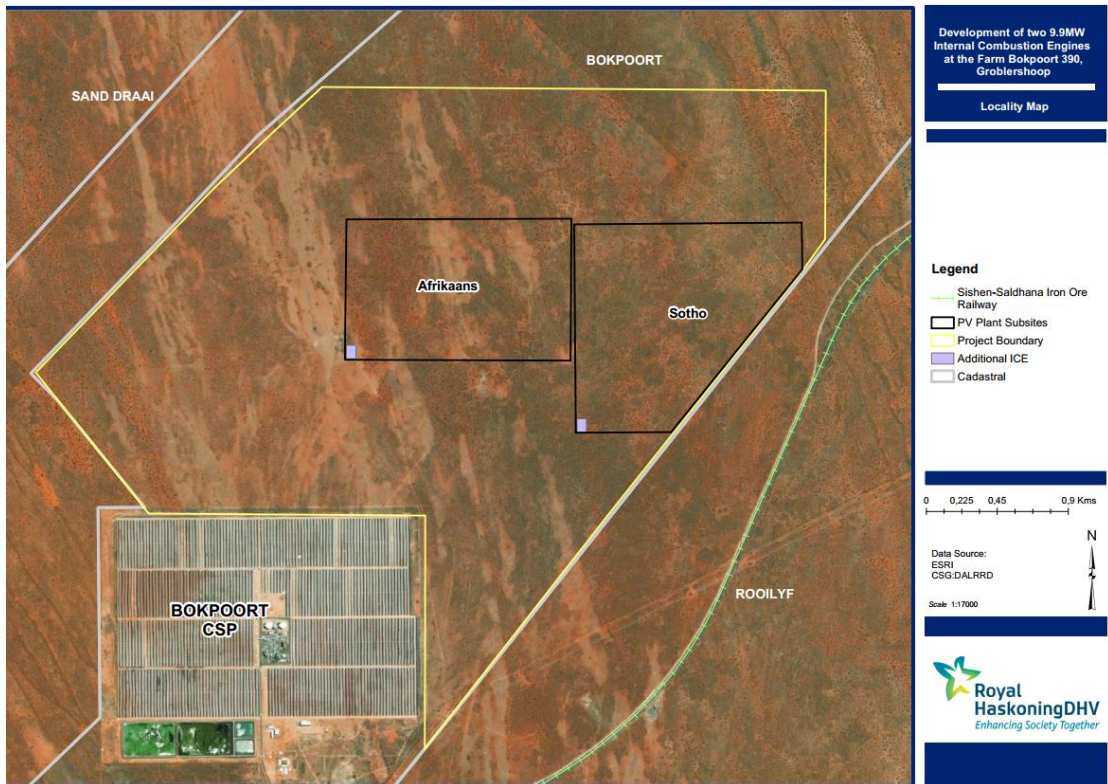
- Generating capacity: 9.9 MW
- Fuel Type: Diesel or Liquefied Petroleum Gas (LPG) or Liquefied Natural Gas (LNG)
- Stack height: 50 - 70 m
- Number of engines for the ICE: 1 (it is subject to the engine size, various load size available in the market)
- Fuel storage tanks: 5 (subject to the tanks sizing/designing)
- Fuel volume: 500 m³
- Water requirements: limited water for cooling

- Area size: 0.5 ha

Both options would be implemented within the area that has previously been subjected to a full heritage impact assessment and for which environmental authorisation has been granted.

We hereby confirm that the proposed amendments will not result in any additional impacts and will not increase the level or nature of the impact, which was initially assessed and considered when application was made for an EA. The significance ratings will remain unchanged and the proposed mitigation and management measures proposed as part of the EIA process will still suffice.





Location of the proposed new developments within the authorised area

We trust you find the above in order. If there are any uncertainties or additional information required, please feel free to contact the undersigned.

Yours sincerely

J A van Schalkwyk (D Litt et Phil)

- Heritage Consultant: ASAPA Registration No.: 164 - Principal Investigator: Iron Age, Colonial Period, Industrial Heritage.



Original Heritage Study

Phase 1 Cultural Heritage Impact Assessment:

**THE PROPOSED BOKPOORT II PV SOLAR POWER FACILITIES ON THE FARM BOKPOORT 390 NEAR
GROBLERSHOOP, !KHEIS LOCAL MUNICIPALITY, NORTHERN CAPE PROVINCE**

Prepared for:

Royal HaskoningDHV: Mr M Roods

- Address: P O Box 867, Gallo Manor, 2052, Gauteng, Tel: 087 352 1528; E-mail: Malcolm.Roods@rhdhv.com

Prepared by:

Report No: 2020/JvS/001

- Status: Final
- Date: January 2020
- Revision No: -
- Date: -



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Specialist competency:

Johan A van Schalkwyk, D Litt et Phil, heritage consultant, has been working in the field of heritage management for more than 40 years. Originally based at the National Museum of Cultural History, Pretoria, he has actively done research in the fields of anthropology, archaeology, museology, tourism and impact assessment. This work was done in Limpopo Province, Gauteng, Mpumalanga, North West Province, Eastern Cape Province, Northern Cape Province, Botswana, Zimbabwe, Malawi, Lesotho and Swaziland. Based on this work, he has curated various exhibitions at different museums and has published more than 70 papers, most in scientifically accredited journals. During this period, he has done more than 2000 impact assessments (archaeological, anthropological, historical and social) for various government departments and developers. Projects include environmental management frameworks, roads, pipeline-, and power line developments, dams, mining, water purification works, historical landscapes, refuse dumps and urban developments.

J A van Schalkwyk
Heritage Consultant
January 2020



SPECIALIST DECLARATION

I, J A van Schalkwyk, as the appointed independent specialist, in terms of the 2014 EIA Regulations (as amended), hereby declare that I:

- I act as the independent specialist in this application;
- I perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- regard the information contained in this report as it relates to my specialist input/study to be true and correct, and do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the NEMA, the Environmental Impact Assessment Regulations, 2014 (as amended) and any specific environmental management Act;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I have no vested interest in the proposed activity proceeding;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- I have ensured that information containing all relevant facts in respect of the specialist input/study was distributed or made available to interested and affected parties and the public and that participation by interested and affected parties was facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments on the specialist input/study;
- I have ensured that the comments of all interested and affected parties on the specialist input/study were considered, recorded and submitted to the competent authority in respect of the application;
- all the particulars furnished by me in this specialist input/study are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.

Signature of the specialist

J A van Schalkwyk
January 2020

EXECUTIVE SUMMARY

**Phase 1 Cultural Heritage Impact Assessment:
THE PROPOSED BOKPOORT II PV SOLAR POWER FACILITIES ON THE FARM BOKPOORT 390 NEAR
GROBLERSHOOP, !KHEIS LOCAL MUNICIPALITY, NORTHERN CAPE PROVINCE**

ACWA Power obtained 3 Environmental Authorisations in 2016 for 2 x 75MW PV facilities as well as a 150MW CSP facility. An EIA study was undertaken for the 75MW CSP plant in Bokpoort, Northern Cape and approved by Department of Environmental Affairs (DEA). In accordance with Section 38 of the National Heritage Resources Act, No. 25 of 1999, a heritage study (Dreyer 2015) was completed and submitted to SAHRA and was subsequently accepted by that authority.

However, ACWA Power Energy Africa (Pty) Ltd (formerly known as ACWA Power Africa Holdings) now proposes to, instead of the 150MW CSP facility, construct 8 x 200 MW PV plants in its place on the same footprint, which was assessed in 2016. Two PV Plants (Xhosa and Ndebele) have already been authorised but are undergoing another Basic Assessment (BA) study for the battery storage energy system (BESS) as well as the capacity increase from 75 to 200MW.

Royal HaskoningDHV (Pty) Ltd was contracted as independent environmental consultant to undertake the EIA process for the proposed construction of the 8 x 200 MW PV plants and the increased capacity and inclusion of BESS in the already authorised 2 PV projects.

In accordance with Section 38 of the NHRA, an independent heritage consultant was appointed by *Royal HaskoningDHV (Pty) Ltd* to conduct a cultural heritage assessment to determine if the construction of the PV plants and associated infrastructure would have an impact on any sites, features or objects of cultural heritage significance.

- As the total area was previously surveyed by Dreyer (2015), the purpose of the current survey was purely to verify his findings, as well as to assess the possible cumulative impact of the development as this was not done previously.

This report describes the methodology used, the limitations encountered, the heritage features that were identified and the recommendations and mitigation measures proposed relevant to this. It should be noted that the implementation of the mitigation measures is subject to SAHRA/PHRA's approval.

The cultural landscape qualities of the region are made up of a pre-colonial element consisting of Stone Age and a much later colonial (farmer) component, which eventually gave rise to an urban component which manifest in a number of small towns and an intensive farming industry.

Identified sites

Stone Age lithics dating to the MSA are found only as low-density surface scatters, which is confirmed by similar findings in the larger region by other researchers (Dreyer 2014, 2015; Morris 2014, 2018; van der Walt 2015; van Schalkwyk 2019). The density of artefacts is less than 1/50m².

- The low density of the lithic scatters is, on archaeological grounds, viewed to be of low significance and require no further action.

Impact assessment and proposed mitigation measures

Impact analysis of cultural heritage resources under threat of the proposed development, is based on the present understanding of the development:

- As no sites, features or objects of cultural significance are known to exist in the development area, there would be no impact as a result of the proposed development.

Heritage sites	Significance of impact	Mitigation measures
Bokpoort II Solar Power Plant: Construction Phase		
Without mitigation	n/a	n/a
With mitigation	n/a	n/a
Bokpoort II Solar Power Plant: Operation Phase		
Without mitigation	n/a	n/a
With mitigation	n/a	n/a

Cumulative impact assessment

The cultural heritage profile of the larger region is very limited and consists of isolated findspots of Stone Age (MSA) tools, farmsteads and burial sites. Consequently, the cumulative impact of the proposed development is viewed to be **low**

Site type	NHRA category	Field rating	Impact rating: Before/After mitigation
Archaeological sites/material	Section 35	Generally protected: Low significance – Grade IV-C	Low (16)
Burial sites and graves	Section 36	Generally protected: Low significance – Grade IV-A	Low (16)

Legal requirements

The legal requirements related to heritage specifically are specified in Section 3 of this report. For this proposed project, the assessment has determined that no sites, features or objects of heritage significance occur in the study area. If heritage features are identified during construction, as stated in the management recommendation, these finds would have to be assessed by a specialist, after which a decision will be made regarding the application for relevant permits.

Reasoned opinion as to whether the proposed activity should be authorised:

- From a heritage point of view, it is recommended that the proposed development be allowed to continue on acceptance of the proposed mitigation measures and the conditions proposed below.

Conditions for inclusion in the environmental authorisation:

- The Palaeontological Sensitivity Map (SAHRIS) indicate that the study area has a moderate sensitivity of fossil remains to be found and therefore a desktop palaeontological required.
- Should archaeological sites or graves be exposed in other areas during construction work, it must immediately be reported to a heritage practitioner so that an investigation and evaluation of the finds can be made.

J A van Schalkwyk
Heritage Consultant
January 2020

TECHNICAL SUMMARY

Project description	
Description	Development of 10 X 200MW Solar PV facilities
Project name	Bokpoort II Solar Power Plant (each individually identified as Afrikaans; Ndebele; Pedi; Sotho; Swati; Tsonga; Tswana; Venda; Xhosa; Zulu)

Applicant
ACWA Power Green Energy Africa (Pty) Ltd

Environmental assessors
Mr M Roods
Royal HaskoningDHV (Pty) Ltd

Property details																									
Province	Northern Cape																								
Magisterial district	Gordonia																								
Local municipality	!Kheis																								
Topo-cadastral map	2821DB, 2822CA																								
Farm name	Bokpoort																								
Closest town	Groblershoop																								
Coordinates	Corner points (approximate)																								
	<table border="1"> <thead> <tr> <th>No</th> <th>Latitude</th> <th>Longitude</th> <th>No</th> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>-28.73309</td> <td>22.00469</td> <td>2</td> <td>-28.71962</td> <td>22.00451</td> </tr> <tr> <td>3</td> <td>-28.71952</td> <td>21.98857</td> <td>4</td> <td>-28.71189</td> <td>21.98206</td> </tr> <tr> <td>5</td> <td>-28.67546</td> <td>22.02122</td> <td>6</td> <td>-28.69420</td> <td>22.03567</td> </tr> </tbody> </table>	No	Latitude	Longitude	No	Latitude	Longitude	1	-28.73309	22.00469	2	-28.71962	22.00451	3	-28.71952	21.98857	4	-28.71189	21.98206	5	-28.67546	22.02122	6	-28.69420	22.03567
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5	-28.67546	22.02122	6	-28.69420	22.03567																				

Development criteria in terms of Section 38(1) of the NHR Act	Yes/No
Construction of road, wall, power line, pipeline, canal or other linear form of development or barrier exceeding 300m in length	Yes
Construction of bridge or similar structure exceeding 50m in length	No
Development exceeding 5000 sq m	Yes
Development involving three or more existing erven or subdivisions	No
Development involving three or more erven or divisions that have been consolidated within past five years	No
Rezoning of site exceeding 10 000 sq m	No
Any other development category, public open space, squares, parks, recreation grounds	No

Land use	
Previous land use	Farming
Current land use	Farming

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GLOSSARY OF TERMS AND ABBREVIATIONS

TERMS

Bioturbation: The burrowing by small mammals, insects and termites that disturb archaeological deposits.

Cumulative impacts: “Cumulative Impact”, in relation to an activity, means the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may become significant when added to existing and reasonably foreseeable impacts eventuating from similar or diverse activities.

Debitage: Stone chips discarded during the manufacture of stone tools.

Factory site: A specialised archaeological site where a specific set of technological activities has taken place – usually used to describe a place where stone tools were made.

Historic Period: Since the arrival of the white settlers - c. AD 1830 - in this part of the country.

Holocene: The most recent time period, which commenced c. 10 000 years ago.

Iron Age (also referred to as **Early Farming Communities**): Period covering the last 1800 years, when new people brought a new way of life to southern Africa. They established settled villages, cultivated domestic crops such as sorghum, millet and beans, and they herded cattle as well as sheep and goats. As they produced their own iron tools, archaeologists call this the Iron Age.

Early Iron Age	AD 200 - AD 900
Middle Iron Age	AD 900 - AD 1300
Later Iron Age	AD 1300 - AD 1830

Midden: The accumulated debris resulting from human occupation of a site.

Mitigation, means to anticipate and prevent negative impacts and risks, then to minimise them, rehabilitate or repair impacts to the extent feasible.

National Estate: The collective heritage assets of the Nation.

Pleistocene: Geological time period of 3 000 000 to 20 000 years ago.

Stone Age: The first and longest part of human history is the Stone Age, which began with the appearance of early humans between 3-2 million years ago. Stone Age people were hunters, gatherers and scavengers who did not live in permanently settled communities. Their stone tools preserve well and are found in most places in South Africa and elsewhere.

Early Stone Age	2 500 000 - 250 000 Before Present
Middle Stone Age	250 000 - 40-25 000 BP
Later Stone Age	40-25 000 - until c. AD 200

Tradition: As used in archaeology, it is a seriated sequence of artefact assemblages, particularly ceramics.

ACRONYMS and ABBREVIATIONS

AD	Anno Domini (the year 0)
ASAPA	Association of Southern African Professional Archaeologists
BC	Before the Birth of Christ (the year 0)
BCE	Before the Common Era (the year 0)
BP	Before Present (calculated from 1950 when radio-carbon dating was established)
CE	Common Era (the year 0)
CRM	Cultural Resources Management
EAP	Environmental Assessment Practitioner
EIA	Early Iron Age
ESA	Early Stone Age
HIA	Heritage Impact Assessment
I & AP's	Interested and Affected Parties
ICOMOS	International Council on Monuments and Sites
LIA	Late Iron Age
LSA	Later Stone Age
MIA	Middle Iron Age
MSA	Middle Stone Age
NASA	National Archives of South Africa
NHRA	National Heritage Resources Act
PHRA	Provincial Heritage Resources Agency
SAHRA	South African Heritage Resources Agency
SAHRIS	South African Heritage Resources Information System

COMPLIANCE WITH APPENDIX 6 OF THE 2014 EIA REGULATIONS (AS AMENDED)

Requirements of Appendix 6 – GN R982	Addressed in the Specialist Report
1. (1) A specialist report prepared in terms of these Regulations must contain-	
a) details of-	
i. the specialist who prepared the report; and	Front page
ii. the expertise of that specialist to compile a specialist report including a curriculum vitae;	Page i Addendum Section 6
b) a declaration that the specialist is independent in a form as may be specified by the competent authority;	Page ii
c) an indication of the scope of, and the purpose for which, the report was prepared;	Section 1
(cA) an indication of the quality and age of base data used for the specialist report;	Section 4
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 7.3
d) the duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment;	Section 4.2.2
e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used;	Section 4
f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;	Addendum Section 5; Figure 13
g) an identification of any areas to be avoided, including buffers;	Section 8
h) a map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Figure 13 Addendum Section 5
i) a description of any assumptions made and any uncertainties or gaps in knowledge;	Section 2
j) a description of the findings and potential implications of such findings on the impact of the proposed activity or activities;	Section 7
k) any mitigation measures for inclusion in the EMPr;	Section 9 & 10
l) any conditions for inclusion in the environmental authorisation;	Section 10
m) any monitoring requirements for inclusion in the EMPr or environmental authorisation;	Section 9
n) a reasoned opinion-	
i. whether the proposed activity, activities or portions thereof should be authorised;	Section 10
(iiA) regarding the acceptability of the proposed activity or activities; and	
ii. if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan;	Section 8, 9, 10
o) a description of any consultation process that was undertaken during the course of preparing the specialist report;	Formed part of the original assessment
p) a summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	Formed part of the original assessment
q) any other information requested by the competent authority.	Formed part of the original assessment
(2) Where a government notice by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	-

**Phase 1 Cultural Heritage Impact Assessment:
THE PROPOSED BOKPOORT II PV SOLAR POWER FACILITIES ON THE FARM BOKPOORT 390 NEAR
GROBLERSHOOP, !KHEIS LOCAL MUNICIPALITY, NORTHERN CAPE PROVINCE**

1. INTRODUCTION

1.1 Background

ACWA Power obtained 3 Environmental Authorisations in 2016 for 2 x 75MW PV facilities as well as a 150MW CSP facility. An EIA study was undertaken for the 75MW CSP plant in Bokpoort, Northern Cape and approved by Department of Environmental Affairs (DEA). In accordance with Section 38 of the National Heritage Resources Act, No. 25 of 1999, a heritage study (Dreyer 2015) was completed and submitted to SAHRA and was subsequently accepted by that authority.

However, ACWA Power Energy Africa (Pty) Ltd (formerly ACWA Power Africa Holdings) now proposes to, instead of the 150MW CSP facility, construct 8 x 200 MW PV plants in its place on the same footprint, which was assessed in 2016. Two PV Plants (Xhosa and Ndebele) have already been authorised but are undergoing another Basic Assessment (BA) study for the battery storage energy system (BESS) as well as the capacity increase from 75 to 200MW.

Royal HaskoningDHV (Pty) Ltd was contracted as independent environmental consultant to undertake the EIA process for the proposed construction of the 8 x 200 MW PV plants, and the increased capacity and inclusion of BESS in the already authorised 2 PV projects.

South Africa's heritage resources, also described as the 'national estate', comprise a wide range of sites, features, objects and beliefs. However, according to Section 27(18) of the National Heritage Resources Act (NHRA), No. 25 of 1999, no person may destroy, damage, deface, excavate, alter, remove from its original position, subdivide or change the planning status of any heritage site without a permit issued by the heritage resources authority responsible for the protection of such site.

In accordance with Section 38 of the NHRA, an independent heritage consultant was appointed by *Royal HaskoningDHV (Pty) Ltd* to conduct a cultural heritage assessment to determine if the construction of the 10, 200 MW PV plants and associated infrastructure would have an impact on any sites, features or objects of cultural heritage significance.

- As the total area was previously surveyed by Dreyer (2015), the purpose of the current survey was purely to verify his findings, as well as to assess the possible cumulative impact of the development as this was not done previously.

This report forms part of the Environmental Impact Assessment (EIA) as required by the EIA Regulations in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) as amended and is intended for submission to the South African Heritage Resources Agency (SAHRA).

1.2 Terms and references

The aim of a full HIA investigation is to provide an informed heritage-related opinion about the proposed development by an appropriate heritage specialist. The objectives are to identify heritage resources (involving site inspections, existing heritage data and additional heritage specialists if necessary); assess their significances; assess alternatives in order to promote heritage conservation issues; and to assess the acceptability of the proposed development from a heritage perspective.

The result of this investigation is a heritage impact assessment report indicating the presence/absence of heritage resources and how to manage them in the context of the proposed development.

Depending on SAHRA's acceptance of this report, the developer will receive permission to proceed with the proposed development, on condition of successful implementation of proposed mitigation measures.

1.2.1 Scope of work

The aim of this study is to determine if any sites, features or objects of cultural heritage significance occur within the boundaries of the area where the 8 x 200 MW PV plants and the increased capacity and inclusion of BESS in the already authorised 2 PV projects is to take place. This included:

- Conducting a desk-top investigation of the area;
- A visit to the proposed development site.

The objectives were to:

- Identify possible archaeological, cultural and historic sites within the proposed development areas;
- Identify any potential 'fatal flaws' related to the proposed development;
- Evaluate the potential impacts of construction, operation and maintenance of the proposed development on archaeological, cultural and historical resources;
- Recommend mitigation measures to ameliorate any negative impacts on areas of archaeological, cultural or historical importance;
- Provide guideline measures to manage any impacts that might occur during the construction phase as well as the implementation phase.

1.2.2 Assumptions and Limitations

The investigation has been influenced by the following factors:

- It is assumed that the description of the proposed project, provided by the client, is accurate.
- The unpredictability of buried archaeological remains.
- No subsurface investigation (i.e. excavations or sampling) were undertaken, since a permit from SAHRA is required for such activities.
- It is assumed that the public consultation process undertaken as part of the Environmental Impact Assessment (EIA) is sufficient and that it does not have to be repeated as part of the heritage impact assessment.

2. LEGISLATIVE FRAMEWORK

2.1 Background

Heritage Impact Assessments are governed by national legislation and standards and International Best Practise. These include:

- South African Legislation
 - National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA);
 - Mineral and Petroleum Resources Development Act, 2002 (Act No. 22 of 2002) (MPRDA);
 - National Environmental Management Act 1998 (Act No. 107 of 1998) (NEMA); and
 - National Water Act, 1998 (Act No. 36 of 1998) (NWA).
- Standards and Regulations
 - South African Heritage Resources Agency (SAHRA) Minimum Standards;
 - Association of Southern African Professional Archaeologists (ASAPA) Constitution and Code of Ethics;
 - Anthropological Association of Southern Africa Constitution and Code of Ethics.
- International Best Practise and Guidelines
 - ICOMOS Standards (Guidance on Heritage Impact Assessments for Cultural World Heritage Properties); and
 - The UNESCO Convention concerning the Protection of the World Cultural and Natural Heritage (1972).

2.2 Heritage Impact Assessment Studies

South Africa's unique and non-renewable archaeological and palaeontological heritage sites are 'generally' protected in terms of the National Heritage Resources Act (Act No 25 of 1999, Section 35) and may not be disturbed at all without a permit from the relevant heritage resources authority.

The National Heritage Resources Act (Act No. 25 of 1999, Section 38) provides guidelines for Cultural Resources Management and prospective developments:

"38 (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as:

- (a) the construction of a road, wall, powerline, 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 or a provincial heritage resources authority;*
- (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."*

And:

"38 (3) The responsible heritage resources authority must specify the information to be provided in a report required in terms of subsection (2)(a): Provided that the following must be included:

- (a) The identification and mapping of all heritage resources in the area affected;*
- (b) an assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6(2) or prescribed under section 7;*
- (c) an assessment of the impact of the development on such heritage resources;*
- (d) an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development;*
- (e) the results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources;*
- (f) if heritage resources will be adversely affected by the proposed development, the consideration of alternatives; and*
- (g) plans for mitigation of any adverse effects during and after the completion of the proposed development."*

3. HERITAGE RESOURCES

3.1 The National Estate

The National Heritage Resources Act (No. 25 of 1999) defines the heritage resources of South Africa which are of cultural significance or other special value for the present community and for future generations that must be considered part of the national estate to include:

- places, buildings, structures and equipment of cultural significance;
- places to which oral traditions are attached or which are associated with living heritage;
- historical settlements and townscapes;

- landscapes and natural features of cultural significance;
- geological sites of scientific or cultural importance;
- archaeological and palaeontological sites;
- graves and burial grounds, including-
 - ancestral graves;
 - royal graves and graves of traditional leaders;
 - graves of victims of conflict;
 - graves of individuals designated by the Minister by notice in the Gazette;
 - historical graves and cemeteries; and
 - other human remains which are not covered in terms of the Human Tissue Act, 1983 (Act No. 65 of 1983);
- sites of significance relating to the history of slavery in South Africa;
- movable objects, including-
 - objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens;
 - objects to which oral traditions are attached or which are associated with living heritage;
 - ethnographic art and objects;
 - military objects;
 - objects of decorative or fine art;
 - objects of scientific or technological interest; and
 - books, records, documents, photographic positives and negatives, graphic, film or video material 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).

3.2 Cultural significance

In the NHRA, Section 2 (vi), it is stated that “cultural significance” means aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance. This is determined in relation to a site or feature’s uniqueness, condition of preservation and research potential.

According to Section 3(3) of the NHRA, a place or object is to be considered part of the national estate if it has cultural significance or other special value because of

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

A matrix (see Section 2 of Addendum) was developed whereby the above criteria were applied for the determination of the significance of each identified site. This allowed some form of control over the application of similar values for similar identified sites.

4. PROJECT DESCRIPTION

4.1 Site location

The proposed development is located on the north-eastern portion of the Remaining Extent of the Farm Bokpoort 390, which is 20 km north-north-west of the town of Groblershoop within the !Kheis Local municipality in the ZF Mgqawu District Municipality, Northern Cape Province (Fig. 1). For more information, see the Technical Summary on p. V above.

The site is within one of South Africa's eight renewable energy development zones and has therefore been identified as one of the most suitable areas in the country for renewable energy development, in terms of a number of environmental impact, economic and infrastructural factors.

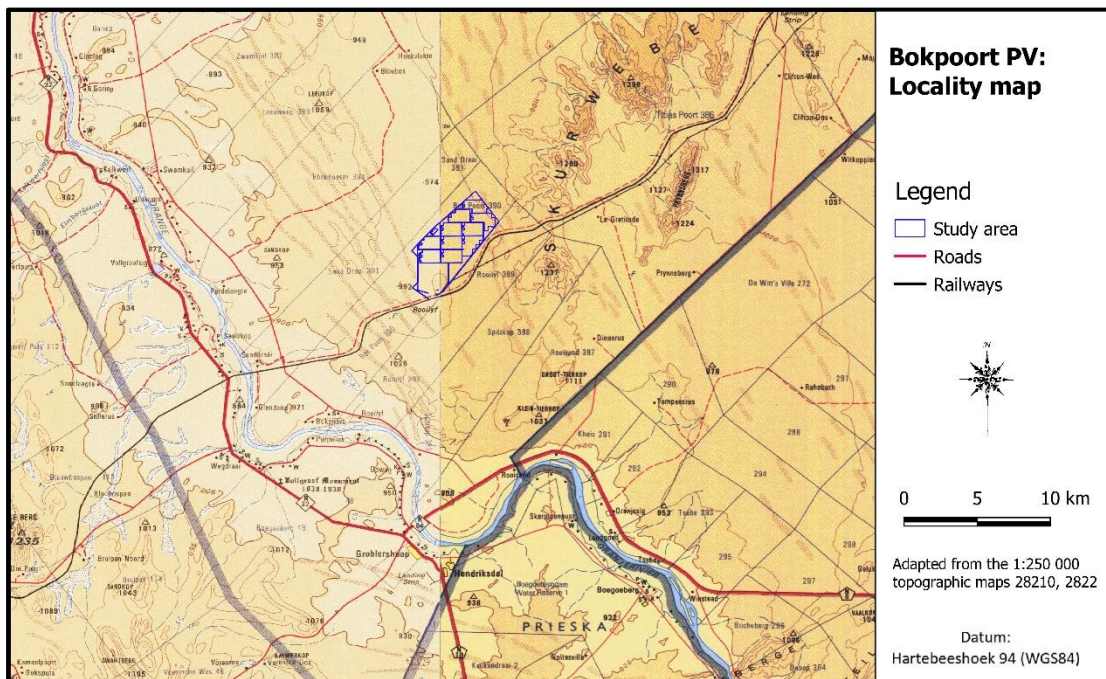


Figure 1. Location of the study area in regional context

4.2 Development proposal

The proposed development is 8 Photovoltaic (PV) Solar Developments of up to 200 Megawatt (MW) each, that will consist of the following infrastructure (Fig. 2):

- Solar PV modules that will be able to deliver up to 200 MW to the Eskom National Grid;
- Inverters that convert direct current (DC) generated by the PV modules into alternating current (AC) to be exported to the electrical grid;
- A transformer that raises the system AC low voltage (LV) to medium voltage (MV). The transformer converts the voltage of the electricity generated by the PV panels to the correct voltage for delivery to Eskom;
- Transformer substation; and
- Instrumentation and Control consisting of hardware and software for remote plant monitoring and operation of the facility.

Associated infrastructure includes:

- Mounting structures for the solar panels;
- Cabling between the structures, to be laid underground where practical;
- A new 132 kV overhead power line which will connect the facility to the national grid via Eskom's existing Garona Substation;
- The powerline will be approximately 5 km in length and will be located within a servitude spanning 15.5m on both sides. The powerline towers will be 35 m high;
- Internal access roads (4 - 6 m wide roads will be constructed but existing roads will be used as far as possible) and fencing.
- Shared infrastructure consisting of buildings, including a workshop area for maintenance, storage (i.e. fuel tanks, etc.), laydown area, parking, warehouse, and offices (previously approved).

Battery energy storage system (applicable to the two authorised PV plants as well):

- Battery Power at Point of Connection: 150MW;
- Area Required: 16ha;
- The BESS will store approximately 4500m³ of hazardous substance.

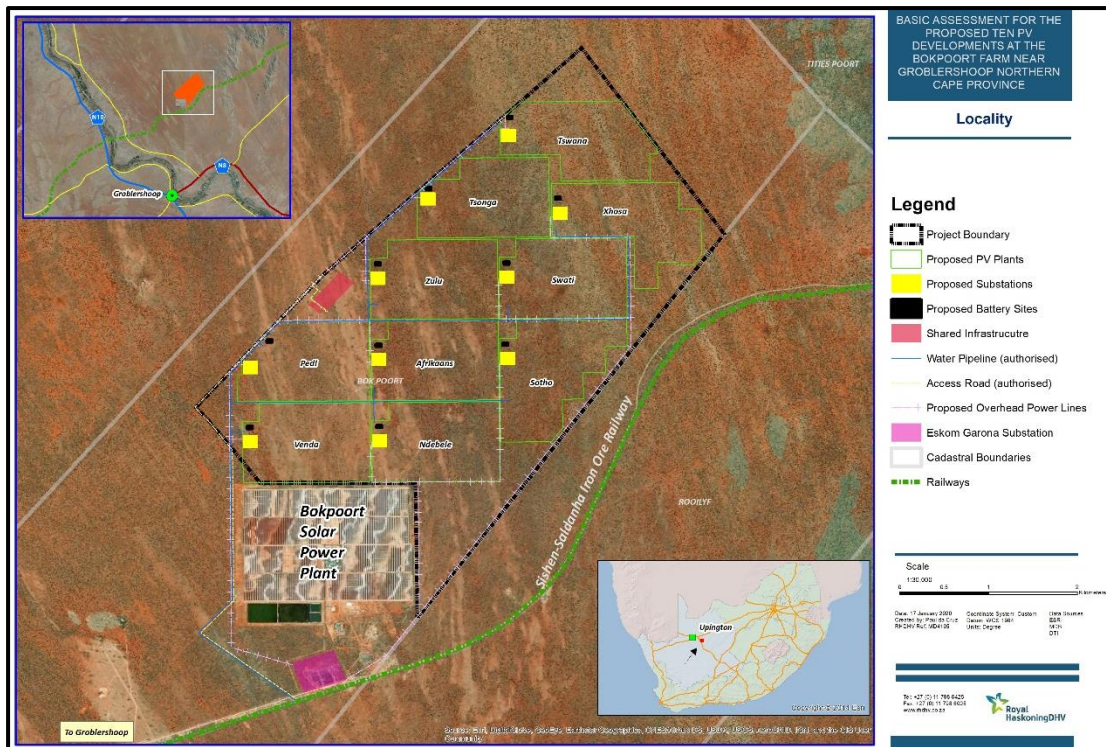


Figure 2. Layout of the project

5. STUDY APPROACH AND METHODOLOGY

5.1 Extent of the Study

This survey and impact assessment cover all facets of cultural heritage located in the study area as presented in Section 4 above and illustrated in Figure 2.

5.2 Methodology

5.2.1 Pre-feasibility assessment

5.2.1.1 Survey of the literature

A survey of the relevant literature was conducted with the aim of reviewing the previous research done and determining the potential of the area. In this regard, various anthropological, archaeological and historical sources were consulted – see list of references in Section 11.

- Information on events, sites and features in the larger region were obtained from these sources.

5.2.1.2 Survey of heritage impact assessments (HIAs)

A survey of HIAs done for projects in the region by various heritage consultants was conducted with the aim of determining the heritage potential of the area – see list of references in Section 11.

- Information on sites and features in the larger region were obtained from these sources.

5.2.1.3 Data bases

The *Heritage Atlas Database*, various SAHRA databases, the *Environmental Potential Atlas*, the *Chief Surveyor General* and the *National Archives of South Africa* were consulted.

- Database surveys produced a number of sites located in the larger region of the proposed development.

5.2.1.4 Other sources

Aerial photographs and topocadastral and other maps were also studied - see the list of references below.

- Information of a very general nature were obtained from these sources

The results of the above investigation are presented in Figure 3 below – see list of references in Section 11 – and can be summarised as follows:

- Stone tools, mostly dating to the Middle Stone Age (MSA), occur sporadically across the larger region and is mostly located on hills, outcrops and along drainage channels;
- Historic structures, inclusive of buildings and bridges, occur in a sporadic manner across the larger landscape as well as in urban centres;
- Formal and informal burial sites occur in a number of places in towns and across the countryside.

*Based on the above assessment, the probability of cultural heritage sites, features and objects occurring in the study area is deemed to be **very low**.*

Table 1: Pre-Feasibility Assessment

Category	Period	Probability	Reference
Natural			
Landscapes		None	
Early hominin	Pliocene – Lower Pleistocene		
	Early hominin	None	
Stone Age	Lower Pleistocene – Holocene		
	Early Stone Age	None	
	Middle Stone Age	Low	Dreyer (2014, 2015); Morris (2012, 2014); van der Walt (2015a, 2015b); van Ryneveld (2007); van Schalkwyk (2011, 2019)
	Later Stone Age	Low	

	Rock Art	None	
Iron age	Holocene		
	Early Iron Age	None	
	Middle Iron Age	None	
	Late Iron Age	None	
Colonial period	Holocene		
	Contact period/Early historic	Possible	Dreyer (2014)
	Recent history	Possible	Van der Walt (2015a); van Schalkwyk (2019)
	Industrial heritage	None	

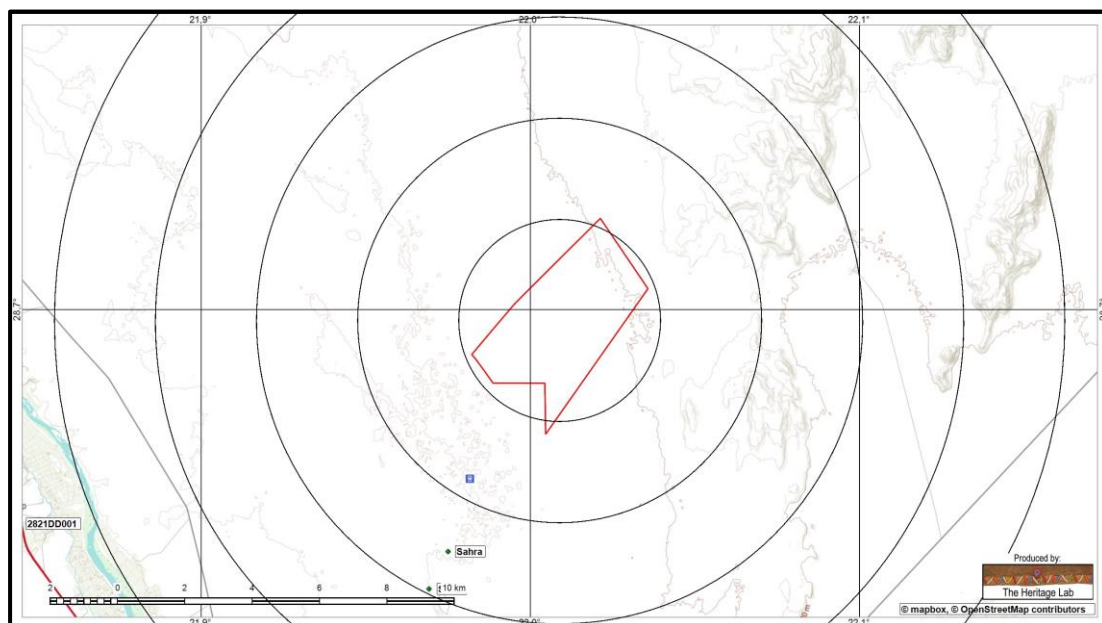


Figure 3. Location of known heritage sites and features in relation to the study area (Circles spaced at a distance of 2km: heritage sites = coded green dots)

5.2.2 Field survey

The field survey was done according to generally accepted archaeological practices, and was aimed at locating all possible sites, objects and structures. The area that had to be investigated was identified by the *Royal HaskoningDHV (Pty) Ltd* by means of maps and .kml files indicating the development area. This was loaded onto an ASUS digital device and used in Google Earth during the field survey to access the areas.

The site was visited on 4 December 2019 and was investigated by using internal tracks to access the sites and then walking a number of transects across it – see Fig. 4 below. During the site visit, archaeological visibility was good due to the prolonged period of drought in the region which prevented the vegetation cover from re-growing (see Fig. 5 below).

- As the total area was previously surveyed by Dreyer (2015), the purpose of this survey was just to confirm his findings. Therefore, only a cursory survey was done, stopping at places that seemed promising, especially to confirm the presence of stone tools.

5.2.3 Documentation

All sites, objects and structures that are identified are documented according to the general minimum standards accepted by the archaeological profession. Coordinates of individual localities are determined by means of the *Global Positioning System (GPS)* and plotted on a map. This information is

added to the description in order to facilitate the identification of each locality. Map datum used: Hartebeeshoek 94 (WGS84).

The track log and identified sites were recorded by means of a Garmin Oregon 550 handheld GPS device. Photographic recording was done by means of a Canon EOS 550D digital camera.

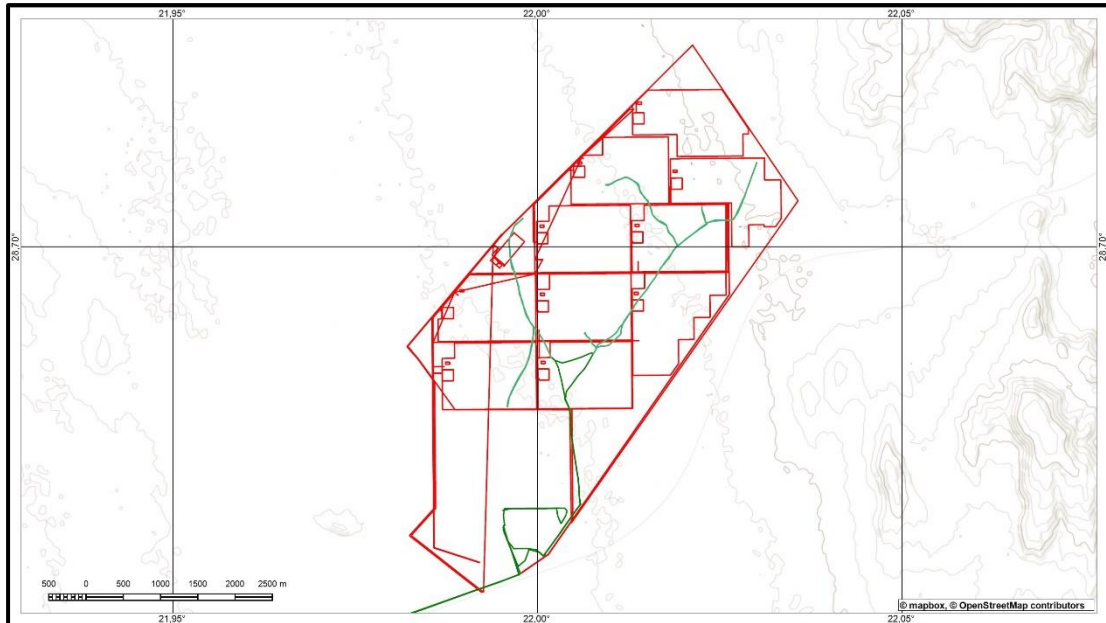


Figure 4. Map indicating the track log of the field survey.

6. DESCRIPTION OF THE AFFECTED ENVIRONMENT

6.1 Natural Environment

The geology of the study area is made up of superficial deposits comprising gravels, clays, sandstone, silcrete, calcrete and aeolian sand. The topography is described as plains and no rivers, outcrops or hills occur in the study area or its immediate vicinity (Fig. 5).

The original vegetation in the study area is classified as Kalahari Karroid Shrubland, part of the Nama-Karoo Biome, which is part of the Bushmanland Bioregion (Muncina & Rutherford 2006) (Fig. 6).

According to Dreyer (2015) the site is characterised by a repeated pattern of alternating red sand dunes, calcrete scatters and quartzite outcrops. The nature of the site varied from Aeolian (Kalahari) dune veld, visible spreads of calcrete and scatters of quartzite sills.

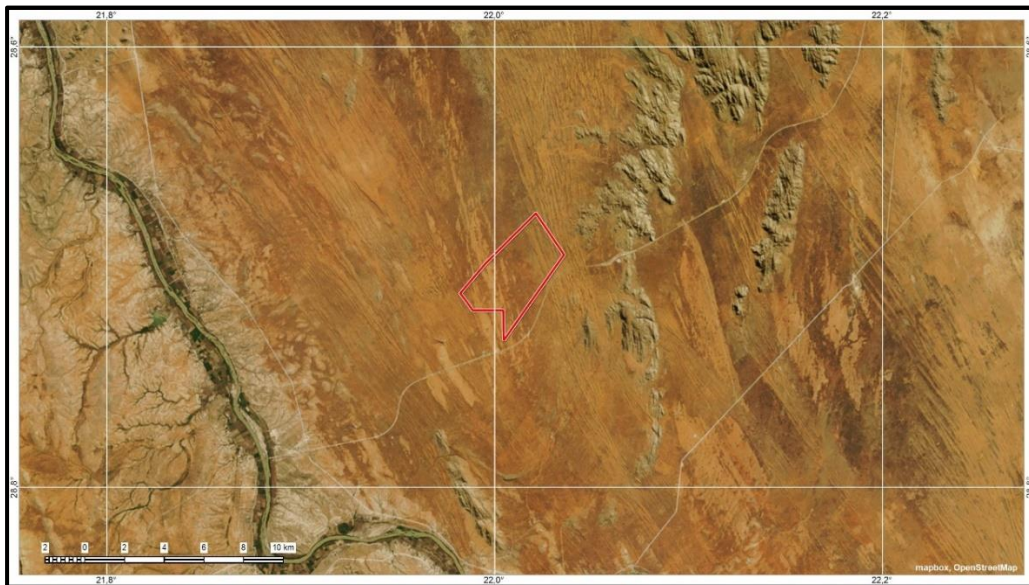


Figure 5. The topography of the larger region

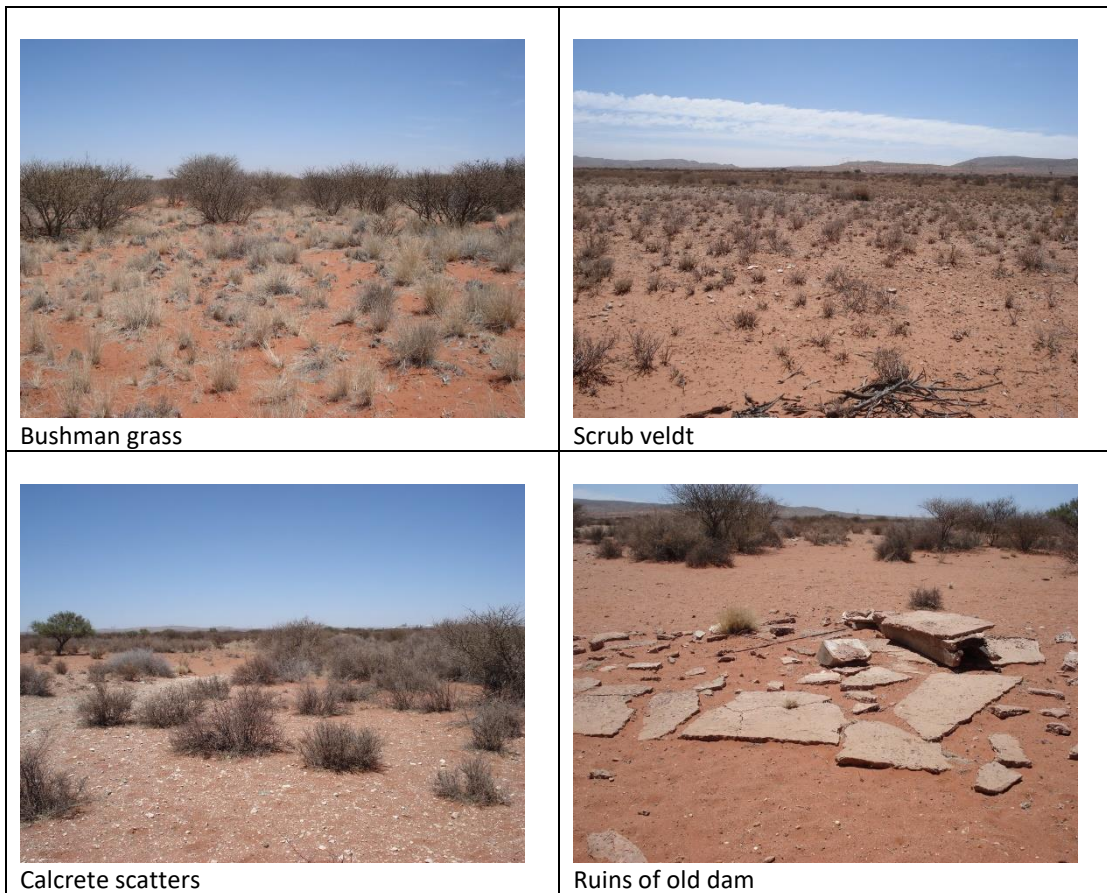


Figure 6. Views over the study area

The Palaeontological Sensitivity Map (SAHRIS) indicate that the study area (Fig. 7) has a moderate sensitivity of fossil remains to be found and therefore a desktop palaeontological study is required.

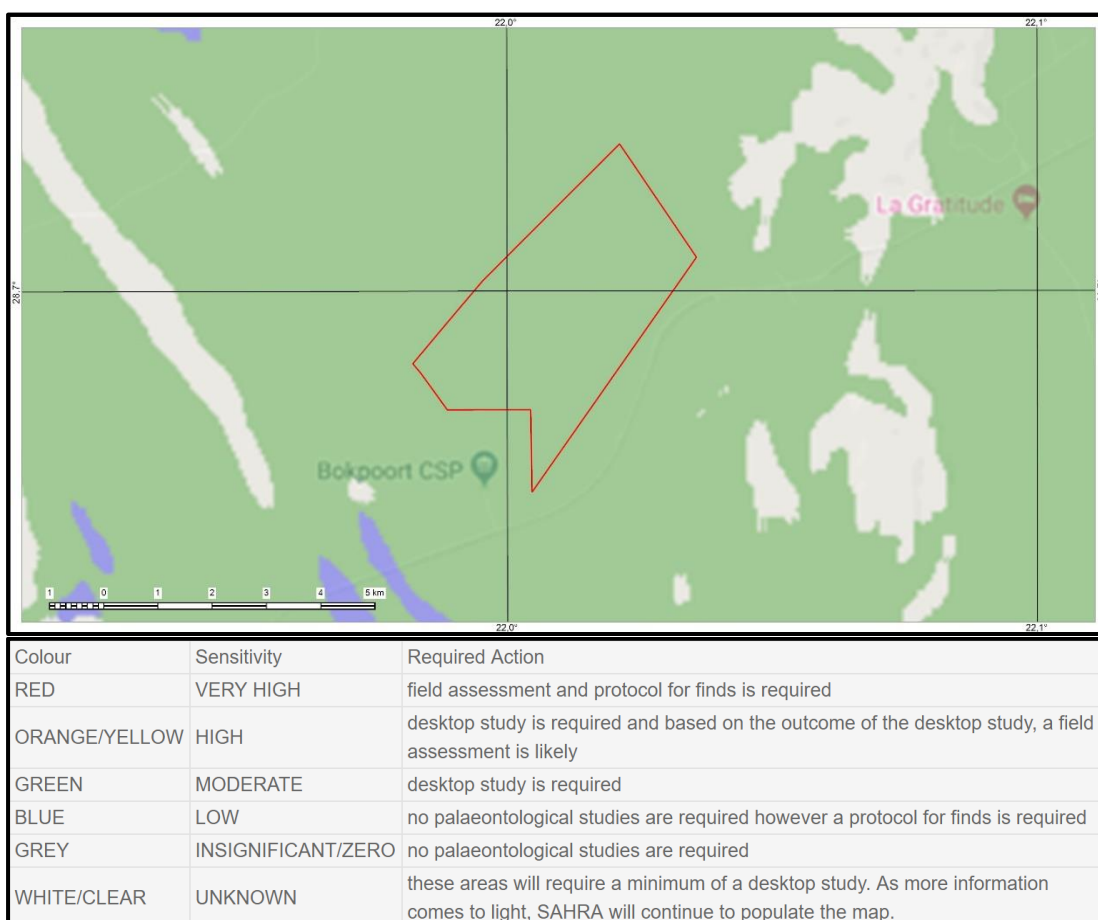


Figure 7. The Palaeontological sensitivity of the study areas

6.2 Cultural Landscape

The aim of this section is to present an overview of the history of the larger region in order to eventually determine the significance of heritage sites identified in the study area, within the context of their historic, aesthetic, scientific and social value, rarity and representativity.

The cultural landscape qualities of the region are made up of a pre-colonial element consisting of Stone Age and a much later colonial (farmer) component, which eventually gave rise to an urban component which manifest in a number of small towns and an intensive farming industry.

6.2.1 Stone Age

Surveys in the area has revealed that the archaeological record in the larger region is temporarily confined to the Early and Middle Stone Age, with a smaller occurrence dating to the Later Stone Age. It is spatially concentrated around the rims of pans, the banks of stream and rivers (Morris 2005), but also in the vicinity of raw material resources.

Recently Parsons (2007, 2008) demonstrated that the so-called Swartkop and Doornfontein industries possibly relate to different socio-economies – those of hunter-gatherers and stock keepers. Based on an analysis of material recovered from five sites in the Northern Cape Province, all dating to the last two millennia, she compares variability between assemblages attributed to the Swartkop and Doornfontein industries and identify areas of overlap and difference.

6.2.2 Iron Age

Early Iron Age occupation did not take place in the region and seems as if the earliest Bantu-language speakers to have settled in the larger region were those of Tswana-speaking origin (Tlhaping and Tlharo) that settled mostly to the north and a bit to the west of Kuruman. However, they continued spreading westward and by the late 18th century some groups occupied the Langeberg region. With the annexation of the Tswana areas by the British in 1885, the area became known as British Betschuana Land. A number of reserves were set up for these people to stay in. In 1895 the Tswana-speakers rose up in resistance to the British authority as represented by the government of the Cape Colony. They were quickly subjected, and their land was taken away, divided up into farms and given out to white farmers to settle on (Snyman 1986).

In his study on the spread of the Iron Age into the Northern Cape, Humphreys (1976) used not only archaeological evidence, literary sources and eyewitness accounts, but also environmental factors such as rainfall data and vegetation cover. From this he concluded that it was not an environment conducive for keeping large herds of cattle, which was the mainstay of Iron Age communities' economy. He even indicates that the occupation of these people contracted from 1700 south of Postmasburg to just south of Kuruman by 1800, indicating a huge change in environmental factors.

Although some researchers would want to identify isolated, undecorated pieces of pottery found in the vicinity of Douglas as of Late Iron Age origin, this is doubtful as they also do not consider the possibility of it being of Khoi origin. Or, alternatively, of very recent origin, i.e. brought into the region by people working as labourers on the various diamond diggings in the larger region.

6.2.3 Historic period

It was only during the last part of the 19th century, early part of the 20th century when population numbers in the region increased. This was the result of intensive irrigation farming that developed along the Orange River.

The town of Upington, originally known as Olijvenhoutsdrift, was founded in 1871 as part of a mission station by the German missionary Rev Schröder. The town was renamed in 1884 after Sir Thomas Upington, who was the Prime Minister of the Cape Colony and who visited the town in 1884.

An irrigation canal was started by Rev Schröder in 1883. It was completed in 1885. By 1884 there were already 77 irrigation farms. Nowadays, it is disputed that Schröder was the original builder of the canal, and it is claimed that he only carried on with an idea that was started by a local inhabitant by the name of Abraham September.

Grobler'shoop developed as a result of development of the Boegoeberg Dam and water channels in 1929, which gave rise to grapes and wine production. During the Rebellion of 1914, a number of skirmishes were fought in the region.

6.3 Site specific review

Although landscapes with cultural significance are not explicitly described in the NHRA, they are protected under the broad definition of the National Estate (Section 3): Section 3(2)(c) and (d) list "historical settlements and townscape" and "landscapes and natural features of cultural significance" as part of the National Estate.

The examination of historical maps and aerial photographs help us to reconstruct how the cultural landscape has changed over time as it shows how humans have used the land.

As this used to be a very isolated region, little information exists about it. It was only recently when a number of development projects were initiated in the region, that the heritage potential of the region was investigated. Most of these studies focussed on the Stone Age presence in the region, which, by all accounts seems to be very limited (Dreyer 2014, 2015; Morris 2014, 2018; van der Walt 2015; van Schalkwyk 2019) as it presents a very low profile in the landscape.

From the Deed of Transfer no. 1294 (Fig. 8), it can be seen that the farm was first surveyed in December 1892 and then granted to F.W.C Loxton on 14 November 1894.

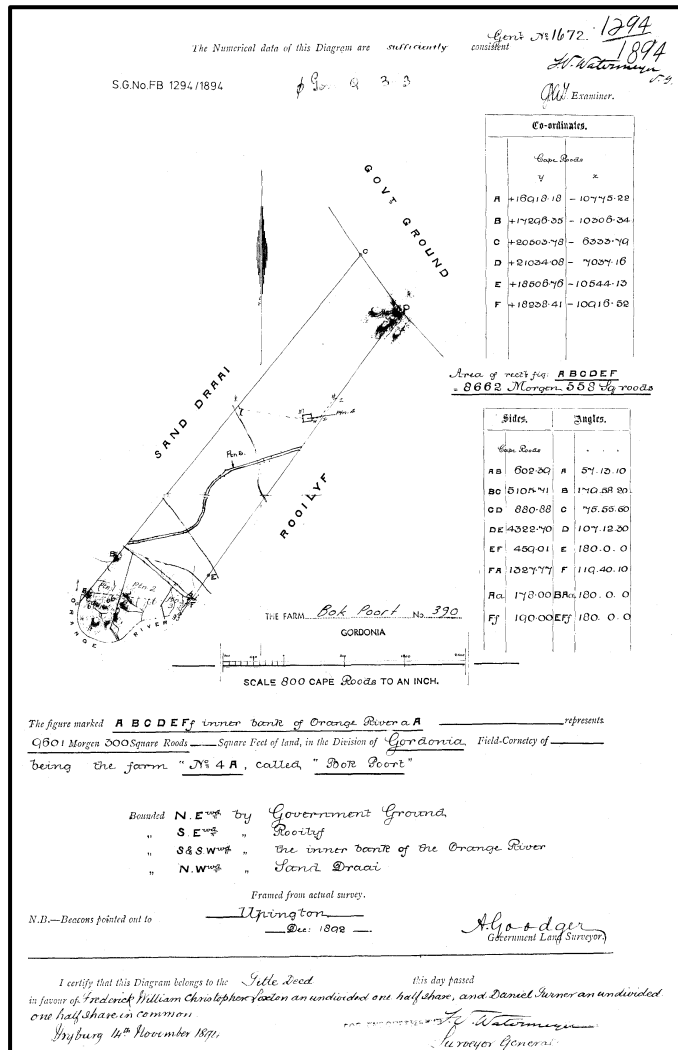


Figure 8. Copy of the original Deed of Transfer for the farm Bokpoort (Chief Surveyor-General: 10026W01)

One of the older maps of the region (Fig. 9), dating to 1914, shows an area with little development in the interior where the isolated sheep post of vehicle tracks is indicated. Closer to the river and number of presumably farm names are indicated in the vicinity of the Orange River.

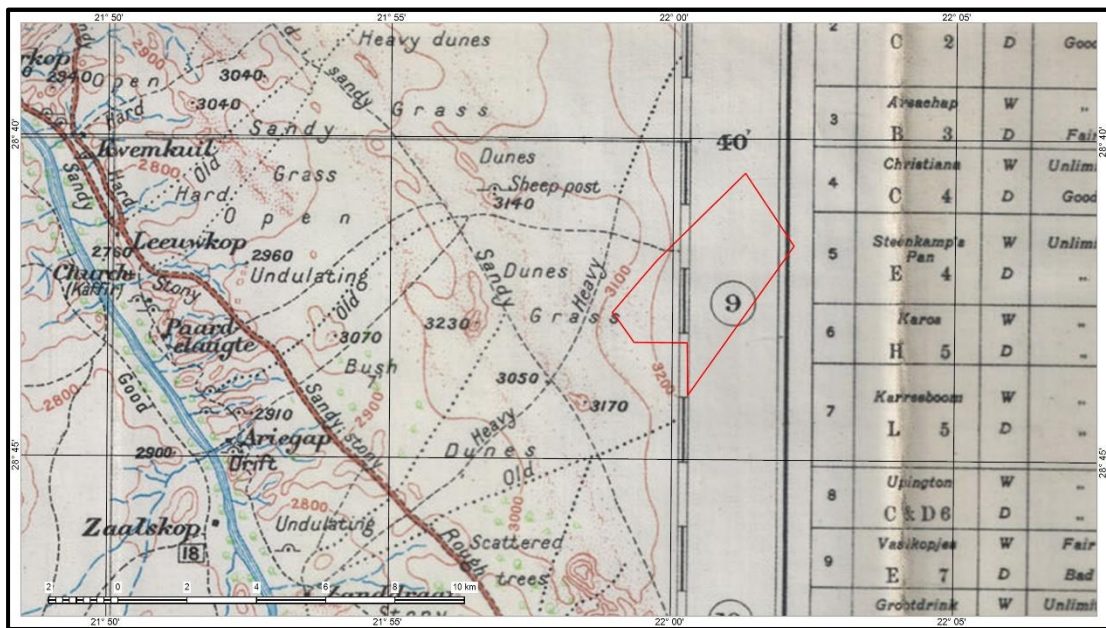


Figure 9. The study areas on the 1914 version of the 1:250 000 topographic map 'Uppington'

The official aerial photograph dating to 1964 (Fig. 10) still shows, apart from fence boundaries, a landscape empty of any development. It was only by the middle of the 1970s when the Sishen-Saldanha railway line was opened (1976) and the associated powerlines were constructed, that any development can be seen. This presented on the 1981 version of the 1:50 000 topographic map (11).

However, this lack of development, i.e. built environment, seems to continue as can be seen on the various Google Image aerial photographs (Fig. 12) and it is only with the recent development of the Bokpoort Concentrated Solar Thermal that some built features were added to the region.



Figure 10. The study area on the 1964 version of the official aerial photograph
(Photograph: 524_003_00863)

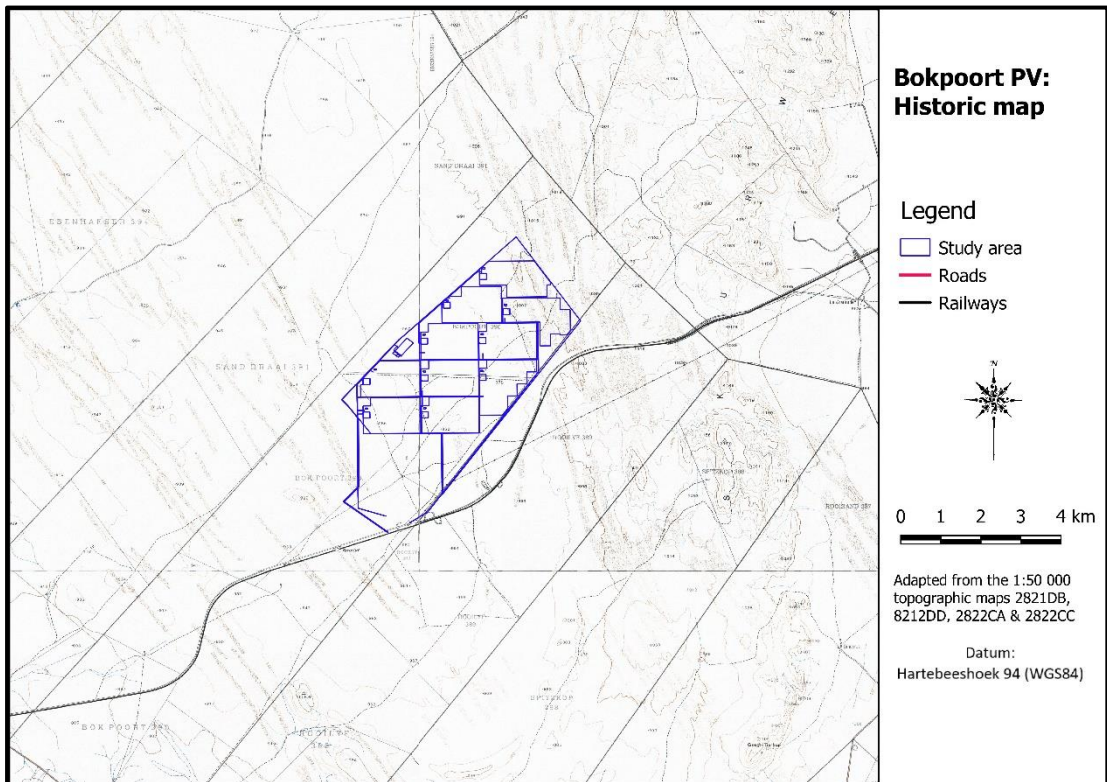


Figure 11. The study area on the 1982 version of the 1:50 000 topographic maps

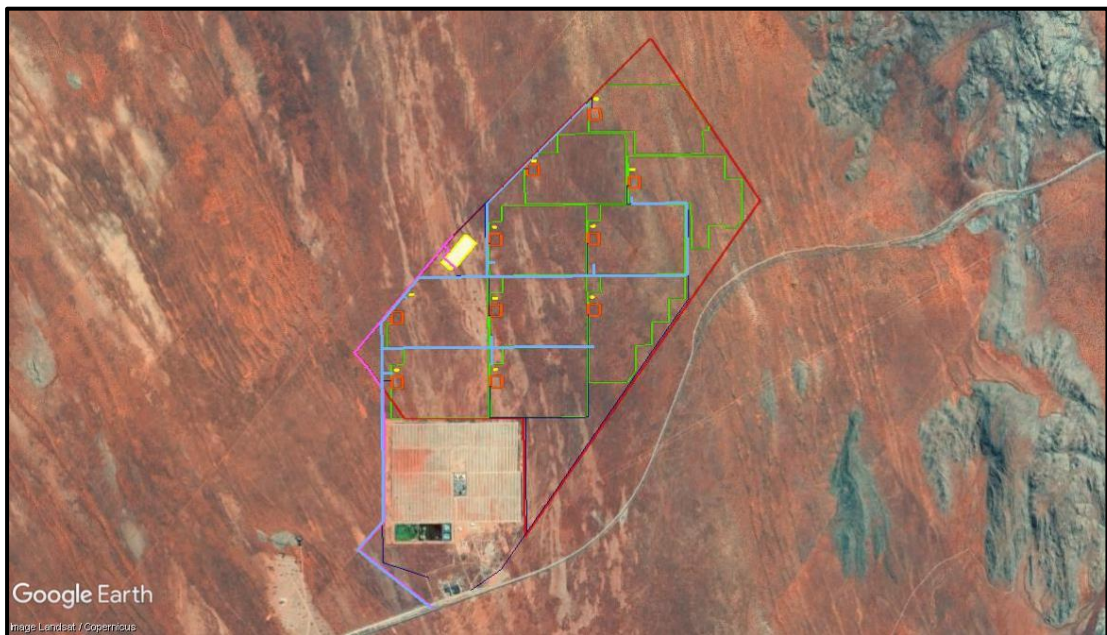


Figure 12. The study area on the 2019 aerial photograph (Image: Google Earth)

7. SURVEY RESULTS

During the physical survey, the following sites, features and objects of cultural significance were identified in the study area (Fig. 13).

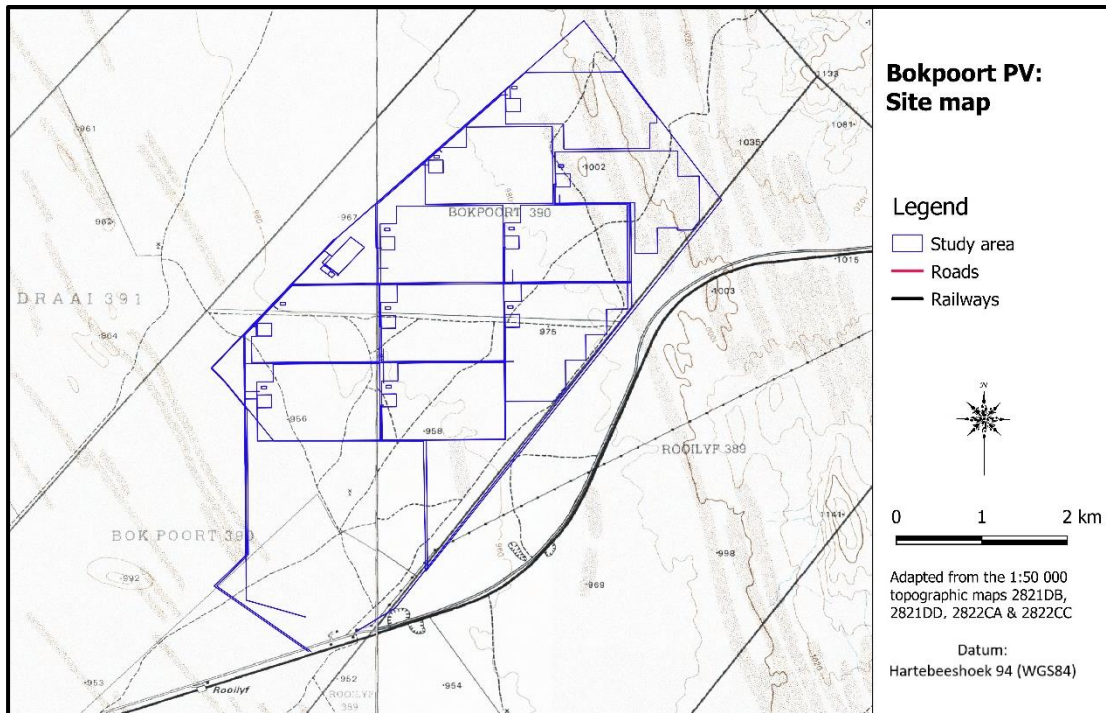


Figure 13. Location of heritage sites in the study area
(Please note that as nothing was found, nothing is indicated on the map)

7.1 Stone Age

Stone Age lithics dating to the MSA are found only as low-density surface scatters, which is confirmed by similar findings in the larger region by other researchers (Dreyer 2014, 2015; Morris 2014, 2018; van der Walt 2015; van Schalkwyk 2019). They are commonly found on the pebble plains where source material is readily available. The density of artefacts is less than 1/50m². The tools are mostly made from banded iron stone (jaspelite), although some quartzite and hardened shale flakes were also noted. Cores, flakes and tools are found. The tools are very rough and informal and only a few that can be described as typical, i.e. blades and scrapers, were identified.

- The low density of the lithic scatters is, on archaeological grounds, viewed to be of low significance and require no further action.

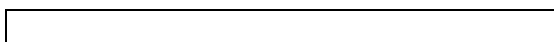




Figure 14. Some of the identified tools and flakes

7.2 Iron Age

- No sites, features or objects of cultural significance dating to the Iron Age were identified in the study area.

7.3 Historic period

- Apart from current farming related features such as water troughs, no sites, features or objects of cultural significance dating to the historic period were identified in the study area.

8. IMPACT ASSESSMENT RATINGS AND MITIGATION MEASURES

8.1 Impact assessment

Heritage impacts are categorised as:

- Direct or physical impacts, implying alteration or destruction of heritage features within the project boundaries;
- Indirect impacts, e.g. restriction of access or visual intrusion concerning the broader environment;
- Cumulative impacts that are combinations of the above.

Impact analysis of cultural heritage resources under threat of the proposed development, is based on the present understanding of the development and is summarised in Table 1 below:

Table 2: Calculation of the impact on the identified heritage features

Heritage sites	Significance of impact	Mitigation measures
Bokpoort II Solar Power Plant: Construction Phase		
Without mitigation	n/a	n/a
With mitigation	n/a	n/a
Bokpoort II Solar Power Plant: Operation Phase		
Without mitigation	n/a	n/a
With mitigation	n/a	n/a

8.2 Mitigation measures

Mitigation: means to anticipate and prevent negative impacts and risks, then to minimise them, rehabilitate or repair impacts to the extent feasible.

- For the current study, as no sites, features or objects of cultural significance were identified, no mitigation measures are proposed.

8.3 Cumulative assessment

The cumulative impact of the proposed Bokpoort project is assessed by adding impacts from this proposed development to existing and other proposed developments with similar impacts within a 60 km radius. The existing and proposed developments that were taken into consideration for cumulative impacts include a total of six other plants and are listed in Table 3. From the map 'South African Generation Projects' (Fig. 13) below, it can be seen that the Bokpoort project is located in an area where little such development has taken place, with the implication that the cumulative impact would be very low.

Table 3: Existing and planned alternative energy generation facilities in the larger region

Name	Nearest town	Technology	Capacity	Status
Bokpoort	Groblershoop	Concentrated Solar Thermal	50MW	Fully operational
Eskom	Upington	Concentrated Solar Thermal	100MW	Awaiting construction
Grootdrink	Upington	Solar PV	?	Proposed
Karoshhoek	Upington	Concentrated Solar Thermal	100MW	Awaiting construction
Tewa Isitha	Upington	Solar PV	?	Proposed
Upington	Upington	Solar PV	8.9MW	Fully operational

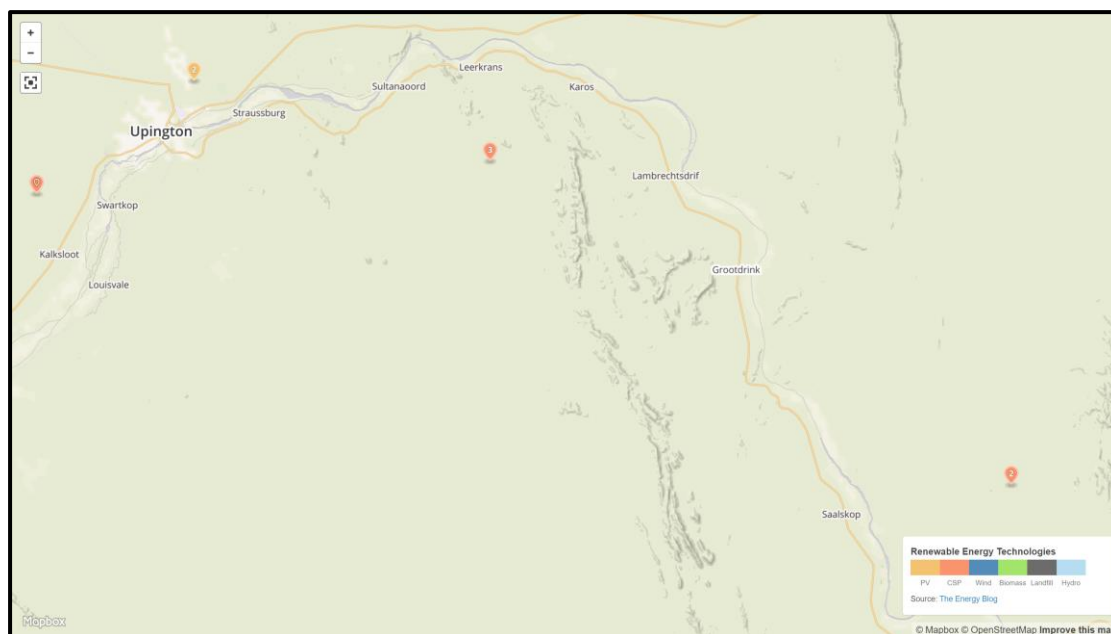


Figure 15. Map indicating the location of alternative energy generation facilities in the larger region (<https://www.energy.org.za/map-south-african-generation-projects> - accessed 27/01/2020)

The cultural heritage profile of the larger region is very limited. Most frequently found are stone artefacts, mostly dating to the Middle Stone Age. Sites containing such material are usually located along the margins of water features (pans, drainage lines), small hills and rocky outcrops. Such surface scatters or 'background scatter' is usually viewed to be of limited significance (Orton 2016). In addition to the Stone Age profile, there is also the colonial element. This manifests largely as individual farmsteads, in all its complexity, burial sites and infrastructure features such as roads, railways and power lines, which occurs only in limited numbers. This again has the implication that the cumulative impact would be very low.

Table 4: Cumulative impact assessment summary

Nature: Loss of or damage to sites, features or objects of cultural significance on the development site			
		Without mitigation	With mitigation
Extent		Local area (1)	Local area (1)
Duration		Permanent (5)	Permanent (5)
Intensity		Minor (2)	Minor (2)
Probability		Improbable (2)	Improbable (2)
Significance		Low (16)	Low (16)
Status (positive or negative)		Negative	Neutral
Reversibility		Non-reversible	Non-reversible
Irreplaceable loss of resources?		High	Low
Can impacts be mitigated		Yes	
Mitigation: Avoidance of site/excavation if required			
Cumulative impact: Limited loss of similar features in the larger landscape.			
Site type	NHRA category	Field rating	Impact rating: Before/After mitigation
Archaeological sites/material	Section 35	Generally protected: Low significance – Grade IV-C	Low (16) Low (16)
Burial sites and graves	Section 36	Generally protected: Medium significance – Grade IV-A	Low (16) Low (16)
Built environment	Section 34	Generally protected: Low significance – Grade IV-C	Low (16) Low (16)

9. MANAGEMENT MEASURES

Heritage sites are fixed features in the environment, occurring within specific spatial confines. Any impact upon them is permanent and non-reversible. Those resources that cannot be avoided and that are directly impacted by the proposed development can be excavated/recorded and a management plan can be developed for future action. Those sites that are not impacted on can be written into the management plan, whence they can be avoided or cared for in the future.

Sources of risk were considered with regards to development activities defined in Section 2(viii) of the NHRA that may be triggered and are summarised in Table 3A and 3B below. These issues formed the basis of the impact assessment described. The potential risks are discussed according to the various phases of the project below.

9.1 Objectives

- Protection of archaeological, historical and any other site or land considered being of cultural value within the project boundary against vandalism, destruction and theft.
- The preservation and appropriate management of new discoveries in accordance with the NHRA, should these be discovered during construction activities.

The following shall apply:

- Known sites should be clearly marked in order that they can be avoided during construction activities.
- The contractors and workers should be notified that archaeological sites might be exposed during the construction activities.
- Should any heritage artefacts be exposed during excavation, work on the area where the artefacts were discovered, shall cease immediately and the Environmental Control Officer shall be notified as soon as possible;
- All discoveries shall be reported immediately to a heritage practitioner so that an investigation and evaluation of the finds can be made. Acting upon advice from these specialists, the Environmental Control Officer will advise the necessary actions to be taken;

- Under no circumstances shall any artefacts be removed, destroyed or interfered with by anyone on the site; and
- Contractors and workers shall be advised of the penalties associated with the unlawful removal of cultural, historical, archaeological or palaeontological artefacts, as set out in the National Heritage Resources Act (Act No. 25 of 1999), Section 51. (1).

9.2 Control

In order to achieve this, the following should be in place:

- A person or entity, e.g. the Environmental Control Officer, should be tasked to take responsibility for the heritage sites and should be held accountable for any damage.
- Known sites should be located and isolated, e.g. by fencing them off. All construction workers should be informed that these are no-go areas, unless accompanied by the individual or persons representing the Environmental Control Officer as identified above.
- In areas where the vegetation is threatening the heritage sites, e.g. growing trees pushing walls over, it should be removed, but only after permission for the methods proposed has been granted by SAHRA. A heritage official should be part of the team executing these measures.

Table 5A: Construction Phase: Environmental Management Programme for the project

Action required	Protection of heritage sites, features and objects		
Potential Impact	The identified risk is damage or changes to resources that are generally protected in terms of Sections 27, 28, 31, 32, 34, 35, 36 and 37 of the NHRA that may occur in the proposed project area.		
Risk if impact is not mitigated	Loss or damage to sites, features or objects of cultural heritage significance		
Activity / issue	Mitigation: Action/control	Responsibility	Timeframe
1. Removal of Vegetation 2. Construction of required infrastructure, e.g. access roads, water pipelines	See discussion in Section 9.1 above	Environmental Control Officer	During construction only
Monitoring	See discussion in Section 9.2 above		

Table 5B: Operation Phase: Environmental Management Programme for the project

Action required	Protection of heritage sites, features and objects		
Potential Impact	It is unlikely that the negative impacts identified for pre-mitigation will occur if the recommendations are followed.		
Risk if impact is not mitigated	Loss or damage to sites, features or objects of cultural heritage significance		
Activity / issue	Mitigation: Action/control	Responsibility	Timeframe
1. Removal of Vegetation 2. Construction of required infrastructure, e.g. access roads, water pipelines	See discussion in Section 9.1 above	Environmental Control Officer	During construction only
Monitoring	See discussion in Section 9.2 above		

10. CONCLUSIONS AND RECOMMENDATIONS

This report describes the methodology used, the limitations encountered, the heritage features that were identified and the recommendations and mitigation measures proposed relevant to this. It should be noted that the implementation of the mitigation measures is subject to SAHRA/PHRA's comments.

The cultural landscape qualities of the region are made up of a pre-colonial element consisting of Stone Age and a much later colonial (farmer) component, which eventually gave rise to an urban component which manifest in a number of small towns and an intensive farming industry.

Identified sites

Stone Age lithics dating to the MSA are found only as low-density surface scatters, which is confirmed by similar findings in the larger region by other researchers (Dreyer 2014, 2015; Morris 2014, 2018; van der Walt 2015; van Schalkwyk 2019). The density of artefacts is less than 1/50m².

- The low density of the lithic scatters is, on archaeological grounds, viewed to be of low significance and require no further action.

Impact assessment and proposed mitigation measures

Impact analysis of cultural heritage resources under threat of the proposed development, is based on the present understanding of the development:

- As no sites, features or objects of cultural significance are known to exist in the development area, there would be no impact as a result of the proposed development.

Heritage sites	Significance of impact	Mitigation measures
Bokpoort II Solar Power Plant: Construction Phase		
Without mitigation	n/a	n/a
With mitigation	n/a	n/a
Bokpoort II Solar Power Plant: Operation Phase		
Without mitigation	n/a	n/a
With mitigation	n/a	n/a

Cumulative impact assessment

The cultural heritage profile of the larger region is very limited and consists of isolated findspots of Stone Age (MSA) tools, farmsteads and burial sites. Consequently, the cumulative impact of the proposed development is viewed to be **low**

Site type	NHRA category	Field rating	Impact rating: Before/After mitigation
Archaeological sites/material	Section 35	Generally protected: Low significance – Grade IV-C	Low (16) Low (16)
Burial sites and graves	Section 36	Generally protected: Low significance – Grade IV-A	Low (16) Low (16)

Legal requirements

The legal requirements related to heritage specifically are specified in Section 3 of this report. For this proposed project, the assessment has determined that no sites, features or objects of heritage significance occur in the study area. If heritage features are identified during construction, as stated in the management recommendation, these finds would have to be assessed by a specialist, after which a decision will be made regarding the application for relevant permits.

Reasoned opinion as to whether the proposed activity should be authorised:

- From a heritage point of view, it is recommended that the proposed development be allowed to continue on acceptance of the proposed mitigation measures and the conditions proposed below.

Conditions for inclusion in the environmental authorisation:

- The Palaeontological Sensitivity Map (SAHRIS) indicate that the study area has a moderate sensitivity of fossil remains to be found and therefore a desktop palaeontological required.
- Should archaeological sites or graves be exposed in other areas during construction work, it must immediately be reported to a heritage practitioner so that an investigation and evaluation of the finds can be made.

11. REFERENCES

11.1 Data bases

Chief Surveyor General
Environmental Potential Atlas, Department of Environmental Affairs and Tourism.
Heritage Atlas Database, Pretoria
National Archives of South Africa
SAHRA Archaeology and Palaeontology Report Mapping Project (2009)
SAHRIS Database

11.2 Literature

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11.3 Archival sources, maps and aerial photographs

- 1: 50 000 Topographic maps
- Google Earth
- Aerial Photographs: Chief Surveyor-General

12. ADDENDUM

1. Indemnity and terms of use of this report

The findings, results, conclusions and recommendations given in this report are based on the author's best scientific and professional knowledge as well as available information. The report is based on survey and assessment techniques which are limited by time and budgetary constraints relevant to the type and level of investigation undertaken and the author reserve the right to modify aspects of the report including the recommendations if and when new information may become available from ongoing research or further work in this field, or pertaining to this investigation.

Although all possible care is taken to identify all sites of cultural importance during the investigation of study areas, it is always possible that hidden or sub-surface sites could be overlooked during the study. The author of this report will not be held liable for such oversights or for costs incurred as a result of such oversights.

Although the author exercises due care and diligence in rendering services and preparing documents, he accepts no liability and the client, by receiving this document, indemnifies the author against all actions, claims, demands, losses, liabilities, costs, damages and expenses arising from or in connection with services rendered, directly or indirectly by the author and by the use of the information contained in this document.

This report must not be altered or added to without the prior written consent of the author. This also refers to electronic copies of this report which are supplied for the purposes of inclusion as part of other reports, including main reports. Similarly, any recommendations, statements or conclusions drawn from or based on this report must make reference to this report. If these form part of a main report relating to this investigation or report, this report must be included in its entirety as an appendix or separate section to the main report.

2. Assessing the significance of heritage resources and potential impacts

A system for site grading was established by the NHRA and further developed by the South African Heritage Resources Agency (SAHRA 2007) and has been approved by ASAPA for use in southern Africa and was utilised during this assessment.

2.1 Significance of the identified heritage resources

According to the NHRA, Section 2(vi) the **significance** of a heritage sites and artefacts is determined by it aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technical value in relation to the uniqueness, condition of preservation and research potential. It must be kept in mind that the various aspects are not mutually exclusive, and that the evaluation of any site is done with reference to any number of these.

Matrix used for assessing the significance of each identified site/feature

1. SITE EVALUATION				
1.1 Historic value				
Is it important in the community, or pattern of history				
Does it have strong or special association with the life or work of a person, group or organisation of importance in history				
Does it have significance relating to the history of slavery				
1.2 Aesthetic value				
It is important in exhibiting particular aesthetic characteristics valued by a community or cultural group				
1.3 Scientific value				
Does it have potential to yield information that will contribute to an understanding of natural or cultural heritage				
Is it important in demonstrating a high degree of creative or technical achievement at a particular period				
1.4 Social value				
Does it have strong or special association with a particular community or cultural group for social, cultural or spiritual reasons				
1.5 Rarity				
Does it possess uncommon, rare or endangered aspects of natural or cultural heritage				
1.6 Representivity				
Is it important in demonstrating the principal characteristics of a particular class of natural or cultural places or objects				
Importance in demonstrating the principal characteristics of a range of landscapes or environments, the attributes of which identify it as being characteristic of its class				
Importance in demonstrating the principal characteristics of human activities (including way of life, philosophy, custom, process, land-use, function, design or technique) in the environment of the nation, province, region or locality.				
2. Sphere of Significance		High	Medium	Low
International				
National				
Provincial				
Regional				
Local				
Specific community				
3. Field Register Rating				
1.	National/Grade 1: High significance - No alteration whatsoever without permit from SAHRA			
2.	Provincial/Grade 2: High significance - No alteration whatsoever without permit from provincial heritage authority.			
3.	Local/Grade 3A: High significance - Mitigation as part of development process not advised.			

4.	Local/Grade 3B: High significance - Could be mitigated and (part) retained as heritage register site	
5.	Generally protected 4A: High/medium significance - Should be mitigated before destruction	
6.	Generally protected 4B: Medium significance - Should be recorded before destruction	
7.	Generally protected 4C: Low significance - Requires no further recording before destruction	

2.2 Significance of the anticipated impact on heritage resources

All impacts identified during the HIA stage of the study will be classified in terms of their significance. Issues would be assessed in terms of the following criteria:

Nature of the impact

A description of what causes the effect, what will be affected and how it will be affected.

Extent

The physical **extent**, wherein it is indicated whether:

- 1 - The impact will be limited to the site;
- 2 - The impact will be limited to the local area;
- 3 - The impact will be limited to the region;
- 4 - The impact will be national; or
- 5 - The impact will be international.

Duration

Here it should be indicated whether the lifespan of the impact will be:

- 1 - Of a very short duration (0–1 years);
- 2 - Of a short duration (2-5 years);
- 3 - Medium-term (5–15 years);
- 4 - Long term (where the impact will persist possibly beyond the operational life of the activity); or
- 5 - Permanent (where the impact will persist indefinitely).

Magnitude (Intensity)

The magnitude of impact, quantified on a scale from 0-10, where a score is assigned:

- 0 - Small and will have no effect;
- 2 - Minor and will not result in an impact;
- 4 - Low and will cause a slight impact;
- 6 - Moderate and will result in processes continuing but in a modified way;
- 8 - High, (processes are altered to the extent that they temporarily cease); or
- 10 - Very high and results in complete destruction of patterns and permanent cessation of processes.

Probability

This describes the likelihood of the impact actually occurring and is estimated on a scale where:

- 1 - Very improbable (probably will not happen);
- 2 - Improbable (some possibility, but low likelihood);
- 3 - Probable (distinct possibility);
- 4 - Highly probable (most likely); or
- 5 - Definite (impact will occur regardless of any prevention measures).

Significance

The significance is determined through a synthesis of the characteristics described above (refer to the formula below) and can be assessed as low, medium or high:

$S = (E+D+M) \times P$; where

S = Significance weighting

E = Extent
 D = Duration
 M = Magnitude
 P = Probability

Significance of impact		
Points	Significant Weighting	Discussion
< 30 points	Low	Where this impact would not have a direct influence on the decision to develop in the area.
31-60 points	Medium	Where the impact could influence the decision to develop in the area unless it is effectively mitigated.
> 60 points	High	Where the impact must have an influence on the decision process to develop in the area.

Confidence

This should relate to the level of confidence that the specialist has in establishing the nature and degree of impacts. It relates to the level and reliability of information, the nature and degree of consultation with I&AP's and the dynamic of the broader socio-political context.

- High, where the information is comprehensive and accurate, where there has been a high degree of consultation and the socio-political context is relatively stable.
- Medium, where the information is sufficient but is based mainly on secondary sources, where there has been a limited targeted consultation and socio-political context is fluid.
- Low, where the information is poor, a high degree of contestation is evident and there is a state of socio-political flux.

Status

- The status, which is described as either positive, negative or neutral.

Reversibility

- The degree to which the impact can be reversed.

Mitigation

- The degree to which the impact can be mitigated.

Nature:		
	Without mitigation	With mitigation
Construction Phase		
Probability		
Duration		
Extent		
Magnitude		
Significance		
Status (positive or negative)		
Operation Phase		
Probability		
Duration		
Extent		
Magnitude		
Significance		
Status (positive or negative)		
Reversibility		
Irreplaceable loss of resources?		
Can impacts be mitigated		

3. Mitigation measures

- *Mitigation: means to anticipate and prevent negative impacts and risks, then to minimise them, rehabilitate or repair impacts to the extent feasible.*

Impacts can be managed through one or a combination of the following mitigation measures:

- Avoidance
- Investigation (archaeological)
- Rehabilitation
- Interpretation
- Memorialisation
- Enhancement (positive impacts)

For the current study, the following mitigation measures are proposed, to be implemented only if any of the identified sites or features are to be impacted on by the proposed development activities:

- (1) Avoidance/Preserve: This is viewed to be the primary form of mitigation and applies where any type of development occurs within a formally protected or significant or sensitive heritage context and is likely to have a high negative impact. This measure often includes the change / alteration of development planning and therefore impact zones in order not to impact on resources. The site should be retained *in situ* and a buffer zone should be created around it, either temporary (by means of danger tape) or permanently (wire fence or built wall). Depending on the type of site, the buffer zone can vary from
 - 10 metres for a single grave, or a built structure, to
 - 50 metres where the boundaries are less obvious, e.g. a Late Iron Age site.
- (2) Archaeological investigation/Relocation of graves: This option can be implemented with additional design and construction inputs. This is appropriate where development occurs in a context of heritage significance and where the impact is such that it can be mitigated. Mitigation is to excavate the site by archaeological techniques, document the site (map and photograph) and analyse the recovered material to acceptable standards. This can only be done by a suitably qualified archaeologist.
 - This option should be implemented when it is impossible to avoid impacting on an identified site or feature.
 - This also applies for graves older than 60 years that are to be relocated. For graves younger than 60 years a permit from SAHRA is not required. However, all other legal requirements must be adhered to.
 - Impacts can be beneficial – e.g. mitigation contribute to knowledge
- (3) Rehabilitation: When features, e.g. buildings or other structures are to be re-used. Rehabilitation is considered in heritage management terms as an intervention typically involving the adding of a new heritage layer to enable a new sustainable use.
 - The heritage resource is degraded or in the process of degradation and would benefit from rehabilitation.
 - Where rehabilitation implies appropriate conservation interventions, i.e. adaptive reuse, repair and maintenance, consolidation and minimal loss of historical fabric.
 - Conservation measures would be to record the buildings/structures as they are (at a particular point in time). The records and recordings would then become the 'artefacts' to be preserved and managed as heritage features or (movable) objects.
 - This approach automatically also leads to the enhancement of the sites or features that are re-used.

- (4) Mitigation is also possible with additional design and construction inputs. Although linked to the previous measure (rehabilitation) a secondary though 'indirect' conservation measure would be to use the existing architectural 'vocabulary' of the structure as guideline for any new designs.
 - The following principle should be considered: **heritage informs design**.
 - This approach automatically also leads to the enhancement of the sites or features that are re-used.

- (5) No further action required: This is applicable only where sites or features have been rated to be of such low significance that it does not warrant further documentation, as it is viewed to be fully documented after inclusion in this report.
 - Site monitoring during development, by an ECO or the heritage specialist are often added to this recommendation in order to ensure that no undetected heritage/remains are destroyed.

4. Curriculum vitae

Johan Abraham van Schalkwyk

Qualifications

- 1995 DLitt et Phil (Anthropology), University of South Africa
- 1985 MA (Anthropology), University of Pretoria
- 1981 BA (Hons), Anthropology, University of Pretoria
- 1979 Post Graduate Diploma in Museology, University of Pretoria
- 1978 BA (Hons), Archaeology, University of Pretoria
- 1976 BA, University of Pretoria

Non-academic qualifications

- 12th HSRC-School in Research Methodology - July 1990
- Dept. of Education and Training Management Course - June 1992
- Social Assessment Professional Development Course - 1994
- Integrated Environmental Management Course, UCT - 1994

Professional experience

Private Practice

2017 - current: Professional Heritage Consultant

National Museum of Cultural History

- 1992 - 2017: Senior researcher: Head of Department of Research. Manage an average of seven researchers in this department and supervise them in their research projects. Did various projects relating to Anthropology and Archaeology in Limpopo Province, Mpumalanga, North West Province and Gauteng. Headed the Museum's Section for Heritage Impact Assessments.
- 1978 - 1991: Curator of the Anthropological Department of the Museum. Carried out extensive fieldwork in both anthropology and archaeology

Department of Archaeology, University of Pretoria

1976 - 1977: Assistant researcher responsible for excavations at various sites in Limpopo Province and Mpumalanga.

Awards and grants

1. Hanisch Book Prize for the best final year Archaeology student, University of Pretoria - 1976.
2. Special merit award, National Cultural History Museum - 1986.
3. Special merit award, National Cultural History Museum - 1991.
4. Grant by the Department of Arts, Culture, Science and Technology, to visit the various African countries to study museums, sites and cultural programmes - 1993.
5. Grant by the USA National Parks Service, to visit the United States of America to study museums, sites, tourism development, cultural programmes and impact assessment programmes - 1998.
6. Grant by the USA embassy, Pretoria, under the Bi-national Commission Exchange Support Fund, to visit cultural institutions in the USA and to attend a conference in Charleston - 2000.
7. Grant by the National Research Foundation to develop a model for community-based tourism - 2001.

8. Grant by the National Research Foundation to develop a model for community-based tourism - 2013. In association with RARI, Wits University.

Publications

Published more than 70 papers, mostly in scientifically accredited journals, but also as chapters in books.

Conference Contributions

Regularly presented papers at conferences, locally as well as internationally, on various research topics, ranging in scope from archaeology, anthropological, historical, cultural historical and tourism development.

Heritage Impact Assessments

Since 1992, I have done more than 2000 Phase 1 and Phase 2 impact assessments (archaeological, anthropological, historical and social) for various government departments and developers. Projects include environmental management frameworks, roads, pipeline-, and power line developments, dams, mining, water purification works, historical landscapes, refuse dumps and urban developments.