



**MOOI PLAATS, WONDERHEUVEL, PAARDE
VALLEY SOLAR POWER (PTY) LTD**

PROPOSED UMSOBOMVU SOLAR PV ENERGY FACILITIES

Heritage Scoping Report

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For:	SiVEST Environmental Division

The heritage impact assessment report has been compiled considering the NEMA Appendix 6 requirements for specialist reports as indicated in the table below.

Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	Relevant section in report
1.(1) (a) (i) Details of the specialist who prepared the report	Page 2 of Report – Contact details and company
(ii) The expertise of that person to compile a specialist report including a curriculum vita	Section 1.2 – refer to Appendix D
(b) A declaration that the person is independent in a form as may be specified by the competent authority	Page ii of the report
(c) An indication of the scope of, and the purpose for which, the report was prepared	Section 1.1
(cA) An indication of the quality and age of base data used for the specialist report	Section 3.1
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 5.1
(d) The duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 3.1
(e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 3.1 and Appendix B
(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;	Section 4.1
(g) An identification of any areas to be avoided, including buffers	Section 4
(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;	Section 4.1
(i) A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 1.3
(j) A description of the findings and potential implications of such findings on the impact of the proposed activity, including identified alternatives, on the environment	Section 4.1 and 5
(k) Any mitigation measures for inclusion in the EMPr	Interim Section 6
(l) Any conditions for inclusion in the environmental authorisation	Interim Section 6
(m) Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Interim Section 6
(n)(i) A reasoned opinion as to whether the proposed activity, activities or portions thereof should be authorised and	Interim Section 6
(n)(iA) A reasoned opinion regarding the acceptability of the proposed activity or activities; and	
(n)(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	Interim Section 6
(o) A description of any consultation process that was undertaken during the course of carrying out the study	Not applicable. A public consultation process was handled as part of the EIA and EMP process.
(p) A summary and copies if any comments that were received during any consultation process	Not applicable. To date not comments regarding heritage resources that require input from a specialist have been raised.

(q) Any other information requested by the competent authority.	Not applicable.
(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.	No protocols or minimum standards for HIAs or PIAs promulgated through a governmental notice.

EXECUTIVE SUMMARY

PGS Heritage (Pty) Ltd was appointed by SiVEST Environmental Division to undertake a Heritage Scoping Report that forms part of the Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) for the Umsombomvu Solar Energy Facilities close to Noupoort 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 Heritage Scoping Report has shown that the proposed Umsombomvu sites to be developed as PV Facilities may have heritage resources present on the property. This has been confirmed through archival research and evaluation of aerial photography of the sites.

The projected impact assessment indicates that unmitigated impacts during construction can be MEDIUM to HIGH but reduced to LOW with the implementation of management measures. Impacts during the operational and decommissioning phase is projected to be LOW with the implementation of management measures.

These findings provide the basis for the recommendation:

- further field thruthing through an archaeological walk down and palaeontological study covering the site. The aim of this will be to compile a comprehensive database of heritage sites in the study areas, with the aim of developing a heritage management plan for inclusion in the Environmental Management Plan as derived from the EIA.

At this stage none of the PV and grid options for the 3 projects are preferred above the others.

It is my considered opinion, based on the current data available, that with the consideration of the position of heritage sensitivities during the layout design the project will have an acceptable low impact on heritage resources and can continue.

BIO THERM ENERGY (PTY) LTD

HERITAGE IMPACT REPORT

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- A: LEGISLATIVE PRINCIPLES
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1 INTRODUCTION

PGS Heritage (Pty) Ltd was appointed by SiVEST Environmental Division to undertake a Heritage Scoping Report that forms part of the respective Environmental Impact Assessments (EIAs) and Environmental Management Programmes (EMPrs) for the Umsombomvu Solar Energy Facilities close to Noupoort and Middelburg in the Northern and Eastern Cape Provinces.

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 be investigated in the EIA study. The HSR aims to inform the Heritage Impact Assessment (HIA) and ultimately the Environmental Impact Assessment (EIA) in the development of a comprehensive Environmental Management Programme (EMPr) 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.

The accuracy of Palaeontological Impact Assessments, that is included as part of the HIA, is reduced by several factors which may include the following: the databases of institutions are not always up to date and relevant locality and geological information was not accurately documented in the past. Various remote areas of South Africa have not been assessed by palaeontologists and data is based on aerial photographs alone. Geological maps concentrate on the geology of an area and the sheet explanations were never intended to focus on palaeontological heritage.

Similar Assemblage Zones, but in different areas are used to provide information on the presence of fossil heritage in an unmapped area. Desktop studies of similar geological formations and Assemblage Zones generally assume that exposed fossil heritage is present within the development area. The accuracy of the Palaeontological Impact Assessment is thus improved considerably by conducting a field-assessment.

Due to the prohibitive size of the application area during the Scoping phase, it was agreed that fieldwork related to the heritage assessment will only be done in the EIA phase when the

footprint areas have been determined and significantly reduced, based on environmental sensitive areas determined by the other specialists.

1.3 Specialist Qualifications

PGS Heritage (PGS) compiled this Heritage Scoping Report.

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).

Elize Butler has an MSc in Palaeontology from the University of the Free State, Bloemfontein, South Africa. She has been working in Palaeontology for more than twenty-four years. She has extensive experience in locating, collecting and curating fossils, including exploration field trips in search of new localities in the Karoo Basin. She has been a member of the Palaeontological Society of South Africa for 12 years. She has been conducting PIAs since 2014.

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

- Basic Environmental Assessment (BEA) – Section (23)(2)(d)
- Environmental Scoping Report (ESR) – Section (29)(1)(d)
- Environmental Impact Assessment (EIA) – Section (32)(2)(d)
- Environmental Management Plan (EMP) – Section (34)(b)

National Heritage Resources Act (NHRA) Act 25 of 1999

- Protection of Heritage Resources – Sections 34 to 36; and

- 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 utilized 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. This study falls under s38(8) and requires comment from the relevant heritage resources authority.

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.

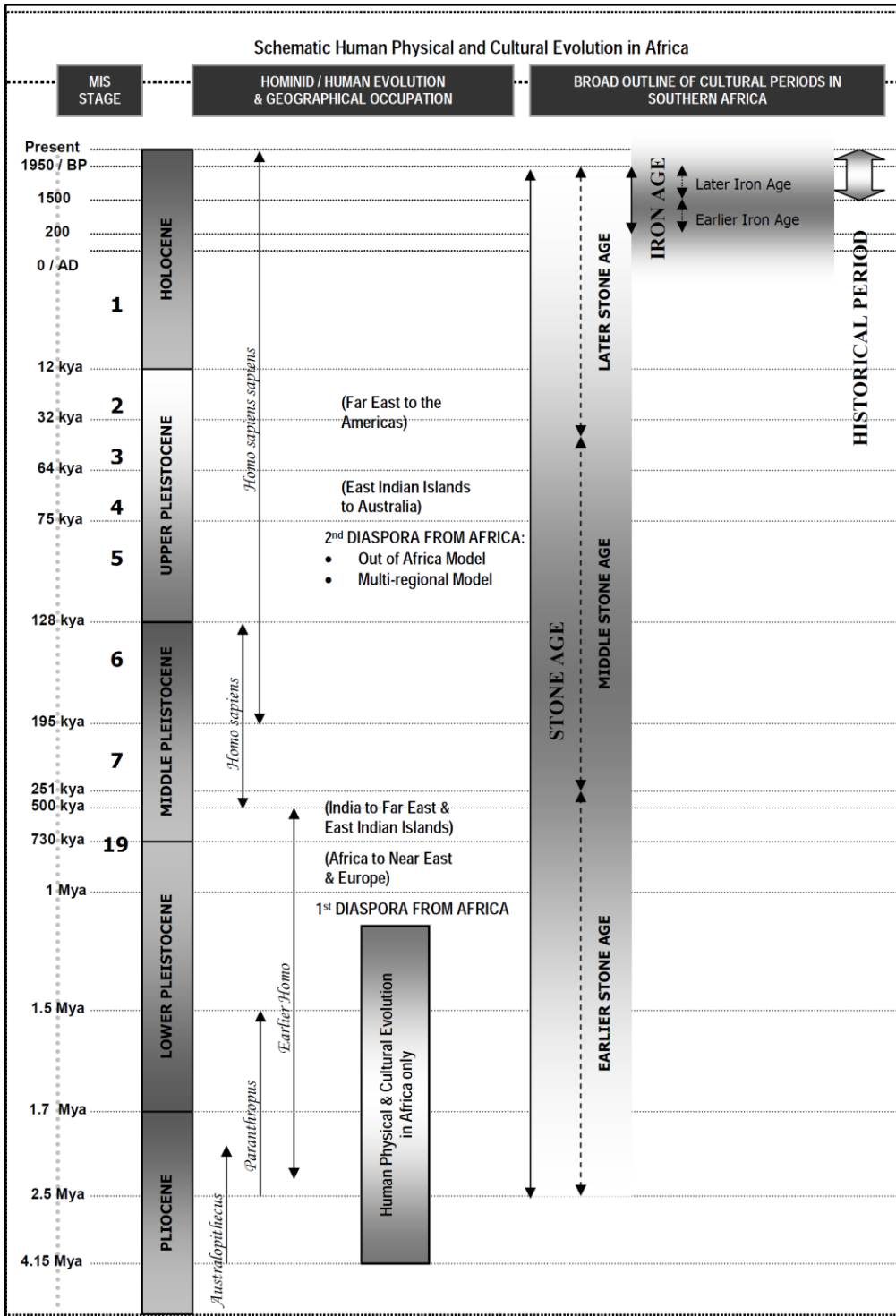


Figure 1: Human and Cultural Timeline in Africa (Morris, 2008)

2 TECHNICAL DETAILS OF THE PROJECT

It is proposed that three (3) Solar Photovoltaic (PV) Energy Facilities, with associated grid connection infrastructure, will be developed, these being:

- ***Mooi Plaats Solar PV Facility***, on an application site of approximately 5303ha, comprising the following farm portions:
 - Portion 1 of Leuwe Kop No 120
 - Remainder of Mooi Plaats No 121

- ***Wonderheuvel Solar PV Facility***, on an application site of approximately 5652ha, comprising the following farm portions:
 - Remainder of Mooi Plaats No 121
 - Portion 3 of Wonder Heuvel No 140
 - Portion 5 of Holle Fountain No 133

- ***Paarde Valley Solar PV Facility***, on an application site of approximately 2631ha, comprising the following farm portion:
 - Portion 2 of Paarde Valley No 62

The solar PV projects are shown in Maps 1, 2 and 3, below.

2.1 Solar PV Components

The three Solar PV facilities will include the following components:

- PV fields (arrays) comprising multiple PV panels. The number of panels, the generation capacity of each facility and the layout of the arrays will be dependent on the outcome of the specialist studies conducted during the EIA process.
- PV panels will be either fixed tilt mounting or single axis tracking mounting, and the modules will be either crystalline silicon or thin film technology. Each panel will be approximately 2m wide and between 1m and 4m in height, depending on the mounting type.
- Internal roads, between 4m and 10m wide, will provide access to the PV arrays. Existing site roads will be used wherever possible, although new site roads will be constructed where necessary.
- Each PV facility will include up to two (2) temporary construction laydown/staging areas of approximately 10ha each.
- Operation and maintenance (O&M) buildings will be provided for each PV field, occupying a site of approximately 2 500m² (50m x 50m).
- Medium voltage cabling will link the PV plant to the grid connection infrastructure. These cables will be laid underground wherever technically feasible.

2.2 Grid Connection Infrastructure

The proposed grid connection infrastructure for each PV facility is being assessed as part of a separate BA application. The grid connections will include the following components:

- New on-site substations and collector substations to serve each PV facility, each occupying an area of up to 4ha.

- A new 132kV overhead power line connecting the on-site substations or collector substations to either Hydra D Main Transmission Substation (MTS) or the proposed Coleskop Wind Energy Facility (WEF) substation from where the electricity will be fed into the national grid. The type of power line towers being considered at this stage to include both lattice and monopole towers which will be up to 25m in height.

Two grid connection infrastructure alternatives have been provided for each PV project. These alternatives essentially provide for two different route alignments with associated substations contained within an assessment corridor of approximately 400m wide. These alternatives are as follows:

- ***Mooi Plaats Solar PV Grid Connection***

- Corridor Option 1 is approximately 13kms in length, linking Substations 1 and 2 to Hydra D MTS.
- Corridor Option 2 is approximately 27kms in length, linking Substations 1 and 2 to Hydra D MTS via the proposed Central Collector substation located on the Wonderheuvel PV project application site.

- ***Wonderheuvel Solar PV Grid Connection***

- Corridor Option 1 involves two separate grid connections to serve the northern and southern sectors of the application site. The northern connection is approximately 18kms in length, linking the proposed on-site Substation 3 to Hydra D MTS via the Northern Collector substation. The southern connection is approximately 17kms in length, linking Substation 4 to the proposed Coleskop WEF substation via the Southern Collector substation located on the Paarde Valley PV project application site.
- Corridor Option 2 is approximately 20kms in length, linking Substations 3 and 4 to Hydra D MTS via the proposed Central Collector substation located on the Wonderheuvel PV project application site.

- ***Paarde Valley Solar PV Grid Connection***

- Corridor Option 1 is approximately 14kms in length, linking Substation 6 to the proposed Coleskop WEF substation via the Southern Collector substation.
- Corridor Option 2 is approximately 26kms in length, linking Substations 5 and 6 to Hydra D MTS via the proposed Central Collector substation located on the Wonderheuvel PV project application site.

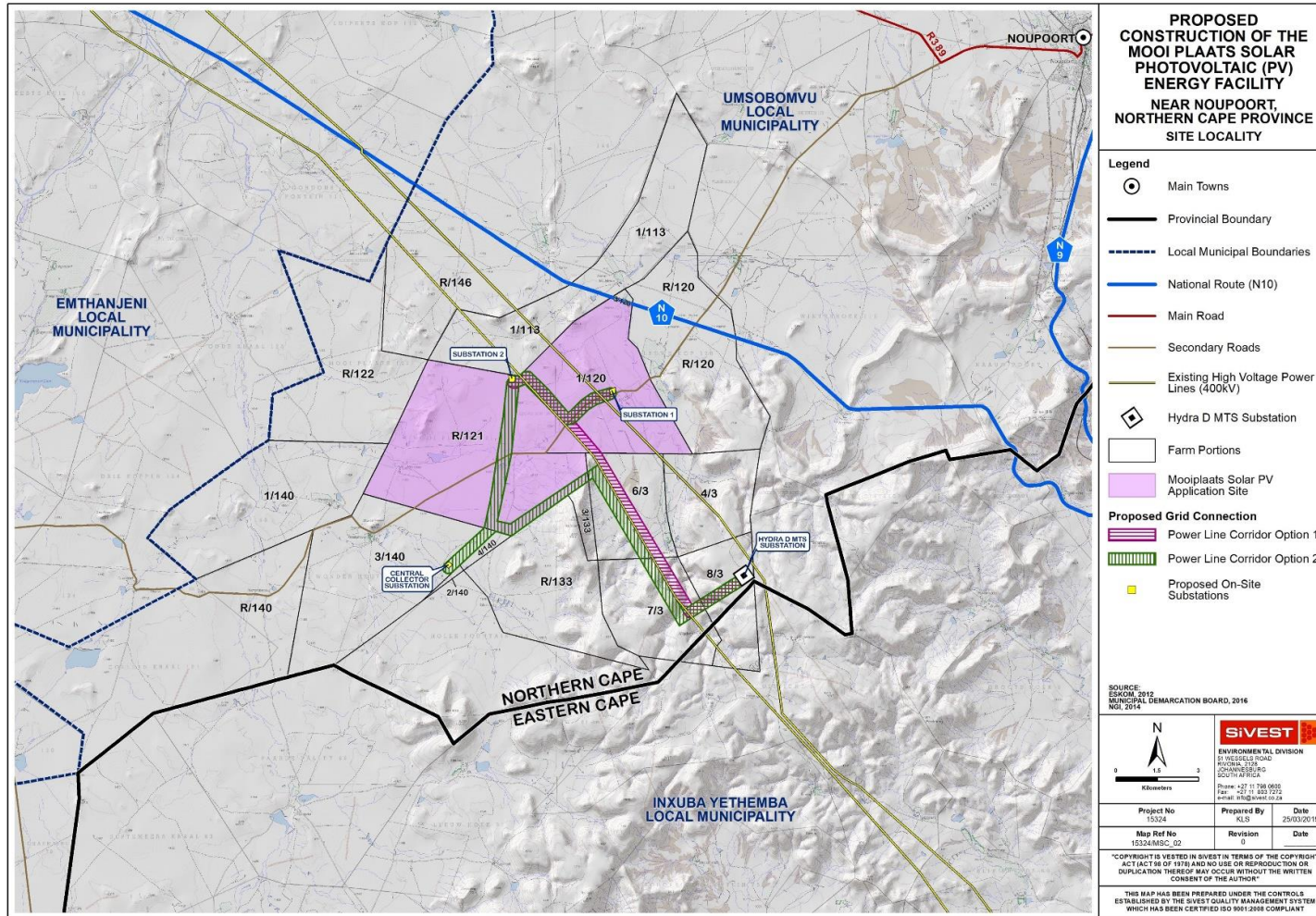


Figure 2: Mooi Plaats Solar PV Facility

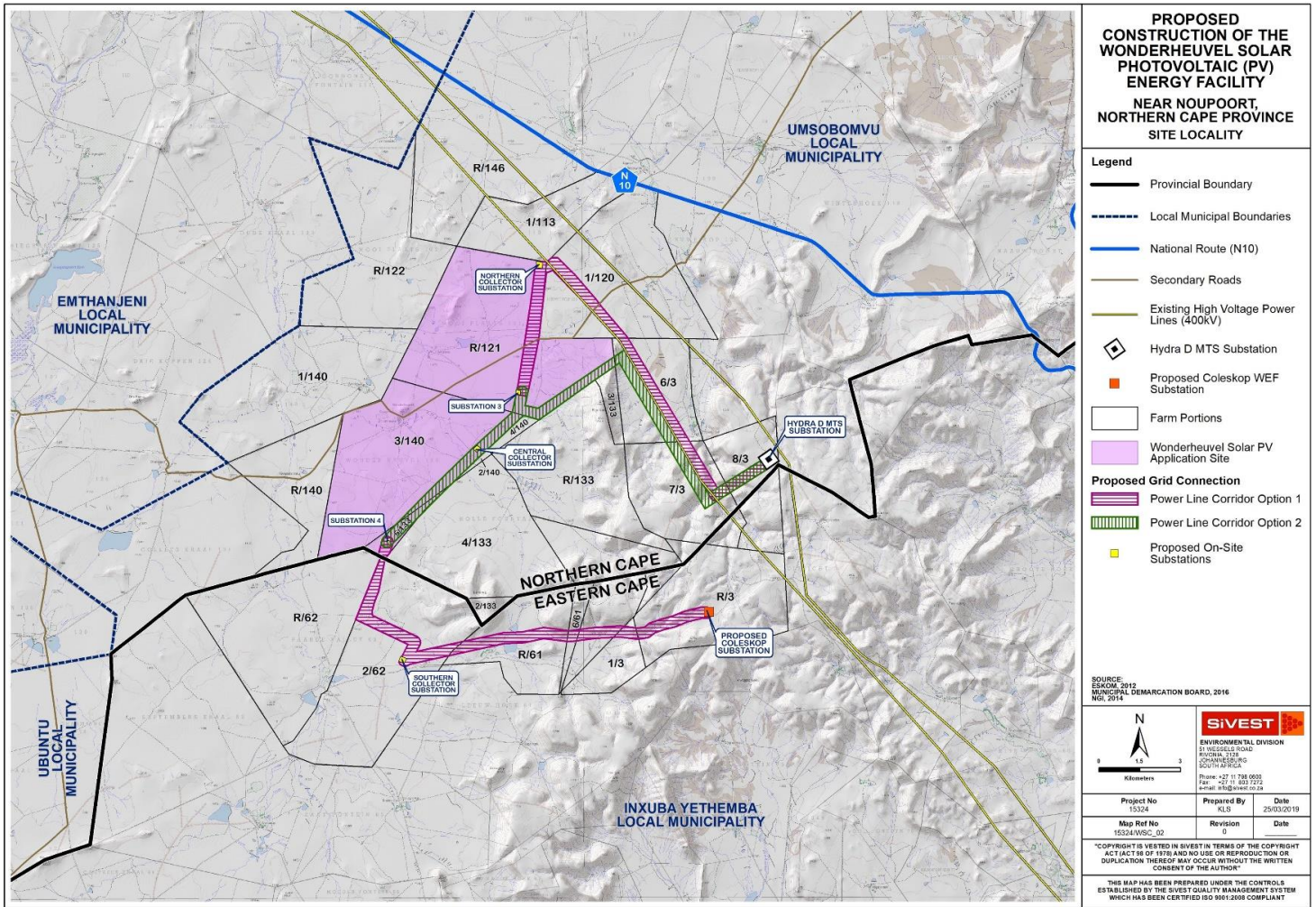


Figure 3: Wonderheuvvel Solar PV Facility

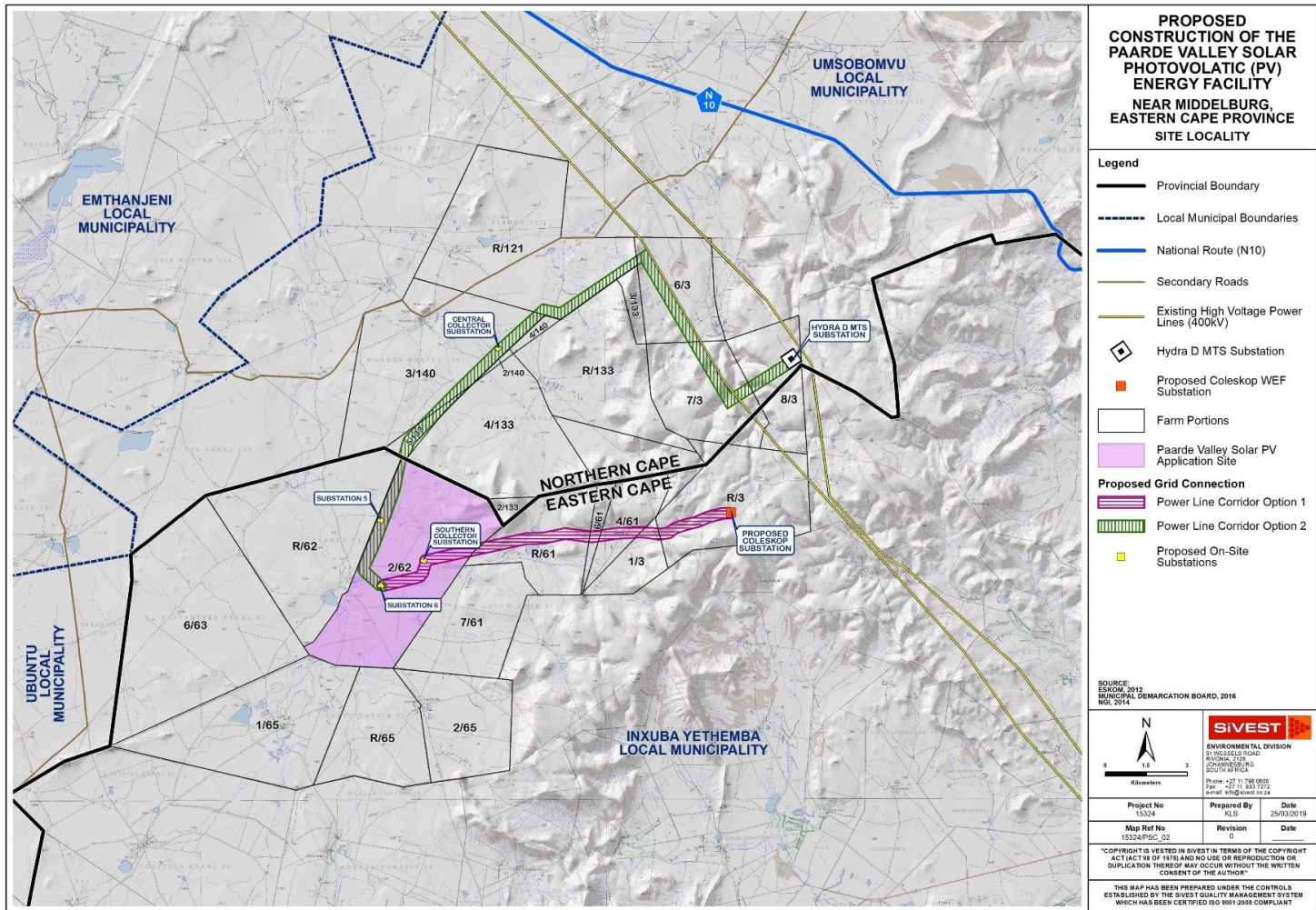


Figure 4: Paarde Valley Solar PV Energy Facility.

3 ASSESSMENT METHODOLOGY

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

3.1 Methodology for Assessing Heritage Site significance

This HSR report was compiled by PGS for the Proposed Umsobomvu Solar PV Energy Facilities. The applicable maps, tables and figures, are included as stipulated in the NHRA (no 25 of 1999), the National Environmental Management Act (NEMA) (no 107 of 1998). The HIA process consisted of three steps:

3.1.1 Scoping Phase

Step I – Literature Review: The background information to the field survey relies greatly on the Heritage Background Research.

NOTE: Due to the prohibitive size of the application area during the Scoping phase, it was agreed that fieldwork related to the heritage assessment will only be done in the EIA phase when the footprint areas have been determined and significantly reduced, based on environmental sensitive areas determined by the other specialists.

3.1.2 Impact Assessment Phase

Step II – Physical Survey: A physical survey was conducted on foot and by vehicle through the proposed project area by two qualified archaeologists and two field assistants, which aimed at locating and documenting sites falling within and adjacent to the proposed development footprint. *Completed end of October 2016.*

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>), will assist in determining what types of 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 will be listed in the HIA as background to the study area.

4.1.1 Findings from the studies

Palaeontology

The following is extracted from the Palaeontological Impact Assessment (PIA) completed by Butler (2019) – Refer to **Appendix E** for the full PIA.

The proposed development includes three PV facilities as well as grid connections and infrastructure. These proposed developments are underlain by the continental sediments of the Latest Permian sediments of the Balfour Formation (Upper Beaufort Group, Adelaide Subgroup) and earliest Triassic sediments of the Katberg Formation (Upper Beaufort Group, Tarkastad Subgroup, Karoo Supergroup) as well as Jurassic Karoo Dolerite. These sediments are generally mantled by a thick layer of Quaternary to Recent colluvium and alluvium. The uppermost Balfour and Katberg Formations are of extraordinary interest in that they provide some of the best existing information on ecologically-complex terrestrial ecosystems during the catastrophic end-Permian mass extinction. According to the PalaeoMap of South African Heritage Resources Information System the Palaeontological Sensitivity of the Tarkastad and Adelaide Subgroups has a Very High Palaeontological Sensitivity, while that of the Quaternary superficial deposits of the Central interior is high and the Karoo dolerite (igneous rocks) is insignificant and rated as zero (Figure 5 to Figure 7).

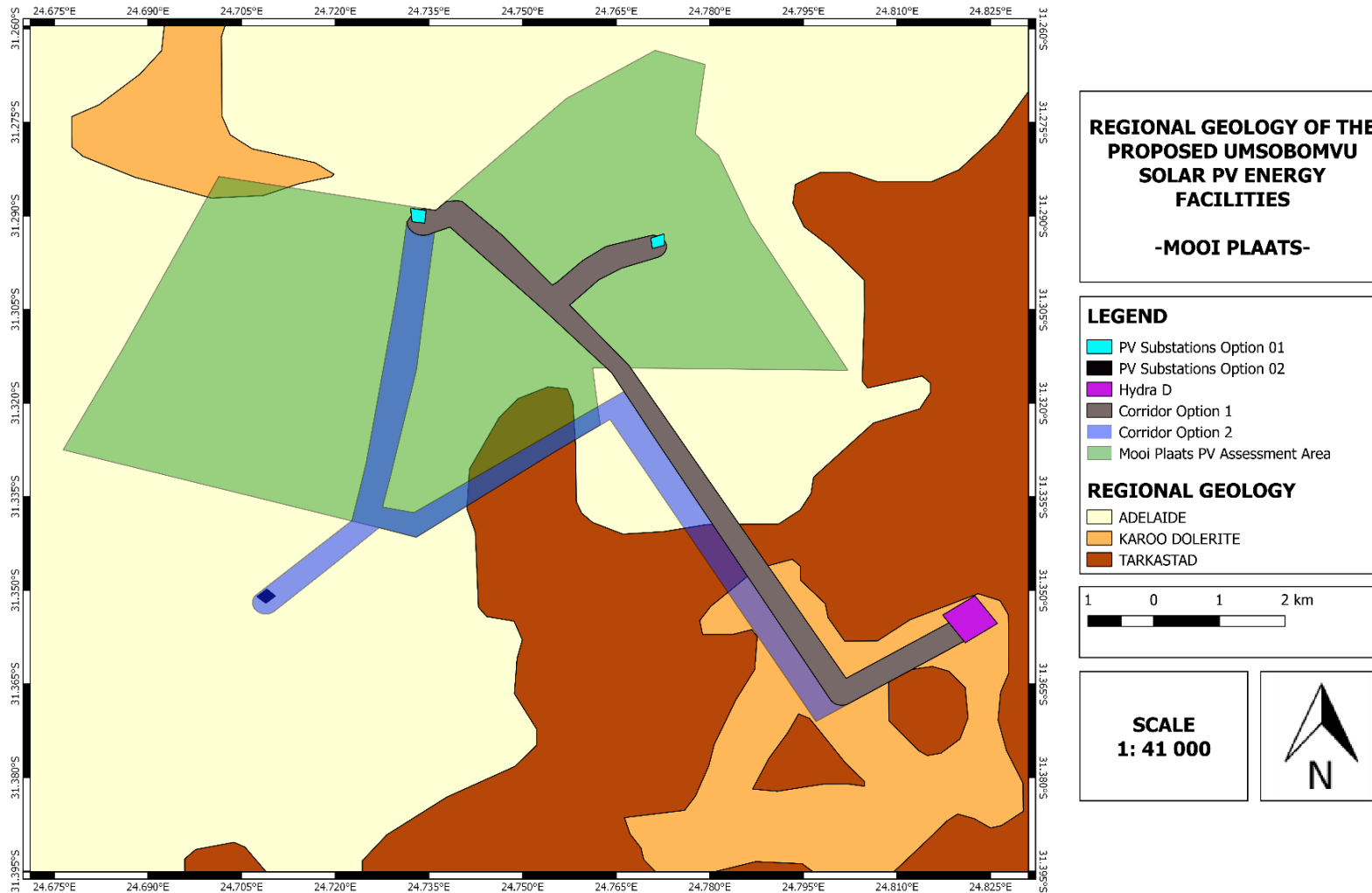


Figure 5: Surface geology of the proposed Umsobomvu Solar PV Energy Facilities: Mooi Plaats. The proposed development is underlain by the Adelaide and Tarkastad Subgroup, Beaufort Group, Karoo Supergroup) as well as Jurassic Karoo Dolerite. Map drawn QGIS Desktop 2.18.1. Map drawn QGIS Desktop 2.18.1

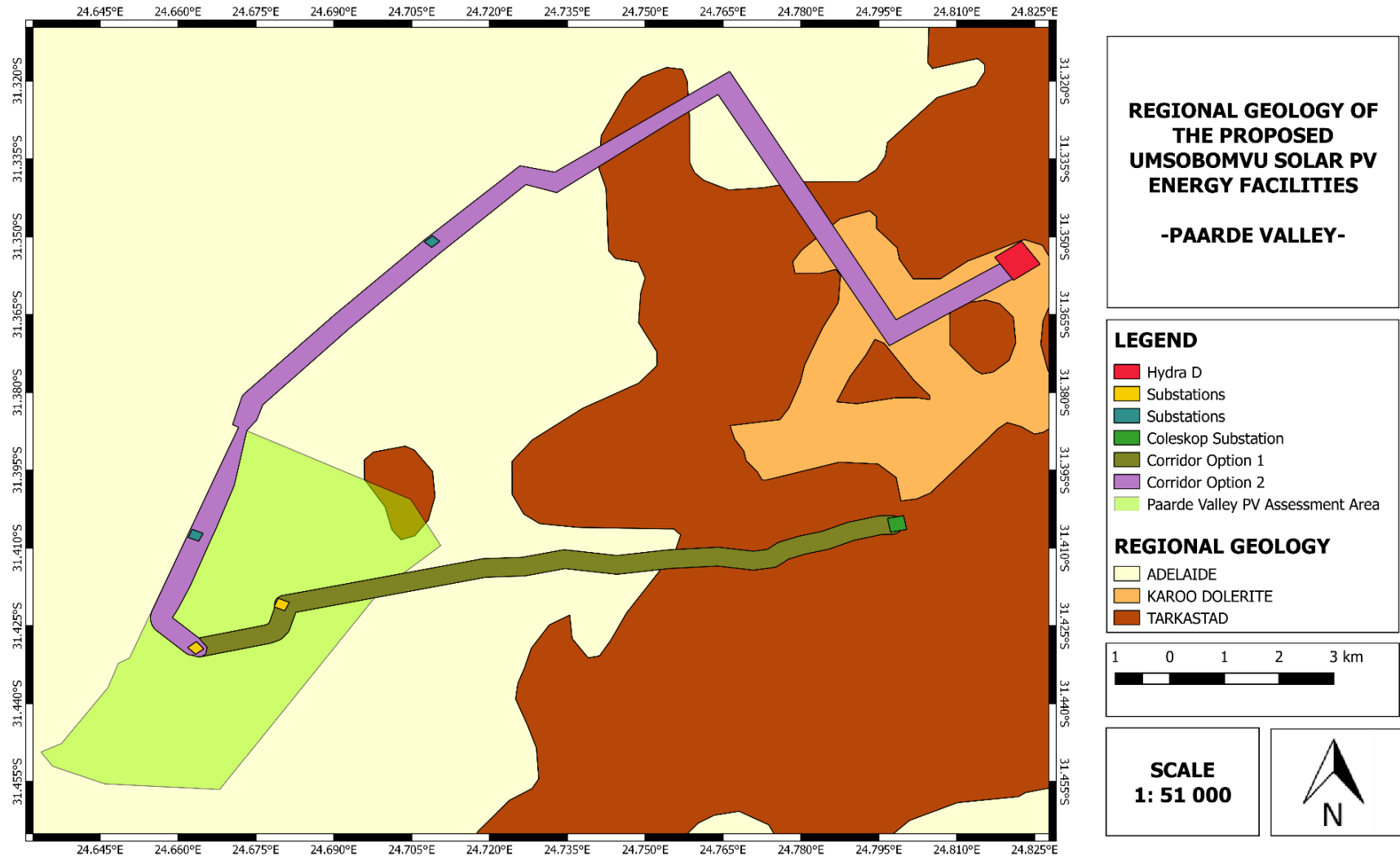


Figure 6: Surface geology of the proposed Umsobomvu Solar PV Energy Facilities: Paarde Valley. The proposed development is underlain by the Adelaide and Tarkastad Subgroup, Beaufort Group, Karoo Supergroup) as well as Jurassic Karoo Dolerite. Map drawn QGIS Desktop 2.18.1

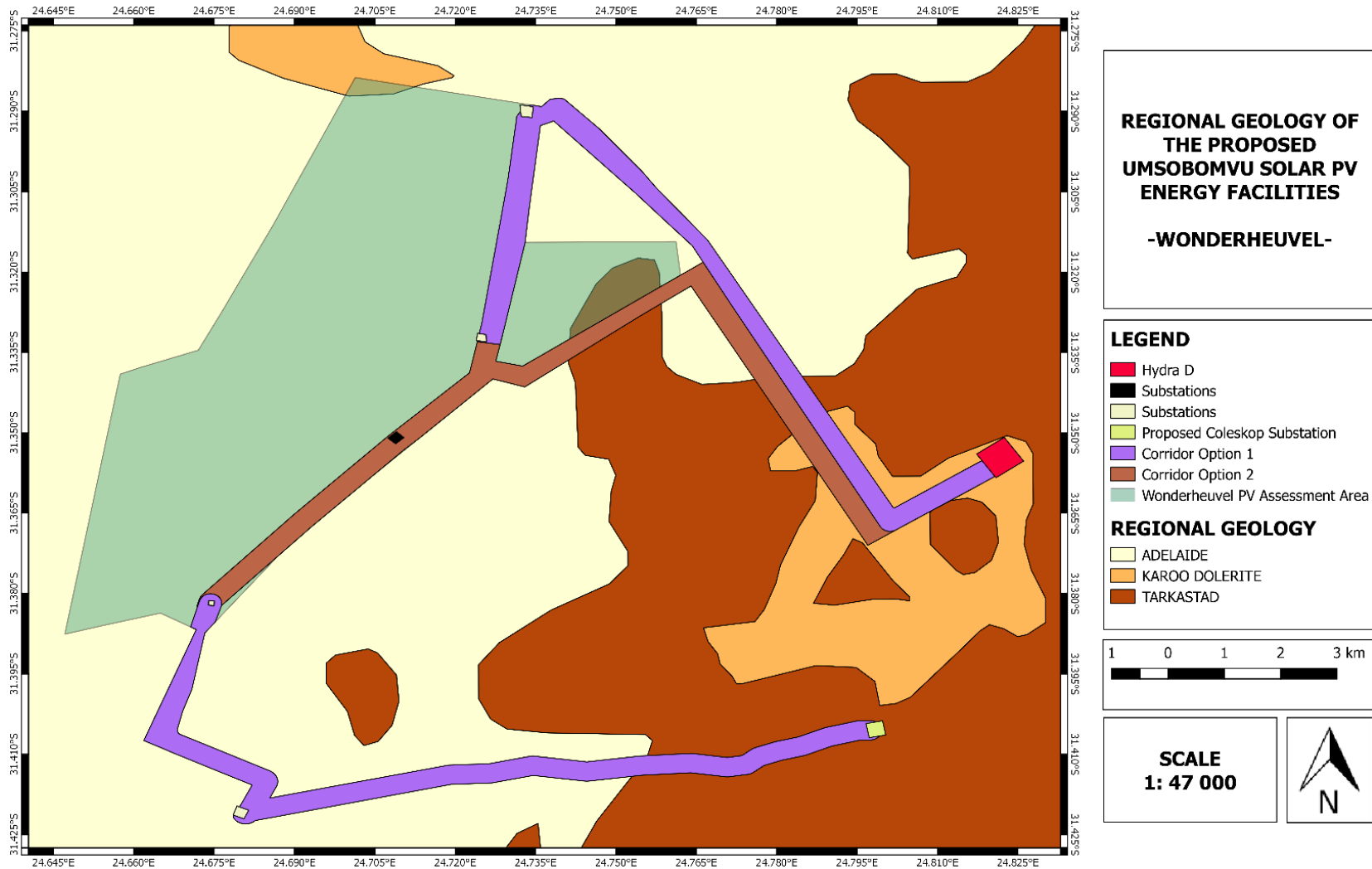


Figure 7: Surface geology of the proposed Umsobomvu Solar PV Energy Facilities: Wonderheuveld. The proposed development is underlain by the Adelaide and Tarkastad Subgroup, Beaufort Group, Karoo Supergroup) as well as Jurassic Karoo Dolerite. Map drawn QGIS Desktop 2.18.1

STRATIGRAPHY						
AGE		WEST OF 24'E	EAST OF 24' E	FREE STATE/ KWAZULU- NATAL	SACS RECOGNISED ASSEMBLAGE ZONES	PROPOSED BIOSTRATIGRAPHIC SUBDIVISIONS
JURASSIC	"STORMBERG"	[Dotted pattern]	Drakensberg F.	Drakensberg F.		
			Clarens F.	Clarens F.		<i>Massospondylus</i>
TRIASSIC	TARKASTAD SUBGROUP	[Dotted pattern]	Elliot F.	Elliot F.		" <i>Euskelosaurus</i> "
			MOLTENO F.	MOLTENO F.		
PERMIAN	BEAUFORT GROUP	ADELAIDE SUBGROUP	BURGERSDORP F.	DRIEKOPPEN F.	<i>Cynognathus</i>	
			KATBERG F.	VERKYKERSKOP F.	<i>Lystrosaurus</i>	<i>Procolophon</i>
			Palingkloof M.	Harrismith M.	<i>Daptocephalus</i>	
			Elandsberg M.	Schoondraai M.		
			Barberskrans M.	Rooinekke M.		
			Daggaboersnek M.	Frankfort M.		
	TEEKLOOF F.	BALFOUR F.	NORMANDIEN F.	VOLKSRUST F.	<i>Cistecephalus</i>	
	Oukloof M.	Oudeberg M.			<i>Tropidostoma</i>	
	Hoedemaker M.	MIDDELTON F.			<i>Priesterognathus</i>	
	Poortjie M.				<i>Tapinocephalus</i>	UPPER UNIT
	ABRAHAMSKRAAL F.	KROONAP F.			<i>Eodicynodon</i>	LOWER UNIT
	ECCA GROUP			WATERFORD F.	WATERFORD F.	
TIERBERG/ FORT BROWN F.				FORT BROWN F.		
LAINGSBURG/ RIPON F.				RIPON F.	VRYHEID F.	
COLLINGHAM F.				COLLINGHAM F.	PIETER- MARITZBURG F.	
WHITEHILL F.				WHITEHILL F.		
PRINCE ALBERT F.				PRINCE ALBERT F.		<i>'Mesosaurus'</i>
CARBON- IFEROUS	DWYKA GROUP		ELANDSVLEI F.	ELANDSVLEI F.		

SANDSTONE-RICH UNIT
 HIATAL SURFACE
 END BEAUFORT GROUP
 HIATUS

Figure 8: Lithostratigraphic (rock-based) and biostratigraphic (fossil-based) subdivisions Beaufort Group of the Karoo Supergroup with rock units and fossil assemblage zones relevant to the present study marked in red (Modified from Rubidge, 1995). Abbreviations: F. = Formation, M. = Member

The proposed development includes three PV facilities as well as grid connections and infrastructure. These proposed developments are underlain by the continental sediments of the

Latest Permian sediments of the Balfour Formation (Upper Beaufort Group, Adelaide Subgroup) and earliest Triassic sediments of the Katberg Formation (Upper Beaufort Group, Tarkastad Subgroup, Karoo Supergroup) as well as Jurassic Karoo Dolerite. These sediments are generally mantled by a thick layer of Quaternary to Recent colluvium and alluvium. The uppermost Balfour and Katberg Formations are of extraordinary interest in that they provide some of the best existing information on ecologically-complex terrestrial ecosystems during the catastrophic end-Permian mass extinction. According to the PalaeoMap of South African Heritage Resources Information System the Palaeontological Sensitivity of the Tarkastad and Adelaide Subgroups has a Very High Palaeontological Sensitivity, while that of the Quaternary superficial deposits of the Central interior is high and the Karoo dolerite (igneous rocks) is insignificant and rated as zero.

A site specific field survey of the development footprint were conducted on foot and by motor vehicle from the 24th – 28th January 2019. Elsewhere in the Karoo Basin numerous fossils have been uncovered in these geological sediments but only two sites on koppies with fossiliferous outcrops were identified. These fossiliferous sites have been identified as Highly Sensitive and No-go areas. It is recommended that a 50 m buffer will be placed around these areas. In the event that construction is necessary in these sensitive areas it is recommended that the fossils will be collected by a professional palaeontologist. Preceding excavation of any fossil material, the specialist would need to apply for a collection permit from SAHRA. Fossil material must be curated in an accredited collection (museum or university collection), while all fieldwork and reports should meet the minimum standards for palaeontological impact studies suggested by SAHRA.

4.1.2 *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.

4.1.3 *Possible finds*

Evaluation of aerial photography has indicated that certain areas may be sensitive from an archaeological perspective (**Figure 9 to Figure 11**). The analysis of the studies conducted in the area assisted in the development of the following landform type to heritage find matrix in Table 2.

Table 2: 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

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

- Archaeological walk through of the areas where the project will be impacting;
- Palaeontological desktop assessment of the areas and selective site visits where required by the palaeontologist;

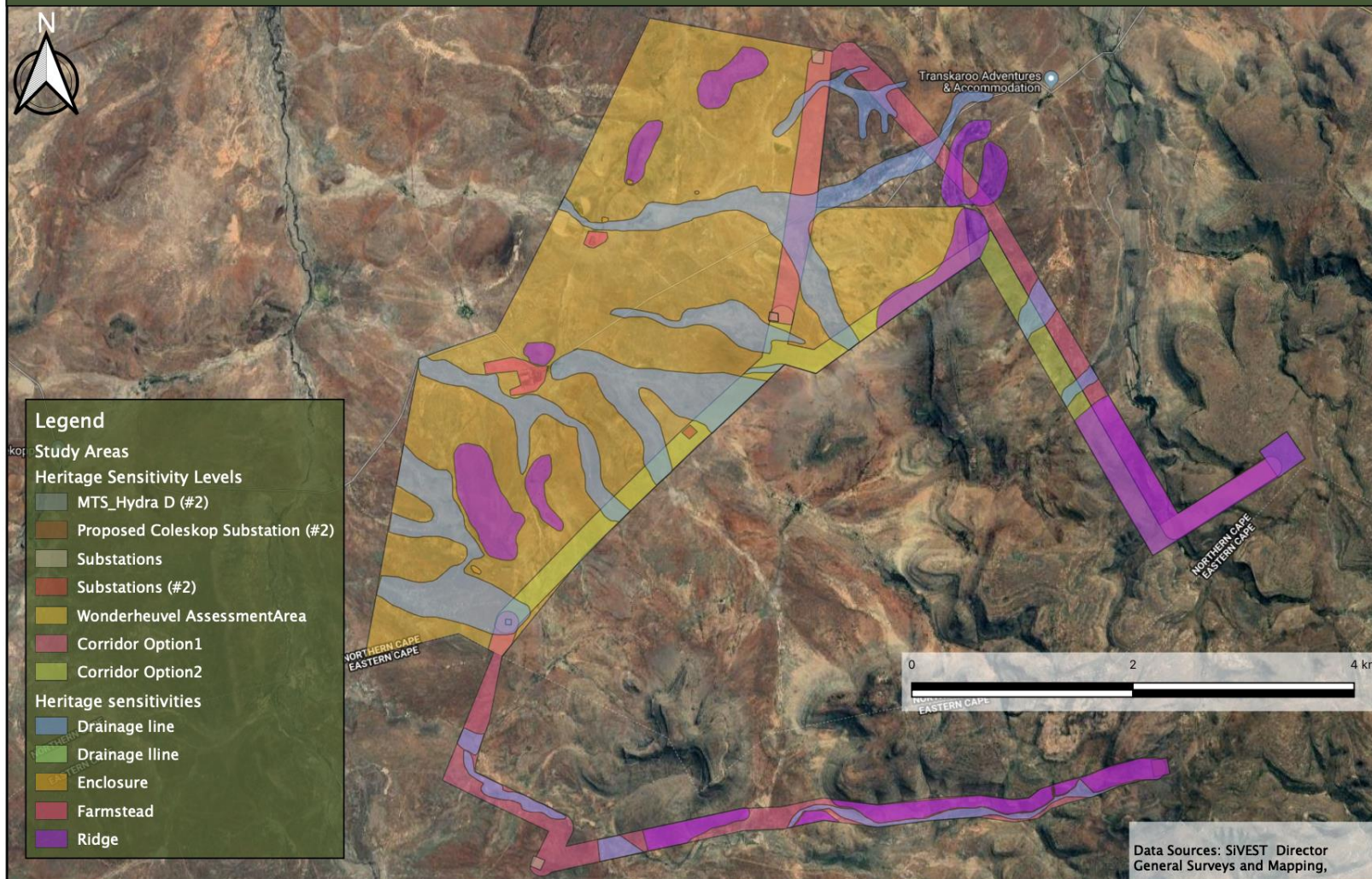


Figure 9: Possible heritage sensitive areas – Wonderheuveld



Figure 10: Possible heritage sensitive areas – Paarde Valley

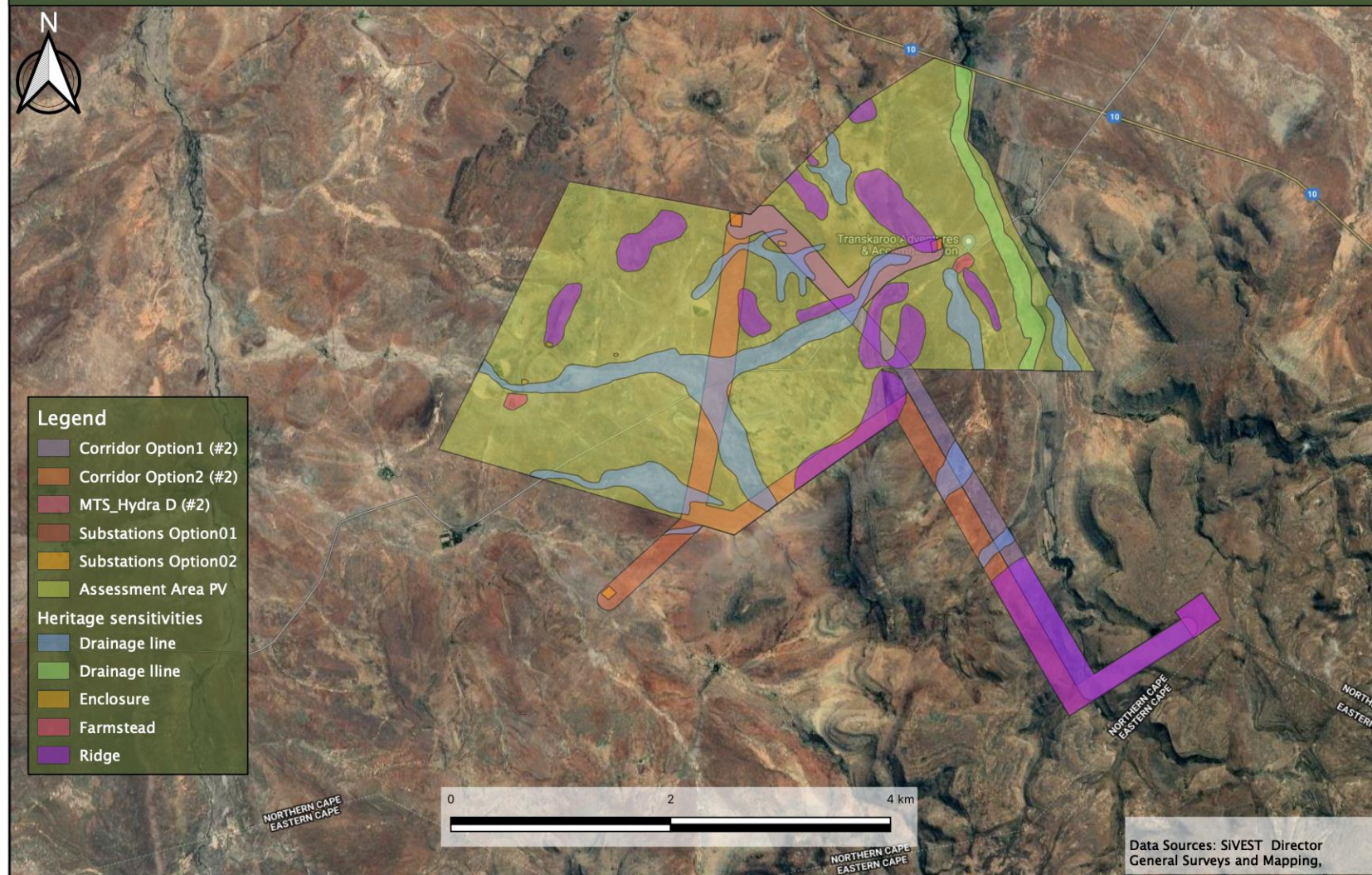


Figure 11: Possible heritage sensitive areas – Mooi Plaats. Impact assessment

5 IMPACT RATINGS

The following impact rating tables are based on the completed desktop base assessment but is indicative of the type of impact expected and to be confirmed on the fieldwork to be done on the final layouts. As the projected impact on heritage resources is seen as the same on all the alternatives, a single impact rating table is provided (Table 3) for all three (3) proposed Solar PV Energy Facilities. The impact assessment rating is based on the rating scale as contained in Appendix B and Appendix C.

NOTE: After consideration of the proposed layout in relation to the heritage field work to be completed during the EIA phase, these tables will be developed for each of the alternatives.

Table 3: Combined impact table for the Mooi Plaats, Wonderheuvel and Paarde Valley PV and grid options

ENVIRONMENTAL PARAMETER	ISSUE / IMPACT / ENVIRONMENTAL EFFECT/ NATURE	ENVIRONMENTAL SIGNIFICANCE BEFORE MITIGATION									RECOMMENDED MITIGATION MEASURES	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION								
		E	P	R	L	D	I/M	TOTAL	STATUS (+ OR -)	S		E	P	R	L	D	I/M	TOTAL	STATUS (+ OR -)	S
Construction Phase																				
Impact on Stone Age resources	Impact on stone age resources during earth moving - including trenching, road making, foundation digging	1	2	4	4	4	4	60	-	High impact	** Assessment of designated foot print areas of the infrastructure **Implementation of mitigation measures such as buffering, documentation and excavations and request destruction	1	1	4	4	4	2	28	-	Medium impact

ENVIRONMENTAL PARAMETER	ISSUE / IMPACT / ENVIRONMENTAL EFFECT/ NATURE	ENVIRONMENTAL SIGNIFICANCE BEFORE MITIGATION									RECOMMENDED MITIGATION MEASURES	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION														
		E	P	R	L	D	I/M	TOTAL	STATUS (+ OR -)	S		E	P	R	L	D	I/M	TOTAL	STATUS (+ OR -)	S						
												permits from SAHRA														
Impact on colonial buildings	Impact on stone age resources during earth moving - including trenching, road making, foundation digging	1	2	4	4	4	4	60	-	High impact	** Assessment of designated foot print areas of the infrastructure **Implementation of mitigation measures such as buffering, documentation and excavations and request destruction permits from SAHRA	1	1	4	4	4	2	28	-	Medium impact						

ENVIRONMENTAL PARAMETER	ISSUE / IMPACT / ENVIRONMENTAL EFFECT/ NATURE	ENVIRONMENTAL SIGNIFICANCE BEFORE MITIGATION									RECOMMENDED MITIGATION MEASURES	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION								
		E	P	R	L	D	I/M	TOTAL	STATUS (+ OR -)	S		E	P	R	L	D	I/M	TOTAL	STATUS (+ OR -)	S
Impact on chance finds	Impact on stone age resources during earth moving - including trenching, road making, foundation digging	1	1	4	4	4	4	56	-	High impact	** development of chance find procedures to be included in the EMP **Implementation of mitigation measures such as buffering, documentation and excavations and request destruction permits from SAHRA	1	1	4	4	4	2	28	-	Medium impact
Impact on palaeontological resources – fossil heritage	Impact on stone age resources during earth moving - including trenching, road making, foundation digging	1	2	4	4	4	4	60	-	High impact	** Assessment of designated foot print areas of the infrastructure **Implementation of mitigation measures such as buffering, documentation and excavations and request destruction permits from SAHRA	1	1	4	4	4	2	28	-	Medium Impact
Operational Phase																				

ENVIRONMENTAL PARAMETER	ISSUE / IMPACT / ENVIRONMENTAL EFFECT/ NATURE	ENVIRONMENTAL SIGNIFICANCE BEFORE MITIGATION									RECOMMENDED MITIGATION MEASURES	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION								
		E	P	R	L	D	I/M	TOTAL	STATUS (+ OR -)	S		E	P	R	L	D	I/M	TOTAL	STATUS (+ OR -)	S
Impact on heritage resources	Impact on heritage resources during general maintenance	1	1	4	4	4	4	56	-	High impact	** development of chance find procedures to be included in the EMP **Implementation of mitigation measures such as buffering, documentation and excavations and request destruction permits from SAHRA	1	1	4	4	4	1	14	-	Low impact
Decommissioning Phase																				
Impact on heritage resources	Impact on heritage resources during rehabilitation work associated with decommissioning - grading trench filling etc	1	1	4	4	4	4	56	-	High impact	** development of chance find procedures to be included in the EMP **Implementation of mitigation measures such as buffering, documentation and excavations	1	1	4	4	4	1	14	-	Low impact

ENVIRONMENTAL PARAMETER	ISSUE / IMPACT / ENVIRONMENTAL EFFECT/ NATURE	ENVIRONMENTAL SIGNIFICANCE BEFORE MITIGATION									RECOMMENDED MITIGATION MEASURES	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION								
		E	P	R	L	D	I/ M	TOTAL	STATUS (+ OR -)	S		E	P	R	L	D	I/ M	TOTAL	STATUS (+ OR -)	S
												and request destruction permits from SAHRA								

The projected impact significance for the development on heritage resources is MEDIUM to HIGH before mitigation and management and will reduce MEDIUM to LOW. It will however only be able to accurately determine impacts based on field work as discussed in section 3 of this report.

5.1 Cumulative Impacts (CI)

This section evaluates the Umsombombvu PV Projects. The CI on heritage resources evaluated a 35-kilometer radius (**Figure 12**). It must further be noted that the evaluation is based on available heritage studies (**Table 4**) 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 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. And so will 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 has been as follows.

The analysis of the completed studies as listed in **Table 4**, took in to account the findings and recommendation of each of the seventeen evaluated HIA's. The cumulative impact on the cultural landscape was discounted as the HIA's, in most cases, did not address this and the Visual Impact Assessment covers such analysis in detail.

The overall findings of the 17 studies all concur that the area is characterised by numerous Stone Age findspots and archaeological resources. Many these concentrated around outcrops in a landscape where water, food and shelter came at a premium. The sites around the outcrops where in most cases given a medium to high heritage significance on a local scale and in the majority of the cases were recommended as being no-go areas or extensive mitigation is required.

This cumulative assessment has also not addressed the possible cumulative impacts on the heritage landscape. The evaluated studies have in most cases not addressed or quantified the possible impact on the cultural landscape.

Table 4 provides an analysis of the projected cumulative impact this project will add to impact on heritage resources.

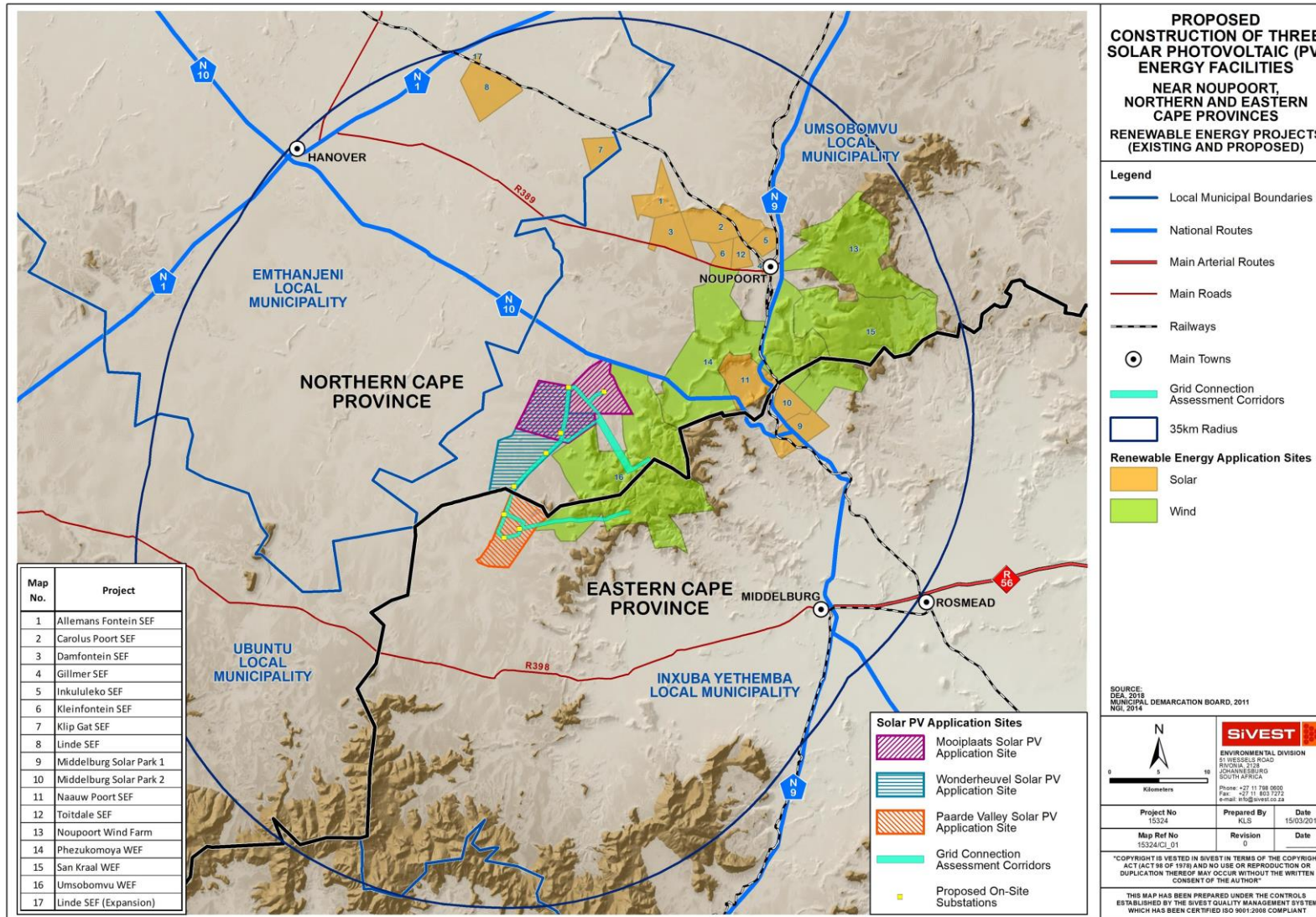


Figure 12: Other Renewable Energy developments in relation to the Umsobomvu PV Projects (SiVEST 2019)

Table 4: Heritage Impact Assessments conducted within 35km from the Umsombomvu PV Projects

Project	DEA Reference No	Findings	Recommendations
Allemans Fontein SEF	14/12/16/3/3/1/730	Surface scatters of middle stone age artefacts occurred over the extent of the area. Most were however disturbed and of low heritage value. No although the area was underlain by fossiliferous mudstone and sandstone no palaeontological significant finds were made.	General management measures such as informing SAHRA and chance finds procedure to be put in place.
Carolus Poort SEF	14/12/16/3/3/1/729	Surface scatters of middle stone age and later stone age artefacts occurred over the extent of the area. Most were however disturbed and of low heritage value. Although the area was underlain by fossiliferous mudstone and sandstone no palaeontological significant finds were made.	General management measures such as informing SAHRA and chance finds procedure to be put in place.
Damfontein SEF	14/12/16/3/3/1/728	Surface scatters of middle stone age and later stone age artefacts occurred over the extent of the area. Most were however disturbed and of low heritage value.	General management measures such as informing SAHRA and chance finds procedure to be put in place.
Gillmer SEF	14/12/16/3/3/1/735	Surface scatters of middle stone age and later stone age artefacts occurred over the extent of the area. One single collapsed stone structure was discovered. Most were however disturbed and of low heritage value. Although the area was underlain by fossiliferous mudstone and sandstone no palaeontological significant finds were made.	General management measures such as informing SAHRA and chance finds procedure to be put in place.
Inkululeko SEF	14/12/16/3/3/1/553	Surface scatters of middle stone age and later stone age artefacts occurred over the extent of the area.	General management measures such as informing SAHRA and chance finds procedure to be put in place.
Kleinfontein SEF	12/12/20/2/654	Surface scatters of middle stone age artefacts occurred over the extent of the area.	General management measures such as informing SAHRA and chance finds procedure to be put in place.
Klip Gat SEF	14/12/16/3/3/2/354	Surface scatters of middle stone age and later stone age artefacts occurred over the extent of the area. One single collapsed stone structure was discovered. One area of high significance was demarcated. Although the area was underlain by fossiliferous mudstone and sandstone no palaeontological significant finds were made.	General management measures such as informing SAHRA and chance finds procedure to be put in place. A detailed survey of the demarcated area was recommended.
Linde SEF	12/12/20/2/258	One site was identified with a cultural heritage resource, a stone redoubt emanating from the	General management measures such as informing SAHRA and

Project	DEA Reference No	Findings	Recommendations
		Second Boer War together with a portion of low gauge railway line. The resource has been excluded from the development footprint on site H, Taaibos.	chance finds procedure to be put in place. A detailed survey of the demarcated area was recommended. Buffering of the site was recommended.
Linde SEF (Expansion)	14/12/16/3/3/1/1122	One site was identified with a cultural heritage resource, a stone redoubt emanating from the Second Boer War together with a portion of low gauge railway line. The resource has been excluded from the development footprint on site H, Taaibos.	General management measures such as informing SAHRA and chance finds procedure to be put in place. A detailed survey of the demarcated area was recommended. Buffering of the site was recommended.
Middelburg Solar Park 1	12/12/20/2465/2	Surface scatters of middle stone age and later stone age artefacts occurred over the extent of the area. A few stone outcrops showed higher concentrations of lithics and required buffering.	General management measures such as informing SAHRA and chance finds procedure to be put in place. A detailed survey of the demarcated area was recommended. Buffering some sites were recommended.
Middelburg Solar Park 2	12/12/20/2465/1	Surface scatters of middle stone age and later stone age artefacts occurred over the extent of the area. A few stone outcrops showed higher concentrations of lithics and required buffering.	General management measures such as informing SAHRA and chance finds procedure to be put in place. A detailed survey of the demarcated area was recommended. Buffering some sites were recommended.
Naauw Poort SEF	14/12/16/3/3/2/355	Surface scatters of middle stone age and later stone age artefacts occurred over the extent of the area. A few dry pack stone walls were identified as having a medium heritage significance. One area of high significance was demarcated. Various fossil finds were made in the Katberg formation during field work.	General management measures such as informing SAHRA and chance finds procedure to be put in place. A detailed survey of the demarcated area was recommended. Further ground truthing of footprint areas were recommended.

Project	DEA Reference No	Findings	Recommendations
Toitdale SEF	12/12/20/2653	Surface scatters of middle stone age artefacts occurred over the extent of the area.	General management measures such as informing SAHRA and chance finds procedure to be put in place.
Noupoort Wind Farm	12/12/20/2319	A rock shelter with rock art was identified. Numerous dry stone walled enclosures were identified. A farmstead and cemetery was also identified during the fieldwork. Various fossil finds were made in the Katberg formation during field work.	General management measures such as informing SAHRA and chance finds procedure to be put in place. A detailed survey of the demarcated area was recommended. Further ground truthing of footprint areas were recommended
Phezukomoya WEF	14/12/16/3/3/1/1028	Stone Age archaeological sites are sparse in the high suurveld areas and that not very many sites will be physically impacted. Two archaeological sites will require mitigation through avoidance or alternatively systematic collection. Only a few fossil remains were recorded during a four-day field assessment	General management measures such as informing SAHRA and chance finds procedure to be put in place. A detailed survey of the demarcated area was recommended. Buffering some sites were recommended.
San Kraal WEF	14/12/16/3/3/1/1069	The comprehensive survey of the project area, associated infrastructure and power lines has revealed that Stone Age archaeological sites are sparse in the high suurveld areas and that not very many sites will be physically impacted. Fossil finds on site are confined to mostly fragmented river-washed bone fragments. The presence of a number of fossilised vertebrate burrows in a river bed was also noted	General management measures such as informing SAHRA and chance finds procedure to be put in place. A detailed survey of the demarcated area was recommended. Buffering some sites were recommended.
Umsobomvu WEF	14/12/16/3/3/2/730	A total of 41 heritage sites were noted in the study area from in the desktop and field survey. These sites varied from open stone tool scatters, rock art sites in small overhangs, and built structures such as farm buildings and kraals. The historical buildings were the most frequently occurring heritage sites. Three of these early farmsteads have associated cemeteries. There are no fatal flaws in the Umsobomvu WEF development proposal as far as fossil heritage is concerned.	General management measures such as informing SAHRA and chance finds procedure to be put in place. A detailed survey of the demarcated area was recommended. Buffering some sites were recommended.

As the projected impact on heritage resources is seen as the same on all the alternatives, a single impact rating table is provided (Table 5) for all three (3) proposed Solar PV Energy Facilities. The impact assessment rating is based on the rating scale as contained in **Appendix B** and **Appendix C**.

NOTE: After consideration of the proposed layout in relation to the heritage field work to be completed during the EIA phase, these tables will be developed for each of the alternatives.

Table 5: Impact rating – Cumulative Impacts for the Mooi Plaats, Wonderheuvel and Paarde Valley PV and grid options

ENVIRONMENTAL PARAMETER	ISSUE / IMPACT / ENVIRONMENTAL EFFECT/ NATURE	ENVIRONMENTAL SIGNIFICANCE BEFORE MITIGATION									RECOMMENDED MITIGATION MEASURES	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION								
		E	P	R	L	D	I/M	TOTAL	STATUS (+ OR -)	S		E	P	R	L	D	I/M	TOTAL	STATUS (+ OR -)	S
Cumulative																				
Impact on heritage resources	Additional impact of the development on heritage resources adding to the current cumulative impact of existing or proposed developments in the region	2	2	4	4	4	2	32	-	Medium impact	** Assessment of designated foot print areas of the infrastructure **Implementation of mitigation measures such as buffering, documentation and excavations and request destruction permits from SAHRA	1	1	4	4	4	1	14	-	Low impact

ENVIRONMENTAL PARAMETER	ISSUE / IMPACT / ENVIRONMENTAL EFFECT/ NATURE	ENVIRONMENTAL SIGNIFICANCE BEFORE MITIGATION									RECOMMENDED MITIGATION MEASURES	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION								
		E	P	R	L	D	I/M	TOTAL	STATUS (+ OR -)	S		E	P	R	L	D	I/M	TOTAL	STATUS (+ OR -)	S
Impact on palaeontological resources – fossil heritage	Excavations and site clearance of the development will involve substantial excavations into the superficial sediment cover as well as locally into the underlying bedrock.	2	2	4	4	4	2	32	-	Medium impact	A palaeontologist must conduct a field visit after vegetation clearance. Fossil Excavation will need a SAHRA permit. If an excavation is impossible, the fossil and locality could be protected and the development moved	1	1	4	4	4	1	14	-	Low impact

At this stage the projected additional load on heritage resources will be MEDIUM and implementing mitigation measures will reduce to the cumulative impact to LOW. With a detailed and comprehensive regional dataset this rating could possibly be adjusted and more accurate.

5.2 Comparative Assessment of Layout Alternatives (Heritage)

Key

PREFERRED	The alternative will result in a low impact / reduce the impact
FAVOURABLE	The impact will be relatively insignificant
LEAST PREFERRED	The alternative will result in a high impact / increase the impact
NO PREFERENCE	The alternative will result in equal impacts

GRID CONNECTION INFRASTRUCTURE ALTERNATIVES (POWER LINE CORRIDORS AND ASSOCIATED SUBSTATIONS)	Preference	Reasons (incl. potential issues)
MOOI PLAATS SOLAR PV FACILITY:		
Grid Connection Option 1	NO PREFERENCE	The option to contain heritage sensitive landscape that will need evaluation if during the EIA phase to enable a final assessment
Grid Connection Option 2	NO PREFERENCE	The option to contain heritage sensitive landscape that will need evaluation if during the EIA phase to enable a final assessment
WONDERHEUVEL SOLAR PV FACILITY:		
Grid Connection Option 1	NO PREFERENCE	The option to contain heritage sensitive landscape that will need evaluation if during the EIA phase to enable a final assessment
Grid Connection Option 2	NO PREFERENCE	The option to contain heritage sensitive landscape that will need evaluation if during the EIA phase to enable a final assessment
PAARDE VALLEY SOLAR PV FACILITY:		
Grid Connection Option 1	NO PREFERENCE	The option to contain heritage sensitive landscape that will need evaluation if during the EIA phase to enable a final assessment
Grid Connection Option 2	NO PREFERENCE	The option to contain heritage sensitive landscape that will need evaluation if during the EIA phase to enable a final assessment

5.3 Comparative Assessment of Layout Alternatives (Palaeontology)

Key

PREFERRED	The alternative will result in a low impact / reduce the impact
FAVOURABLE	The impact will be relatively insignificant
LEAST PREFERRED	The alternative will result in a high impact / increase the impact
NO PREFERENCE	The alternative will result in equal impacts

GRID CONNECTION INFRASTRUCTURE ALTERNATIVES (POWER LINE CORRIDORS AND ASSOCIATED SUBSTATIONS)	Preference	Reasons (incl. potential issues)
MOOI PLAATS SOLAR PV FACILITY:		
Grid Connection Option 1	NO PREFERENCE	The option to contain heritage sensitive landscape that will need evaluation if during the EIA phase to enable a final assessment
Grid Connection Option 2	NO PREFERENCE	The option to contain heritage sensitive landscape that will need evaluation if during the EIA phase to enable a final assessment
WONDERHEUVEL SOLAR PV FACILITY:		
Grid Connection Option 1	NO PREFERENCE	The option to contain heritage sensitive landscape that will need evaluation if during the EIA phase to enable a final assessment
Grid Connection Option 2	NO PREFERENCE	The option to contain heritage sensitive landscape that will need evaluation if during the EIA phase to enable a final assessment
PAARDE VALLEY SOLAR PV FACILITY:		
Grid Connection Option 1	NO PREFERENCE	The option to contain heritage sensitive landscape that will need evaluation if during the EIA phase to enable a final assessment
Grid Connection Option 2	NO PREFERENCE	The option to contain heritage sensitive landscape that will need evaluation if during the EIA phase to enable a final assessment

6 CONCLUSIONS AND RECOMMENDATIONS

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

The Heritage Scoping Report has shown that the proposed Umsombomvu sites to be developed as PV Facilities may have heritage resources present on the property. This has been confirmed through archival research and evaluation of aerial photography of the sites.

The projected impact assessment indicates that unmitigated impacts during construction can be MEDIUM to HIGH but reduced to LOW with the implementation of management measures. Impacts during the operational and decommissioning phase is projected to be LOW with the implementation of management measures.

These findings provide the basis for the recommendation:

- further field truthing through an archaeological walk down and palaeontological study covering the site. The aim of this will be to compile a comprehensive database of heritage sites in the study areas, with the aim of developing a heritage management plan for inclusion in the Environmental Management Plan as derived from the EIA.

At this stage none of the OV and grid options for the 3 projects are preferred above the others.

It is my considered opinion, based on the current data available, that with the consideration of the position of heritage sensitivities during the layout design the project will have an acceptable low impact on heritage resources and can continue.

7 REFERENCES

Butler, E. 2019. Palaeontological Impact Assessment for the proposed Umsobomvu Solar PV Energy Facilities near Noupoort, Northern and Eastern Cape Provinces

Smith, R.M.H. 1995. Changing fluvial environments across the Permian-Triassic boundary in the Karoo Basin, South Africa and possible causes of tetrapod Extinctions. Palaeogeography, Palaeoclimatology, Palaeoecology 117, 81-104.

Smith, R., Botha, J. 2005. The recovery of terrestrial vertebrate diversity in the South African Karoo Basin after the end-Permian extinction. C.R. Palevol 4: 555-568.

Heritage Impact assessments for the following projects:

Project	DEA Reference No
Allemans Fontein SEF	14/12/16/3/3/1/730
Carolus Poort SEF	14/12/16/3/3/1/729

Project	DEA Reference No
Damfontein SEF	14/12/16/3/3/1/728
Gillmer SEF	14/12/16/3/3/1/735
Inkululeko SEF	14/12/16/3/3/1/553
Kleinfontein SEF	12/12/20/2654
Klip Gat SEF	14/12/16/3/3/2/354
Linde SEF	12/12/20/2258
Linde SEF (Expansion)	14/12/16/3/3/1/1122
Middelburg Solar Park 1	12/12/20/2465/2
Middelburg Solar Park 2	12/12/20/2465/1
Naauw Poort SEF	14/12/16/3/3/2/355
Toitdale SEF	12/12/20/2653
Noupoort Wind Farm	12/12/20/2319
Phezukomoya WEF	14/12/16/3/3/1/1028
San Kraal WEF	14/12/16/3/3/1/1069
Umsobomvu WEF	14/12/16/3/3/2/730

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 administrated by a local authority. Graves in the category located inside a formal cemetery administrated 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 Umsombombvu PV Projects 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 (EIA) METHODOLOGY

The Environmental Impact Assessment (EIA) Methodology assists in evaluating the overall effect of a proposed activity on the environment. Determining of the significance of an environmental impact on an environmental parameter is determined through a systematic analysis.

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 1.

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

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

- Planning;
- Construction;
- Operation; and
- 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.

The significance of Cumulative Impacts should also be rated (As per the Excel Spreadsheet Template).

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 possible mitigation of the impact. Impacts have been consolidated into one

(1) rating. In assessing the significance of each issue the following criteria (including an allocated point system) is used:

Table 6: Rating of impacts criteria

ENVIRONMENTAL PARAMETER		
A brief description of the environmental aspect likely to be affected by the proposed activity (e.g. Surface Water).		
ISSUE / IMPACT / ENVIRONMENTAL EFFECT / 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 (e.g. oil spill in surface water).		
EXTENT (E)		
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 (P)		
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 (R)		
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 (L)		
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 (D)		
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).
INTENSITY / MAGNITUDE (I / M)		
Describes the severity of an impact (i.e. whether the impact has the ability to alter the functionality or quality of a system permanently or temporarily).		
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.
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SIGNIFICANCE (S)

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:

Significance = (Extent + probability + reversibility + irreplaceability + duration) 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 Rating	Significance	Description
5 to 23	Negative Low impact		The anticipated impact will have negligible negative effects and will require little to no mitigation.
5 to 23	Positive Low impact		The anticipated impact will have minor positive effects.
24 to 42	Negative Medium impact		The anticipated impact will have moderate negative effects and will require moderate mitigation measures.
24 to 42	Positive Medium impact		The anticipated impact will have moderate positive effects.
43 to 61	Negative High impact		The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact.
43 to 61	Positive High impact		The anticipated impact will have significant positive effects.
62 to 80	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".
62 to 80	Positive Very high impact		The anticipated impact will have highly significant positive effects.

The table below is to be represented in the Impact Assessment section of the report. The excel spreadsheet template can be used to complete the Impact Assessment.

Table 7: Rating of impacts template and example

ENVIRONMENTAL PARAMETER	ISSUE / IMPACT / ENVIRONMENTAL EFFECT / NATURE	ENVIRONMENTAL SIGNIFICANCE BEFORE MITIGATION									RECOMMENDED MITIGATION MEASURES	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION								
		E	P	R	L	D	I / M	TOTAL	STATUS (+ OR -)	S		E	P	R	L	D	I / M	TOTAL	STATUS (+ OR -)	S
Construction Phase																				
Vegetation and protected plant species	Vegetation clearing for access roads, turbines and their service areas and other infrastructure will impact on vegetation and protected plant species.	2	4	2	2	3	3	39	-	Medium	Outline/explain the mitigation measures to be undertaken to ameliorate the impacts that are likely to arise from the proposed activity. These measures will be detailed in the EMPr.	2	4	2	1	3	2	24	-	Low



ENVIRONMENTAL PARAMETER	ISSUE / IMPACT / ENVIRONMENTAL EFFECT / NATURE	ENVIRONMENTAL SIGNIFICANCE BEFORE MITIGATION									RECOMMENDED MITIGATION MEASURES	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION								
		E	P	R	L	D	I / M	TOTAL	STATUS (+ OR -)	S		E	P	R	L	D	I / M	TOTAL	STATUS (+ OR -)	S
Operational Phase																				
Fauna	Fauna will be negatively affected by the operation of the wind farm due to the human disturbance, the presence of vehicles on the site and possibly by noise generated by the wind turbines as well.	2	3	2	1	4	3	36	-	Medium	Outline/explain the mitigation measures to be undertaken to ameliorate the impacts that are likely to arise from the proposed activity. These measures will be detailed in the EMPr.	2	2	2	1	4	2	22	-	Low
Decommissioning Phase																				



ENVIRONMENTAL PARAMETER	ISSUE / IMPACT / ENVIRONMENTAL EFFECT / NATURE	ENVIRONMENTAL SIGNIFICANCE BEFORE MITIGATION									RECOMMENDED MITIGATION MEASURES	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION								
		E	P	R	L	D	I / M	TOTAL	STATUS (+ OR -)	S		E	P	R	L	D	I / M	TOTAL	STATUS (+ OR -)	S
Fauna	Fauna will be negatively affected by the decommissioning of the wind farm due to the human disturbance, the presence and operation of vehicles and heavy machinery on the site and the noise generated.	2	3	2	1	2	3	30	-	Medium	Outline/explain the mitigation measures to be undertaken to ameliorate the impacts that are likely to arise from the proposed activity. These measures will be detailed in the EMPr.	2	2	2	1	2	2	18	-	Low
Cumulative																				
Broad-scale ecological processes	Transformation and presence of the facility will contribute to cumulative habitat loss and impacts	2	4	2	2	3	2	26	-	Medium	Outline/explain the mitigation measures to be undertaken to ameliorate the impacts that are	2	3	2	1	3	2	22	-	Low



ENVIRONMENTAL PARAMETER	ISSUE / IMPACT / ENVIRONMENTAL EFFECT / NATURE	ENVIRONMENTAL SIGNIFICANCE BEFORE MITIGATION								RECOMMENDED MITIGATION MEASURES	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION								
		E	P	R	L	D	I / M	TOTAL	STATUS (+ OR -)		S	E	P	R	L	D	I / M	TOTAL	STATUS (+ OR -)
	on broad-scale ecological processes such as fragmentation.										likely to arise from the proposed activity. These measures will be detailed in the EMPr.								



Appendix D

Project team CV's

WOUTER FOURIE

Professional Heritage Specialist and Professional Archaeologist and Director PGS Heritage

Summary of Experience

Specialised expertise in Archaeological Mitigation and excavations, Cultural Resource Management and Heritage Impact Assessment Management, Archaeology, Anthropology, Applicable survey methods, Fieldwork and project management, Geographic Information Systems, including *inter alia* -

Involvement in various grave relocation projects (some of which relocated up to 1000 graves) and grave “rescue” excavations in the various provinces of South Africa

Involvement with various Heritage Impact Assessments, within South Africa, including -

- Archaeological Walkdowns for various projects
- Phase 2 Heritage Impact Assessments and EMPs for various projects
- Heritage Impact Assessments for various projects
- Iron Age Mitigation Work for various projects, including archaeological excavations and monitoring
- Involvement with various Heritage Impact Assessments, outside South Africa, including -
- Archaeological Studies in Democratic Republic of Congo
- Heritage Impact Assessments in Mozambique, Botswana and DRC
- Grave Relocation project in DRC

Key Qualifications

BA [Hons] (Cum laude) - Archaeology and Geography - 1997

BA - Archaeology, Geography and Anthropology - 1996

Professional Archaeologist - Association of Southern African Professional Archaeologists (ASAPA) - Professional Member

Accredited Professional Heritage Specialist – Association of Professional Heritage Practitioners (APHP)

CRM Accreditation (ASAPA) -

Principal Investigator - Grave Relocations

Field Director – Iron Age

Field Supervisor – Colonial Period and Stone Age

Accredited with Amafa KZN

Key Work Experience

2003- current - Director – PGS Heritage (Pty) Ltd

2007 – 2008 - Project Manager – Matakoma-ARM, Heritage Contracts Unit, University of the Witwatersrand

2005-2007 - Director – Matakoma Heritage Consultants (Pty) Ltd

2000-2004 - CEO– Matakoma Consultants

1998-2000 - Environmental Coordinator – Randfontein Estates Limited. Randfontein, Gauteng

1997-1998 - Environmental Officer – Department of Minerals and Energy. Johannesburg, Gauteng

Worked on various heritage projects in the SADC region including, Botswana, Malawi, Mozambique, Mauritius and the Democratic Republic of the Congo

CURRICULUM VITAE: ELIZE BUTLER

PROFESSION: Palaeontologist
YEARS' EXPERIENCE: 25 years in Palaeontology

EDUCATION: B.Sc Botany and Zoology, 1988
 University of the Orange Free State

B.Sc (Hons) Zoology, 1991
 University of the Orange Free State

Management Course, 1991
 University of the Orange Free State

M. Sc. *Cum laude* (Zoology), 2009
 University of the Free State

Dissertation title: The postcranial skeleton of the Early Triassic non-mammalian Cynodont *Galesaurus planiceps*: implications for biology and lifestyle

Registered as a PhD fellow at the Zoology Department of the UFS 2013 to current

Dissertation title: A new gorgonopsian from the uppermost *Daptocephalus Assemblage Zone*, in the Karoo Basin of South Africa

MEMBERSHIP

Palaeontological Society of South Africa (PSSA) 2006-currently

EMPLOYMENT HISTORY

Part time Laboratory assistant	Department of Zoology & Entomology University of the Free State Zoology 1989-1992
Part time laboratory assistant	Department of Virology University of the Free State Zoology 1992
Research Assistant	National Museum, Bloemfontein 1993 – 1997
Principal Research Assistant	National Museum, Bloemfontein

TECHNICAL REPORTS

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Butler, E. 2018 Palaeontological Desktop Assessment for the development of the proposed Leslie 1 Mining Project near Leandra, Mpumalanga Province.

Butler, E. 2017. Palaeontological Scoping Report for the Proposed Construction of a Warehouse and Associated Infrastructure at Perseverance in Port Elizabeth, Eastern Cape Province.

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Butler, E. 2017. Palaeontological Impact Assessment of the proposed consolidation of the proposed Ilima Colliery in the Albert Luthuli local municipality, Gert Sibande District Municipality, Mpumalanga Province.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed development of the H2 Energy Power Station and associated infrastructure on Portions 21; 22 And 23 of the farm

Hartebeestspruit in the Thembisile Hani Local Municipality, Nkangala District near Kwamhlanga, Mpumalanga Province.

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Butler, E. 2017. Palaeontological Impact Assessment of the proposed upgrade of the 132kv and 11kv power line into a dual circuit above ground power line feeding into the Urania substation in Welkom, Free State Province.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed diamonds alluvial & diamonds general prospecting right application near Christiana on the remaining extent of portion 1 of the farm Kaffraria 314, registration division HO, North West Province.

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Appendix E

Palaeontological Impact Assessment