

HERITAGE IMPACT ASSESSMENT

Environmental Impact Assessment for the Proposed Development of a 75 MW Solar Photovoltaic Facility (Gemsbok Solar PV6) on Gemsbok Bult 120/8, northeast of Kenhardt, Northern Cape Province

Required under Section 38 (8) of the National Heritage Resources Act (No. 25 of 1999).

Report for:

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8 February 2016

EXECUTIVE SUMMARY

ASHA Consulting (Pty) Ltd was appointed by the Council for Scientific and Industrial Research (CSIR) to conduct an assessment of the potential impacts to heritage resources that might occur through the proposed construction, operation and decommissioning of the 75 Megawatt (MW) Gemsbok Solar PV6 solar energy facility on Portion 8 of the farm Gemsbok Bult 120, near Kenhardt, Northern Cape. A 132 kV transmission line will link the facility with the Nieuwehoop Substation presently under construction on Gemsbok Bult 120/3.

A field survey of the preferred site, the alternative sites and the transmission corridors revealed archaeological material to be very thinly scattered throughout. However, more significant artefacts scatters were located around pans and rocky outcrops. The scatters are of low-medium significance and all are likely to be easily avoided.

There will also be impacts to the cultural landscape, but these would be of low significance. Mitigation would serve to slightly reduce the contrast of the built elements in the landscape.

There are no fatal flaws and overall the heritage impacts are considered to be of low significance for all phases. Mitigation would reduce the significance of impacts to archaeology and graves to very low, while impacts to the landscape will remain of low significance. Cumulative impacts to archaeology are insignificant because no important heritage sites would be lost during implementation of the proposed development. The clustering of this development with the many others proposed in the area means that the cumulative impacts to the landscape are considered to be acceptable and of low significance.

Because the potential impacts are quite limited and fairly easily avoidable it is recommended that the proposed Gemsbok PV6 facility and its associated transmission lines be authorised subject to the following conditions:

- Should it not be possible to avoid the significant archaeological sites with a minimum buffer of 20 m from the waypoints, then they should be excavated;
- The possible grave should be avoided with a buffer of at least 5 m or else tested and, if necessary, exhumed prior to construction with approval from SAHRA;
- The construction team should be made aware of the potential to locate graves and be instructed to report any suspicious stone features to SAHRA prior to disturbance;
- Where technically feasible, the built elements of the facility should be painted in an earthy colour to minimise visual contrast in the landscape; and
- If any archaeological material or human burials are uncovered during the course of construction then work in the immediate area should be halted. The find would need to be reported to SAHRA and may require inspection by an archaeologist. Such a heritage resource is the property of the state and may require excavation and curation in an approved institution.

Glossary

Background scatter: Artefacts whose spatial position is conditioned more by natural forces than by human agency

Early Stone Age: Period of the Stone Age extending approximately between 2 million and 200 000 years ago.

Hand-axe: A bifacially flaked, pointed stone tool type typical of the Early Stone Age.

Holocene: The geological period spanning the last approximately 10-12 000 years.

Later Stone Age: Period of the Stone Age extending over the last approximately 20 000 years.

Middle Stone Age: Period of the Stone Age extending approximately between 200 000 and 20 000 years ago.

Pleistocene: The geological period beginning approximately 2.5 million years ago and preceding the Holocene.

Abbreviations

ASAPA: Association of Southern African Professional Archaeologists

CCS: Crypto-crystalline silica

CRM: Cultural Resources Management

CSIR: Council for Scientific and Industrial Research

EA: Environmental Authorisation

EIA: Environmental Impact Assessment

EMPr: Environmental Management Programme

ESA: Early Stone Age

GPS: global positioning system

HIA: Heritage Impact Assessment

***In situ*:** In its original location or context.

LSA: Later Stone Age

MSA: Middle Stone Age

NEMA: National Environmental Management Act (No. 107 of 1998)

NHRA: National Heritage Resources Act (No. 25) of 1999

NID: Notification of Intent to Develop

SAHRA: South African Heritage Resources Agency

SAHRIS: South African Heritage Resources Information System

COMPLIANCE WITH THE APPENDIX 6 OF THE 2014 EIA REGULATIONS

Requirements of Appendix 6 – GN R982	Addressed in the Specialist Report
1. (1) A specialist report prepared in terms of these Regulations must contain-	Section 1.5 & Appendix 1
a) details of-	
i. the specialist who prepared the report; and	
ii. the expertise of that specialist to compile a specialist report including a curriculum vitae;	
b) a declaration that the specialist is independent in a form as may be specified by the competent authority;	Section 1.6 & Appendix 2
c) an indication of the scope of, and the purpose for which, the report was prepared;	Section 1.4
d) the date and season of the site investigation and the relevance of the season to the outcome of the assessment;	Section 3.2
e) a description of the methodology adopted in preparing the report or carrying out the specialised process;	Section 3
f) the specific identified sensitivity of the site related to the activity and its associated structures and infrastructure;	Section 6.2
g) an identification of any areas to be avoided, including buffers;	Sections 7 & 11
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 11
i) a description of any assumptions made and any uncertainties or gaps in knowledge;	Section 3.5
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;	Sections 7 & 8
k) any mitigation measures for inclusion in the EMPr;	Section 11
l) any conditions for inclusion in the environmental authorisation;	Sections 11 & 13
m) any monitoring requirements for inclusion in the EMPr or environmental authorisation;	Section 11
n) a reasoned opinion-	Sections 12 & 13
i. as to whether the proposed activity or portions thereof should be authorised; and	
ii. if the opinion is that the proposed activity 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;	
o) a description of any consultation process that was undertaken during the course of preparing the specialist report;	Section 6.1
p) a summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	Section 6.1
q) any other information requested by the competent authority.	n/a

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1. INTRODUCTION

ASHA Consulting (Pty) Ltd was appointed by the Council for Scientific and Industrial Research (CSIR) to conduct an assessment of the potential impacts to heritage resources that might occur through the proposed construction, operation and decommissioning of the 75 Megawatt (MW) Gemsbok Solar PV6 solar energy facility on Portion 8 of farm Gemsbok Bult 120, near Kenhardt, Northern Cape. A 132 kV transmission line will link the facility with the Nieuwehoop Substation presently under construction on Portion 3 of Gemsbok Bult Farm 120.

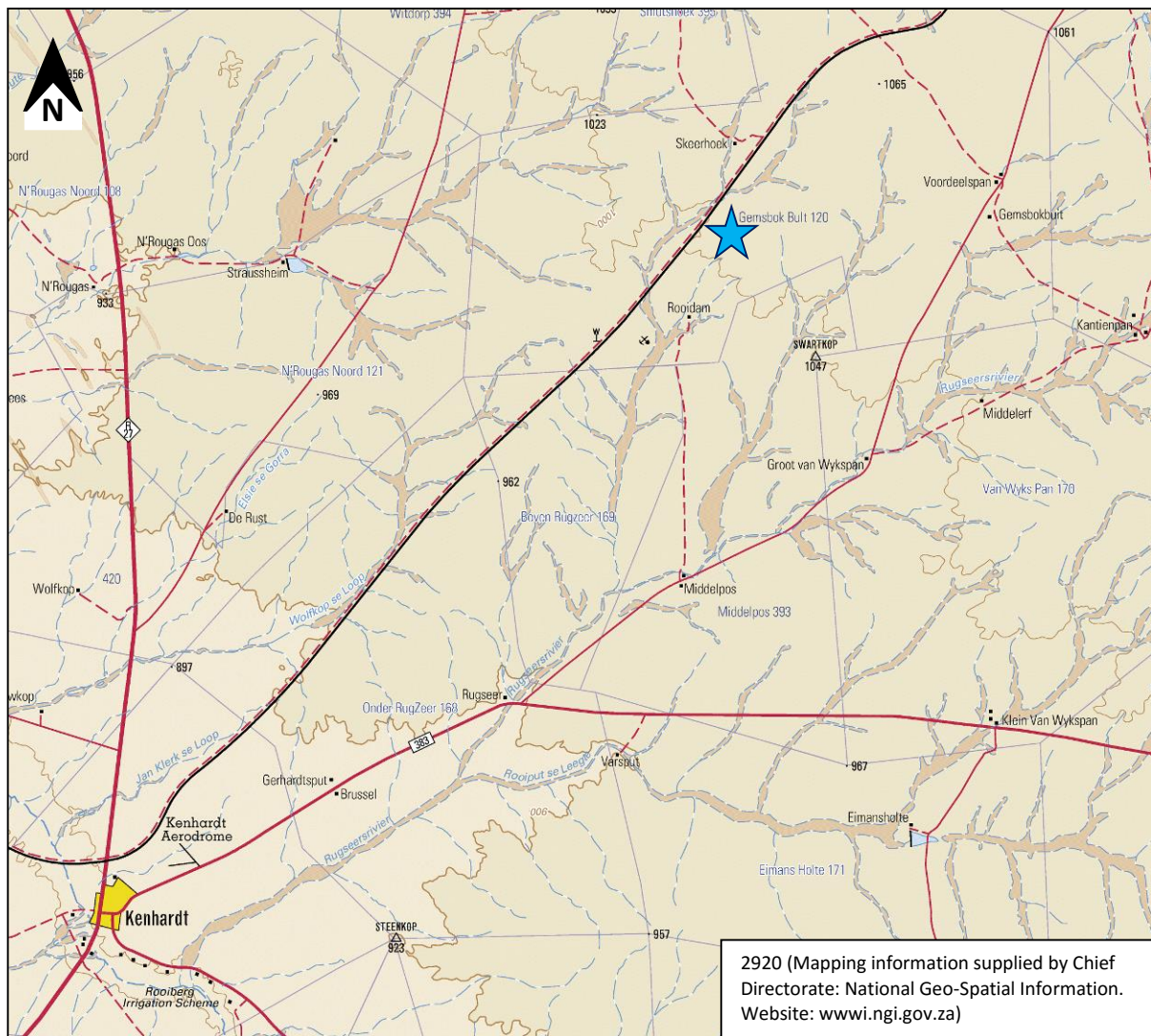


Figure 1: Map showing the location of the Gemsbok Solar PV6 site (blue star) along the Sishen-Saldanha railway line.

1.1. Project description

This project, referred to as Gemsbok Solar PV5, is one of seven solar projects being proposed on three neighbouring land parcels (Figure 2). It will entail construction of the following components:

- Solar Arrays:
 - CPV or PV Modules;
 - Single Axis Tracking structures (aligned north-south) and Fixed Axis Mounting structures (aligned east-west);
 - Solar module mounting structures comprised of galvanised steel and aluminium;
 - Foundations which will likely be drilled and concreted into the ground; and
 - Solar measuring station.
- Building Infrastructure:
 - Offices;
 - Operational and maintenance control centre;
 - Warehouse/workshop;
 - Ablution facility;
 - Converter station;
 - On-site substation building;
 - On-site workers accommodation camp; and
 - Guard House.
- Associated Infrastructure
 - 132 kV overhead transmission line;
 - On-site substation;
 - Additional feeder bay and Busbar at the Eskom Nieuwehoop Substation or extensions of the existing infrastructure;
 - A new 400/132kV transformer bay at the Eskom Nieuwehoop Substation;
 - 400/132kV Transformer at the Eskom Nieuwehoop Substation;
 - Extension of the 400kV busbar;
 - Extension of the 132kV Busbar;
 - 22/33 kV internal transmission lines/underground cables;
 - Access road;
 - Internal gravel roads;
 - Fencing;
 - Panel maintenance and cleaning area;
 - Stormwater channels;
 - Water pipelines; and
 - Temporary work area during the construction phase (i.e. laydown area).

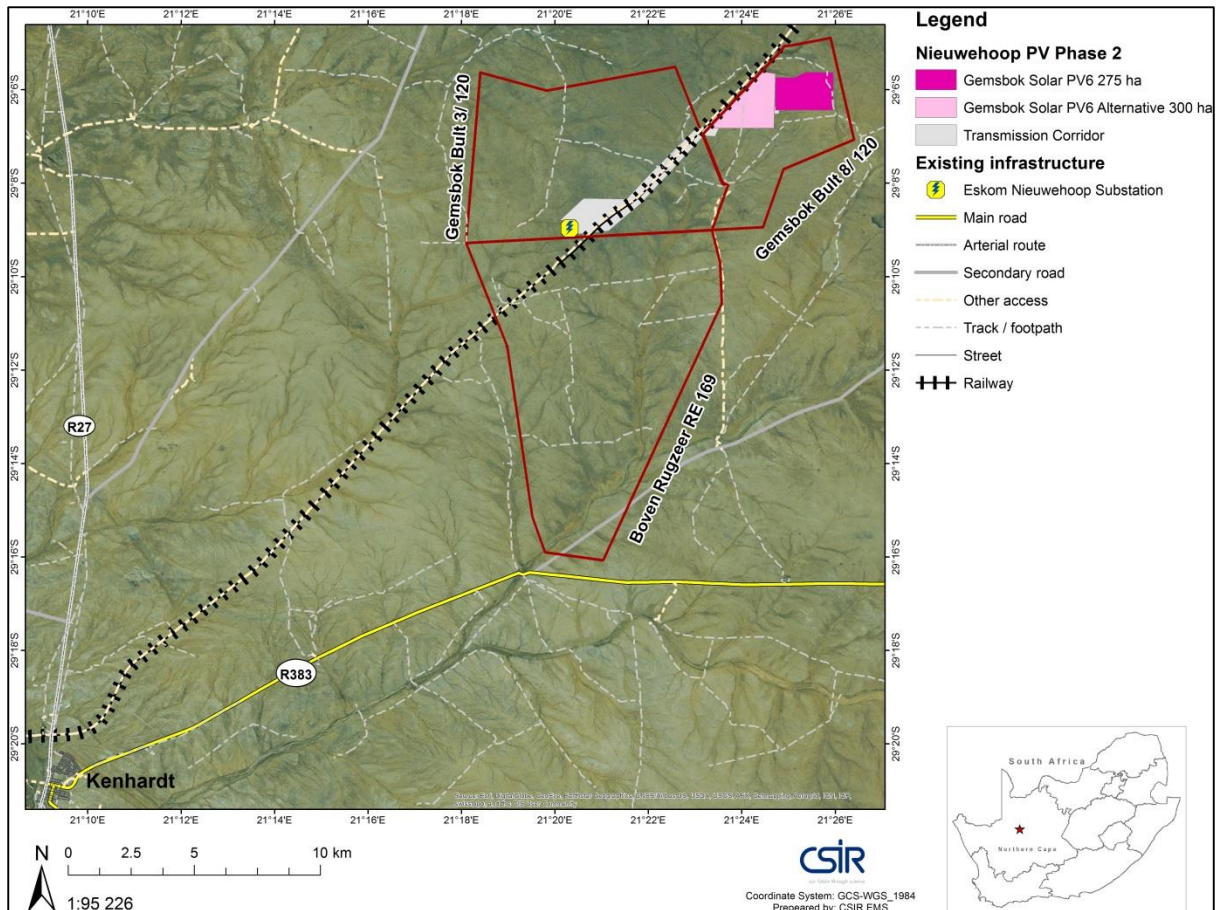


Figure 2: Map showing the location of the proposed Gemsbok Solar PV6 facility (dark pink) with the alternative project site (light pink) that were considered during the scoping phase.

1.2. Project aspects relevant to heritage impacts

Any aspect of the development as proposed might have a negative impact on heritage resources and thus the entire project is relevant to the heritage assessment. Aspects that disturb the ground (e.g. foundations, roads, trenches) may affect archaeology, palaeontology and graves, while all superstructure (e.g. solar panels, buildings, fences) would introduce impacts to the cultural landscape.

1.3. Terms of reference

ASHA Consulting (Pty) Ltd was requested to conduct a field study and produce a heritage impact assessment (HIA) that would meet the requirements of the heritage authorities.

During the scoping phase the South African Heritage Resources Agency (SAHRA) was notified of the proposed development. They responded requesting an impact assessment that examined archaeology, palaeontology and other aspects of heritage as relevant.

The HIA was based on the following broad Terms of Reference:

- Prepare and undertake a desktop study on the fossil heritage, archaeology, and heritage sites within the proposed project area.
- Undertake a detailed field examination of the archaeological sites and heritage features within or in the region of the development area.
- Describe the type and location of known archaeological sites and in the study area, and characterize all heritage items that may be affected by the proposed project.
- Describe the baseline environment and determine the status quo in relation to the specialist study.
- Record sites of archaeological relevance (photos, maps, aerial or satellite images, GPS co-ordinates, and stratigraphic columns).
- Evaluate the potential for occurrence of archaeological features within the study area.
- Identify and rate potential direct, indirect and cumulative impacts of the proposed project on the archaeological heritage for the construction, operational and decommissioning phases of the project. Study the cumulative impacts of the project by considering the impacts of proposed solar facility, together with the impact of other similar or related projects in the area (or being proposed);
- A Heritage Impact Assessment (HIA) report will be produced detailing the findings of the impact assessment. The report will cover all aspects of heritage (including archaeology, graves, built environment and the cultural landscape) as required by the National Heritage Resources Act (No 25 of 1999) (NHRA); and
- Identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored (these measures should be included in the EMPr); and
- Provide input to the EMPr, including mitigation measures and monitoring requirements to ensure that the impacts on the archaeology are limited.

Note that fossil heritage (palaeontology) is excluded from the present report because it has been handled by a separate specialist.

1.4. Scope and objectives of the report

An HIA is a means of identifying any significant heritage resources before development begins so that these can be managed in such a way as to allow the development to proceed (if appropriate) without undue impacts to the fragile heritage of South Africa. This HIA report aims to fulfil the requirements of the heritage authorities such that a comment can be issued for consideration by the National Department of Environmental Affairs (DEA) who will review the Environmental Impact Assessment (EIA) and grant or refuse Environmental Authorisation (EA). The HIA report will outline any mitigation requirements that will need to be complied with from a heritage point of view and that should be included in the conditions of EA should this be granted.

1.5. The author

Dr Jayson Orton has an MA (UCT, 2004) and a D.Phil (Oxford, UK, 2013), both in archaeology, and has been conducting HIAs and archaeological specialist studies in the Western Cape and Northern Cape provinces of South Africa since 2004 (Please refer to the Curriculum Vitae included in Appendix 1). He has also conducted research on aspects of the

Later Stone Age in these provinces and published widely on the topic. He is accredited with the Association of Southern African Professional Archaeologists (ASAPA) Cultural Resources Management (CRM) section (Member #233) as follows:

- Principal Investigator: Stone Age, Shell Middens & Grave Relocation; and
- Field Director: Colonial Period & Rock Art.

1.6. Declaration of independence

ASHA Consulting (Pty) Ltd and its consultants have no financial or other interest in the proposed development and will derive no benefits other than fair remuneration for consulting services provided. A full declaration is provided in Appendix 2.

2. HERITAGE LEGISLATION

The NHRA protects a variety of heritage resources as follows:

- Section 34: structures older than 60 years;
- Section 35: palaeontological, prehistoric and historical material (including ruins) more than 100 years old;
- Section 36: graves and human remains older than 60 years and located outside of a formal cemetery administered by a local authority; and
- Section 37: public monuments and memorials.

Following Section 2, the definitions applicable to the above protections are as follow:

- Structures: “any building, works, device or other facility made by people and which is fixed to land, and includes any fixtures, fittings and equipment associated therewith”;
- Palaeontological material: “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”;
- Archaeological material: a) “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”; b) “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”; c) “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 respectively in sections 3, 4 and 6 of the Maritime Zones Act, 1994 (Act No. 15 of 1994), 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”; and d) “features, structures and artefacts associated with military history which are older than 75 years and the sites on which they are found”;

- Grave: “means a place of interment and includes the contents, headstone or other marker of such a place and any other structure on or associated with such place”; and
- Public monuments and memorials: “all monuments and memorials a) “erected on land belonging to any branch of central, provincial or local government, or on land belonging to any organisation funded by or established in terms of the legislation of such a branch of government”; or b) “which were paid for by public subscription, government funds, or a public-spirited or military organisation, and are on land belonging to any private individual.”

While landscapes with cultural significance do not have a dedicated Section in the NHRA, they are protected under the definition of the National Estate (Section 3). Section 3(2)(c) and (d) list “historical settlements and townscapes” and “landscapes and natural features of cultural significance” as part of the National Estate. Furthermore, Section 3(3) describes the reasons a place or object may have cultural heritage value; some of these speak directly to cultural landscapes.

Section 38 (2a) states that if there is reason to believe that heritage resources will be affected then an impact assessment report must be submitted. This report fulfils that requirement.

Under the National Environmental Management Act (No. 107 of 1998; NEMA), as amended, the project is subject to an EIA. Ngwao-Boswa Ya Kapa Bokoni (Heritage Northern Cape; for built environment and cultural landscapes) and SAHRA (for archaeology and palaeontology) are required to provide comment on the proposed project in order to facilitate final decision making by the DEA.

3. METHODS

3.1. Literature survey and information sources

A survey of available literature was carried out to assess the general heritage context into which the development would be set. This literature included published material, unpublished commercial reports and online material, including reports sourced from the South African Heritage Resources Information System (SAHRIS). The 1:250 000 map was sourced from the Chief Directorate: National Geo-Spatial Information.

3.2. Field survey

The fieldwork for all seven proposed projects was undertaken simultaneously. The Gemsbok PV5 study area and its alternative study area were surveyed on 01 and 02 November 2015. The site visit took place in winter, although in this dry area seasonality has no effect on the visibility of heritage resources – visibility was excellent. The survey sought to conduct a landscape survey where certain landscape features known to be more sensitive were located and searched. Transects through all areas of the site were carried out to ensure that consistent results were being obtained and that the survey methodology was reliable.

During the survey the positions of finds were recorded on a hand-held GPS receiver set to the WGS84 datum. Photographs were taken at times in order to capture representative samples of both the affected heritage and the landscape setting of the proposed development.

The survey was conducted by the author and Mr Matthew Shaw, an archaeology Masters student. Although both the preferred and alternative sites were surveyed, the present impact assessment report assesses only the preferred option.

3.3. Impact assessment

For consistency, the impact assessment was conducted through application of a scale supplied by the CSIR.

3.4. Grading

Section 7 of the NHRA provides for the grading of heritage resources into those of National (Grade 1), Provincial (Grade 2) and Local (Grade 3) significance. Grading is intended to allow for the identification of the appropriate level of management for any given heritage resource. Grade 1 and 2 resources are intended to be managed by the national and provincial heritage resources authorities, while Grade 3 resources would be managed by the relevant local planning authority. These bodies are responsible for grading, but anyone may make recommendations for grading.

It is intended that the various provincial authorities formulate a system for the further detailed grading of heritage resources of local significance but this is generally yet to happen. Heritage Western Cape (2012), however, uses a system in which resources of local significance are divided into Grade 3A, 3B and 3C. These approximately equate to high, medium and medium-low local significance, while sites of low or very low significance (and generally not requiring mitigation or other interventions) are referred to as ungradable. For convenience, the Heritage Western Cape system is employed here.

3.5. Assumptions and limitations

The study is carried out at the surface only and hence any completely buried archaeological sites will not be readily located. Similarly, it is not always possible to determine the depth of archaeological material visible at the surface. Given the nature of the surface geology with bedrock frequently protruding through the gravel, neither of these limitations is likely to have affected the outcome of the report.

With regards to cumulative impacts, various other solar energy facilities and electrical transmission lines have been proposed in the immediate area. A new substation is presently under construction on Portion 3 of Gemsbok Bult Farm 120, while three solar energy facilities have received EA, although it is unknown when/if they will be built. The full list of developments considered in the cumulative impact assessment can be found in Table 6.1 of Chapter 6 of the EIA Report.

4. PHYSICAL ENVIRONMENTAL CONTEXT

4.1. Site context

The preferred site is located in a remote area between 35 and 37.5 km northeast of Kenhardt. It is located approximately 1 km to the southeast of the Sishen-Saldanha Railway Line and its gravel service road. Although major power lines are not currently present in the area, a large substation is currently under construction just north of the site and the railway line – this is the Eskom Nieuwehoop Substation (Figure 3). Three other PV facilities have already been granted authorisation in close proximity to the substation setting a precedent for electrical development in the area. The land is otherwise generally undeveloped and used for small stock grazing. Farm tracks and fences criss-cross the general area and occasional wind pumps occur.

4.2. Site description

The broader study area is very flat with topography limited to a few low rises and a few rocky outcrops, the nearest outcrops being 700 m southwest of the Alternative site and 800 m southeast of the preferred site. Low surface outcrops of rock also occur in places. Ephemeral stream beds are present, but generally rare in this area, and are evident largely by the slightly denser vegetation occurring along their courses. A fairly large pan occurs within the transmission corridor but is somewhat atypical with vegetation growing in it (Figure 4). Several smaller pans occur in the area as well: one lies at the southern edge of the Alternative site, one lies in its centre and a third lies within the north-eastern corner of the Preferred site. Overall, the surface is flat, coated in sand and gravel and has very sparse vegetation (Figure 5).



Figure 3: View across the sandy area alongside the large pan in the transmission corridor. The vegetation growing in the pan is visible in the background.



Figure 4: View across the Alternative study area showing one of the typical gravel patches in the area.

5. CULTURAL HERITAGE CONTEXT

This section of the report contains the desktop study and establishes what is already known about heritage resources in the vicinity of the study area. What is found during the field survey may then be compared with what is already known in order to gain an improved understanding of the significance of the newly reported resources.

5.1. Archaeological aspects

Bushmanland is well known for the vast expanses of gravel that occur in places and which frequently contain stone artefacts in varying densities (Beaumont 1995). Such material is referred to as ‘background scatter’ and is invariably of very limited significance. At times, however, the scatter can become very dense and mitigation work is occasionally called for. The artefacts located in these contexts are largely Early Stone Age (ESA) and Middle Stone Age (MSA) and are not associated with any other archaeological materials – these would have long since decomposed and disappeared. Previous experience immediately east of the present site suggests that such dense accumulations of artefacts are unlikely to occur in this area.

Of potentially more significance, however, are Later Stone Age (LSA) sites which are commonly located along the margins of water features in Bushmanland. These features include both pans and ephemeral drainage lines. Such sites were identified to the east of the present study area in association with pans but artefact scatters associated with drainage lines were rare (Orton 2014a, 2014b, 2014c). The drainage lines on the present site, however, are more prominent and perhaps more likely to reveal LSA camp sites. These

sites would typically contain mostly stone artefacts, but fragments of ostrich eggshell (used as water containers and also as a food source) and pottery are also found at times, while bone is rare and likely confined to sites that are very recent. Similar LSA sites can also be found in association with rocky outcrops but none appear to occur within the present study area. Because of their positions along water courses and adjacent to rocky areas, such sites are often avoided by development proposals because of the need to avoid the relevant natural features. Despite the increased likelihood of locating archaeology along streams, Morris (2009) noted that a search along the banks of the Hartebeest River close to Kenhardt, where he expected elevated frequencies of archaeological material, revealed virtually nothing.

Another kind of archaeological site fairly commonly encountered in Bushmanland is small rock outcrops that have been quarried as a source of stone material for making stone tools. Several such occurrences were noted to the east where quartz outcrops were frequently flaked (Orton 2014a, 2014b, 2014c).

Rock engravings are known from the broader area (Louw Roux Bushmanland 2013). From the limited information available, these appear to be naturalistic images produced by the Bushmen. Geometric images, produced by the Khoekhoen, are not well known from the area (Orton 2013), although David Morris (pers. comm. 2015) has seen examples in the region. Painted art is also very rare but again, examples are known, particularly on large granite boulders.

5.2. Historical aspects

The Anglo-Boer War was fought across the Northern Cape, but information on the role of Kenhardt appears difficult to locate. The town was occupied by the Boers in late February 1900 after they convinced the magistrate that they had a large gun and would fire on the town if it did not surrender. They later surrendered to the British who occupied the town on 31st March 1900. By mid-1900 there were perhaps 100 Cape Rebels detained in a camp outside of Kenhardt (Grobler 2004). The British raised a local force known as the Border Scouts in Upington in May 1900. Many were mixed-race individuals, some local farmers, others Kalahari hunters, but all disliked the Boers. The scouts were responsible for a large area of the north-western Cape Colony centred on Upington and Kenhardt. They eventually numbered 786 by January 1901 and were under the command of Major John Birbeck (AngloBoerWar.com 2015; Rodgers 2011). At the beginning of 1902 there were 150 Border Scouts stationed at Kenhardt. Two boers, H.L. Jacobs and A.C. Jooste, were accused of treason and executed in the town on 24 July 1901 (Grobler 2004). A memorial stands there to their honour (Green Kalahari n.d.).

No major action appears to have taken place around Kenhardt, although the Boers are known to have attacked a patrol on 17th May 1901, while the British attacked a Boer position on 25th June 1901 (AngloBoerWar.com 2015).

5.3. Built environment

The built environment is sparsely represented in Bushmanland because the farms tend to be so large. The vast majority of structures appear to be quite recent in age (20th century) and are of very limited heritage significance. In any case, the development will not affect any buildings. Graves are also very rare. Some older farms may have small graveyards located close to their farm buildings but, again, these are highly unlikely to be included within the areas proposed for development. Unmarked pre-colonial graves can, in theory, be located anywhere, although they are generally more common in sandy areas where excavation of graves was easier and in more productive areas where population densities would have been higher. It is highly unlikely that pre-colonial graves would be encountered in the study area.

5.4. Other aspects

The cultural and natural landscape is also of concern. However, the cultural landscape is very poorly developed in this area with fences, water troughs and wind pumps being the primary features. The natural landscape lacks visually interesting and sensitive features. In addition, the proposed site is a long distance from any important roads (it is 11 km from the R27) and is highly unlikely to be visible to anyone other than local residents making use of the gravel road along the railway line. Solar PV facilities are not very tall and, if an earthy coloured paint is used for the buildings (where technically feasible), they can be almost invisible from as little as 1 km away.

6. IDENTIFICATION OF KEY ISSUES

6.1. Key Issues Identified During the Scoping Phase

Only one potentially significant heritage issue was identified during the scoping phase of this EIA process. This was:

- The potential damage to or destruction of Stone Age archaeological sites occurring in proximity to water courses and pans.

No formal consultation was carried out specifically for the purposes of the heritage impact assessment because all studies were covered by the PPP. The CSIR conducted a joint PPP for all seven proposed PV developments. The only heritage-related comment received was the formal comment from SAHRA requesting that an HIA, including studies of archaeology and palaeontology and other relevant heritage, be conducted. The present report is in fulfilment of their request, although it should be noted that another specialist is assessing palaeontological impacts.

6.2. Sensitivity of the site in relation to proposed activity

The site is sensitive for the many archaeological artefacts and sites on its surface that would be damaged or destroyed through construction related activities. These include site preparation and all works related to installation of the project components.

6.3. Identification of Potential Impacts

The potential impacts identified during the EIA assessment are:

6.3.1. Construction Phase

- Damage to or destruction of archaeological resources
- Impacts to the cultural and natural landscape

6.3.2. Operational Phase

- Impacts to the cultural and natural landscape

6.3.3. Decommissioning Phase

- Impacts to the cultural and natural landscape

6.3.4. Cumulative impacts

- Damage to or destruction of archaeological resources;
- Impacts to the cultural and natural landscape.

7. FINDINGS OF THE HERITAGE STUDY

This section describes the heritage resources recorded in the study area during the course of the project. All are archaeological in nature and comprise largely of Stone Age remains. Table 1 lists and describes the findings, while Figure 5 maps them. Further discussion of certain finds is presented below.

Table 1: List of archaeological resources found during the survey. Note that, even though the alternative site is not formally assessed here, the resources found are still listed for the record. Where the project number appears in brackets this indicates that the resource is close to but not actually within the footprint area. A number of hours under mitigation is the suggested time required to carry out mitigation excavations.

Project	Way-point	Co-ordinates	Description	Heritage significance	Suggested mitigation
Gemsbok PV6	241	S29 05 39.3 E21 25 52.5	LSA scatter of quartz, quartzite and CCS on the east side of a small pan.	Low-medium	Avoid with a buffer of at least 20 m or conduct archaeological

Project	Way-point	Co-ordinates	Description	Heritage significance	Suggested mitigation
					excavations to rescue artefacts and data (2 hours).
Gemsbok PV6 Alt. (Gemsbok PV6 Tx)	240	S29 06 23.1 E21 24 20.3	LSA scatter of quartz, ostrich eggshell and one bone fragment on the west side of a small pan.	Low	-
Gemsbok PV6 Alt.	779	S29 06 48.9 E21 23 51.9	Quartz and quartzite LSA scatter on the north side of a pan. It has been disturbed by aardvark burrowing but part is intact.	Low-medium	Avoid with a buffer of at least 20 m or conduct archaeological excavations to rescue artefacts and data (1 hours).
(Gemsbok PV6 Alt.)	780	S29 06 51.4 E21 23 49.9	Probable grave. A rectangular area of loosely packed rocks in a sandy area to the southwest of a pan. There are no other rocks in the area at all. There are some fragments of ostrich eggshell as well as some quartz and CCS artefacts around it and an old tin can also lies nearby.	High	Avoid with a buffer of at least 5 m or test excavate to check for human remains then make decision to avoid or exhume with required process.
Gemsbok PV6 Alt. Gemsbok PV6 Tx	773	S29 06 47.5 E21 23 27.2	Large LSA site on the eastern edge of a wide, shallow pan area. Contains quartz, quartzite, CCS, banded iron formation. Hammer stone/upper grindstone and another upper grindstone seen. A part of the site is heavily damaged by aardvark burrows but at least one third of the dense area is intact.	Low-medium	Avoid with a buffer of at least 20 m or conduct archaeological excavations to rescue artefacts and data (4 hours).
Gemsbok PV6 Alt. Gemsbok PV6 Tx	774	S29 06 47.2 E21 23 28.6	Dense LSA quartz scatter on edge of wide, shallow pan area but about 40 m further east than 773. Quartzite and hornfels also present.	Low-medium	Avoid with a buffer of at least 20 m or conduct archaeological excavations to rescue artefacts and data (4 hours).
Gemsbok PV6 Alt. Gemsbok PV6 Tx	775	S29 06 48.3 E21 23 26.9	Small LSA artefacts scatter of quartz and quartzite on the eastern edge of a wide, shallow pan area.	Low-medium	Avoid with a buffer of at least 20 m or conduct archaeological excavations to rescue artefacts and data (2 hours).
Gemsbok PV6 Alt. Gemsbok PV6 Tx	776	S29 06 48.8 E21 23 26.7	Small LSA artefacts scatter of quartz, quartzite and CCS on the eastern edge of a wide, shallow pan area.	Low-medium	Avoid with a buffer of at least 20 m or conduct archaeological excavations to rescue artefacts

Project	Way-point	Co-ordinates	Description	Heritage significance	Suggested mitigation
					and data (2 hours).
(Gemsbok PV6 Tx)	768	S29 07 03.9 E21 23 12.1	Dense quartz artefact scatter at the base of a rocky koppie.	Medium	Avoid or conduct archaeological excavations to rescue artefacts and data (8 hours).
(Gemsbok PV6 Tx)	769	S29 07 04.1 E21 23 12.8	Dense quartz artefact scatter at the base of a rocky koppie. Some quartzite also present. Two lightly ground patches on bedrock here.	Medium	Avoid or conduct archaeological excavations to rescue artefacts and data (8 hours).
(Gemsbok PV6 Tx)	770	S29 07 05.9 E21 23 13.7	Light quartz scatter and one lightly ground patch on bedrock at the base of the smaller rocky koppie. There appears to be light artefact scatter all around the small hill but no particular points of concentration.	Low	-
(Gemsbok PV6 Tx)	771	S29 07 04.8 E21 23 11.5	Dense quartz scatter on a terrace near the crest of the koppie. Just above it there is a possible rock gong (it rings nicely when struck).	Low-medium	Avoid or conduct archaeological excavations to rescue artefacts and data (2 hours).
(Gemsbok PV6 Tx)	772	S29 07 03.9 E21 23 11.2	A single lightly ground patch on bedrock. There is also some glass around here too.	Low	-

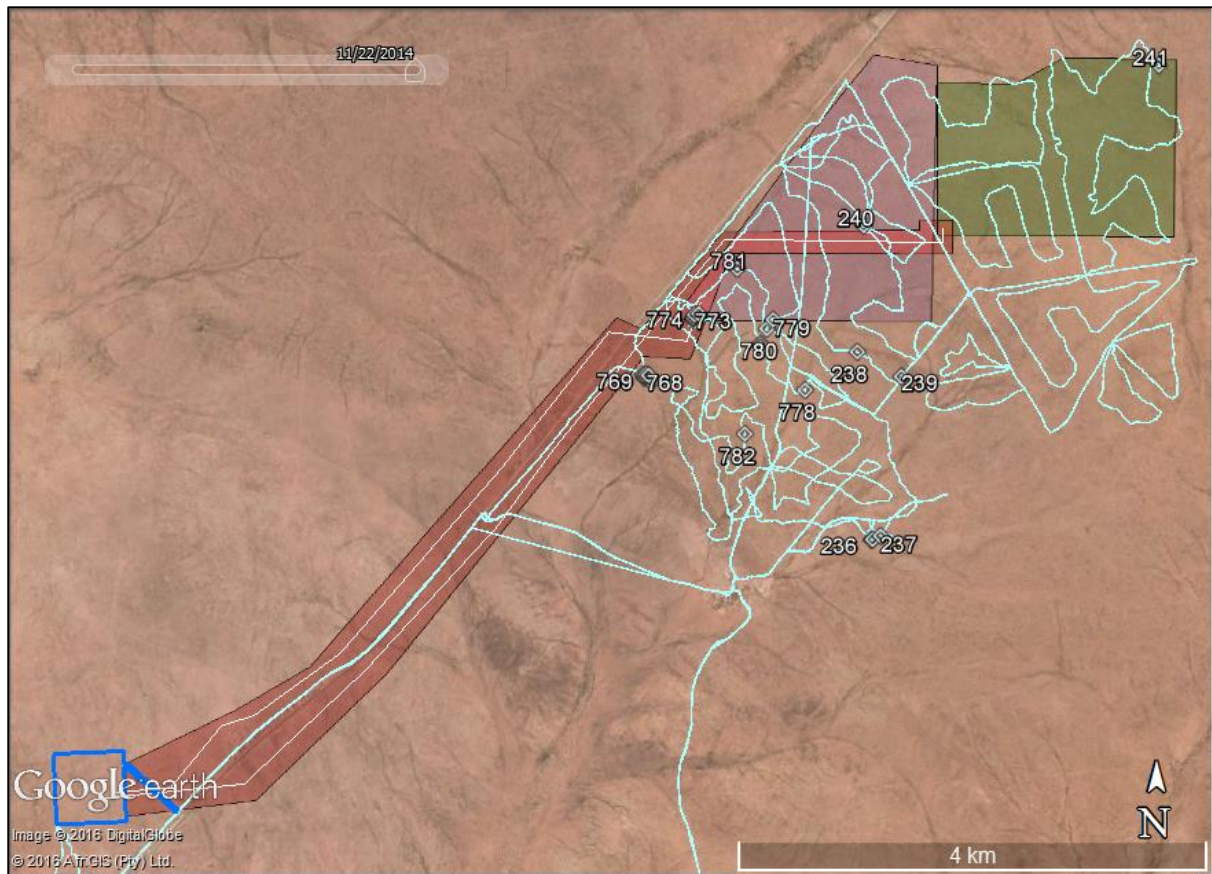


Figure 5: Aerial view of the study area showing the preferred site (green), transmission corridors (red) and alternative site (purple) with all finds superimposed. The Nieuwehoop Substation location is in blue in the southwest. The survey tracks are the thin light blue lines.

7.1. Archaeology

Archaeological material was found throughout the broader study area but in quite variable densities. The majority of the area contained only an extremely low density background scatter with occasional artefacts attributable to all three Stone Ages. Most archaeological material was located around the pan in the transmission corridor and the nearby rocky hill just outside the corridor, but one artefact scatter was found alongside a small pan within the preferred site. The survey showed that, with the exception of the pan in the northeast, water features were largely absent from the preferred site and this, along with the obvious rocky foci elsewhere, is likely the reason that so little was observed there.

Several LSA artefacts scatters with research potential were observed around the pans (e.g, Figure 6) and the rocky hill, while a scatter of larger ESA or MSA artefacts was found in the open close to a stone source (Figure 7).



Figure 6: LSA stone artefacts from the scatter alongside the pan at waypoint 771. On the left is a well used and presumably well-treasured hammer stone / upper grindstone. The scale is in cm.



Figure 7: ESA or MSA stone artefacts from the scatter at waypoint 781. The scale on the spine of the notebook is in cm.

7.2. Graves

No graves were recorded in the Preferred study area, but one possible grave was found just outside the southern margin of the Alternative site. It was a low mound of rocks in a gravel area (Figure 8).



Figure 8: Mound of stones though to be a grave at waypoint 238.

7.3. Cultural landscape

The cultural landscape in the area is fairly poorly developed with relatively little anthropogenic modification of the landscape being evident. What there is – farm tracks, wind pumps, reservoirs, fences – relates to a landscape of small stock farming but this has been compromised in the study area by the railway line and the new substation.

7.4. Statement of significance

Section 38(3)(b) of the NHRA requires an assessment of the significance of all heritage resources. In terms of Section 2(vi), “cultural significance” means aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance.

The majority of archaeological resources (and all those within the preferred site and transmission corridor) are deemed to have no more than low-medium cultural significance for their scientific value. The possible grave has high significance for its social value, while the cultural landscape has low cultural significance for its aesthetic and social values.

7.5. Summary of heritage indicators and provisional grading

The archaeological resources identified in the transmission corridor are considered to be grade 3C for their scientific value. The possible grave site is important because of the potential for human remains but its context suggests low-medium significance and a provisional grading of 3C to be appropriate for the site. Because of its low significance and the presence of other infrastructure within it, the landscape is also considered ungradable.

8. ASSESSMENT OF IMPACTS AND IDENTIFICATION OF MANAGEMENT ACTIONS

8.1. Damage to and Destruction of Archaeological Resources (Construction Phase)

It is anticipated that any archaeological sites located within the final development footprint of the PV facility would be physically damaged or, more likely, destroyed when the surface is levelled in preparation for construction. The chances of impacts through erection of the transmission lines are far smaller because of the very limited ground disturbance that would occur. All these impacts would be direct, negative impacts. The extent of the impacts would be site specific and their duration permanent. The consequence of the impacts is rated as moderate and the probability is very likely. The impacts are non-reversible and the resources cannot be replaced. Because the consequence of impacting the archaeological sites (alongside the pans at waypoints 773 to 776 and 241) found within the proposed transmission corridor and PV footprint is moderate, the significance of any potential impacts is likely to be low before mitigation. Mitigation would involve an archaeologist conducting excavations to rescue archaeological material from the relevant sites and, once this is complete, the significance of the potential impacts would be reduced to very low. Alternatively, the archaeological sites could be avoided with a minimum buffer of 20 m. Those in the transmission corridor are likely to be easily avoided.

8.2. Damage to and Destruction of Graves (Construction Phase)

It is anticipated that any graves located within the final development footprint would be physically damaged or, more likely, destroyed when the surface is levelled in preparation for construction. These impacts would be direct, negative impacts. The survey did not reveal any graves within the preferred development site but the chance still exists that one or more may be present. The extent of the impact would be site specific and its duration permanent. The consequence of the impact is rated as extreme and the probability is very unlikely. The impacts are non-reversible and the resource cannot be replaced. The consequence and probability combine to give an impact significance rated as low before mitigation. If any graves were found during construction then, if they cannot be protected and avoided, an archaeologist would need to exhume the grave with the permission of SAHRA. The only mitigation that can be suggested at present is to ensure that all works remain within the authorised footprint. This would reduce the significance of the impact to very low with mitigation.

8.3. Impacts to the Natural and Cultural Landscape (Construction, Operational and Decommissioning Phases)

The impact of the proposed project on the natural and cultural landscape is expected to occur during the construction, operational and decommissioning phases because of the presence of structures and equipment in the rural landscape. These impacts would be negative and direct, with a local spatial extent, and a long-term duration (for the lifetime of the facility). The consequence and probability of the impact are rated as moderate and very likely respectively and these combine to produce a potential impact of low significance. The

reversibility of the impact and irreplaceability of the resource are rated as high and moderate respectively. Solar panels are not as visible from a distance as the built aspects of the proposed development would be, but with the use of earthy-coloured paint on the buildings (where technically feasible), the degree of visual intrusion would be slightly reduced but the impact significance is still rated as being low.

During the operational phase, the addition of solar panels to the landscape will result in a marked change in its character from a rural landscape to one characterized by electrical infrastructure. Given that the precedent has already been set for electrical development, the significance of these potential impacts is considered to be low. No mitigation measures are recommended for the operational and decommissioning phases.

8.4. Cumulative Impacts to Archaeological Resources

The development of multiple solar energy facilities will result in many archaeological artefacts and sites being disturbed and/or destroyed over a wide area. Few of the sites recorded in the region have high cultural significance and it is likely that the vast majority of those that do would be protected from harm because of their proximity to water courses and pans. Cumulative impacts would be negative and direct in nature. They would occur at the local level and would be permanent. Because no sites of high archaeological significance were found within the present study area, the cumulative impact consequence is rated as moderate with the probability of impacts being likely. These combine to provide a significance rating of low for this project. The impacts are irreversible and the irreplaceability of archaeological resources is high. With mitigation the impact significance is reduced to very low.

8.5. Cumulative Impacts to Graves

The development of multiple solar energy facilities may result in a number of graves being disturbed and/or destroyed over a wide area. However, because graves can be very difficult to identify and many may well continue to exist beneath any developments, it is difficult to evaluate any cumulative impacts. The nature of graves as individual and generally isolated heritage resources is such that, although each is significant, the disturbance of multiple examples will not result in a significant cumulative impact. Cumulative impacts would be negative and direct and occur at the local level. They would be permanent in duration. The moderate consequence and very unlikely probability combine to give an impact significance rating of low before mitigation. After mitigation it is expected to be very low. The only mitigation that can be suggested at present is to ensure that all works remain within the authorised footprint. If graves were found during construction then they should either be protected and avoided or exhumed with the permission of SAHRA. The post-mitigation impact significance would be very low.

8.6. Cumulative Impacts to the Natural and Cultural Landscape

The development of multiple solar energy facilities will result in significant visual degradation of the local environment. However, it is also worth noting that it is far better, from the cumulative impact point of view, to cluster the facilities rather than to have them

spread out over the landscape. The present application is one of a number of applications for solar energy facilities in close proximity to the Nieuwehoop Substation and, because of this clustering, the cumulative impacts are more acceptable. The impacts would be direct and negative, occurring at the local level and with long term duration. The consequence is rated as moderate and, although the impact is very likely to occur, the significance of the impact is low. Although mitigation is suggested (i.e. use earthy-coloured paint on built elements where technically feasible), this will not have much effect overall, therefore the significance of the impact after mitigation is still rated as being low.

9. IMPACT ASSESSMENT SUMMARY

The assessment of potential impacts and recommendation of mitigation measures as discussed above are collated in Tables 2 to 5 below. Note that indirect impacts are not assessed because the nature of the identified heritage resources is such that significant indirect impacts are highly unlikely to occur.

Table 2: Impact assessment summary table for the Construction Phase.

Construction Phase													
Direct Impacts													
Aspect/ Impact Pathway	Nature of Potential Impact/ Risk	Status	Spatial Extent	Duration	Consequenc e	Probabilit y	Reversibilit y of Impact	Irreplac eability	Potential Mitigation Measures	Significance of Impact and Risk		Ranking of Residual Impact/ Risk	Confidence Level
										Without Mitigation/ Management	With Mitigation/ Management (Residual Impact/ Risk)		
Clearing of site	Destruction of archaeologi cal resources	Negative	Site	Permanen t	Moderate	Very likely	Non- reversible	High	Archaeological excavation to be undertaken by a professional archaeologist or avoid sites with a buffer of 20 m; Ensure all works occur inside approved development footprint.	Low	Very low	5	High
Clearing of site	Destruction of graves	Negative	Site	Permanen t	Extreme	Very unlikely	Non- reversible	High	Avoid grave with a buffer of at least 5 m or test and exhume as required	Low	Very low	5	Medium
Clearing of site and constructi on of the proposed facility	Impacts to the natural and cultural landscape	Negative	Local	Long term	Moderate	Very likely	High	Moderate	Use earthy-coloured paint on built elements where technically feasible	Low	Low	4	High

Table 3: Impact assessment summary table for the Operational Phase.

Operational Phase													
Direct Impacts													
Aspect/ Impact Pathway	Nature of Potential Impact/ Risk	Status	Spatial Extent	Duration	Consequenc e	Probabilit y	Reversibilit y of Impact	Irreplaceabilit y	Potential Mitigation Measures	Significance of Impact and Risk		Ranking of Residual Impact/ Risk	Confidence Level
										Without Mitigation/ Management	With Mitigation/ Management (Residual Impact/ Risk)		
The presence of the proposed PV facility	Impacts to the natural and cultural landscape	Negative	Local	Long term	Moderate	Very likely	High	Moderate	None required	Low	Low	4	High

Table 4: Impact assessment summary table for the Decommissioning Phase.

Decommissioning Phase													
Direct Impacts													
Aspect/ Impact Pathway	Nature of Potential Impact/ Risk	Status	Spatial Extent	Duration	Consequenc e	Probabilit y	Reversibilit y of Impact	Irreplaceabilit y	Potential Mitigation Measures	Significance of Impact and Risk		Ranking of Residual Impact/ Risk	Confidence Level
										Without Mitigation/ Management	With Mitigation/ Management (Residual Impact/ Risk)		
The presence of constructio n vehicles	Impacts to the natural and cultural landscape	Negative	Local	Short term	Moderate	Very likely	High	Moderate	None required	Low	Low	4	High

Table 5: Cumulative impact assessment summary table.

Cumulative Impacts													
Aspect/ Impact Pathway	Nature of Potential Impact/ Risk	Status	Spatial Extent	Duration	Consequenc e	Probabilit y	Reversibilit y of Impact	Irreplaceabilit y	Potential Mitigation Measures	Significance of Impact and Risk		Ranking of Residual Impact/ Risk	Confidence Level
										Without Mitigation/ Management	With Mitigation/ Management (Residual Impact/ Risk)		
Clearing of site	Destruction of archaeologica l resources	Negative	Local	Permanent	Moderate	Unlikely	Non- reversible	High	Archaeological excavation to be undertaken by a professional archaeologist	Low	Very low	5	High
Clearing of site	Destruction of graves	Negative	Local	Permanent	Moderate	Very unlikely	Non- reversible	High	Avoid grave with a buffer of at least 5 m or test and exhume as required	Low	Very low	5	Low
Clearing of site and constructio n of the proposed facility	Impacts to the natural and cultural landscape	Negative	Local	Long term	Moderate	Very likely	High	Moderate	Use earthy- coloured paint on built elements where technically feasible	Low	Low	4	High

10. PERMIT REQUIREMENTS

The NHRA does not require the developer to obtain permits prior to construction. However, any archaeological mitigation work (i.e. test excavations, sampling etc.) that may be required (in the event of archaeological resources or graves of significance being found within the development footprint during construction) would need to be conducted under a permit issued to, and in the name of, the appointed archaeologist. The permit application process allows the heritage authorities to ensure that a suitably qualified and experienced archaeologist undertakes the work and that the proposed excavation/sampling methodology is acceptable.

11. INPUT TO THE ENVIRONMENTAL MANAGEMENT PROGRAMME

11.1. For inclusion in the EMPr

It should be noted that the monitoring that may be suggested in an HIA and requested by the heritage authorities is different to that commonly enforced in the EIA context:

- For heritage purposes monitoring would be to check for previously undiscovered (and generally buried) heritage resources in areas where the probability remains high despite nothing being found during assessment; while
- In the EIA context, monitoring serves to ensure that authorisation conditions have been met. These requirements have been included in the EMPr document.

For heritage purposes then, and based on present information, no monitoring is required. Heritage mitigation requirements that should be incorporated into the EMPr are as follow:

- If the archaeological sites indicated in Figure 9 cannot be avoided (with a minimum buffer of 20 m) then provision should be made well in advance of the start of construction (preferably at least 6 months) for archaeological mitigation to be carried out. This will allow the archaeologist time to obtain a permit, conduct the work, analyse the material and obtain a positive comment from SAHRA. If the sites can be avoided then the Environmental Control Officer (ECO) should ensure that they are cordoned off and protected from harm.
- The ECO should meet with workers on site at the start of the construction phase to explain the possibility that previously unidentified graves might be present. The possible grave recorded during the survey could be pointed out as an example. During clearing of the surface, all personnel should be vigilant for any unusual stone features and these should be reported to the ECO, who should then report the find to an archaeologist. The find should be cordoned off and protected *in situ* until it can be evaluated by an archaeologist. Such a feature may need to be tested by an archaeologist to confirm whether they are graves or not. If they are graves then exhumation would be required prior to further work in the area.
- It should be ensured that all construction and operation activities take place within the authorised construction footprint so as to minimise damage to heritage resources that have not been mitigated;
- Where technically feasible, earthy-coloured paint should be used on the built elements of the project so as to reduce the visual contrast in the landscape.

11.2. For inclusion in the Environmental Authorisation

- Should it not be possible to avoid the significant archaeological sites with a minimum buffer of 20 m from the waypoints, then they should be excavated;
- The possible grave should be avoided with a buffer of at least 5 m or else tested and, if necessary, exhumed prior to construction with approval from SAHRA;
- The construction team should be made aware of the potential to locate graves and be instructed to report any suspicious stone features to SAHRA prior to disturbance;
- Where technically feasible, the built elements of the facility should be painted in an earthy colour to minimise visual contrast in the landscape; and
- If any archaeological material or human burials are uncovered during the course of construction then work in the immediate area should be halted. The find would need to be reported to SAHRA and may require inspection by an archaeologist. Such a heritage resource is the property of the state and may require excavation and curation in an approved institution.

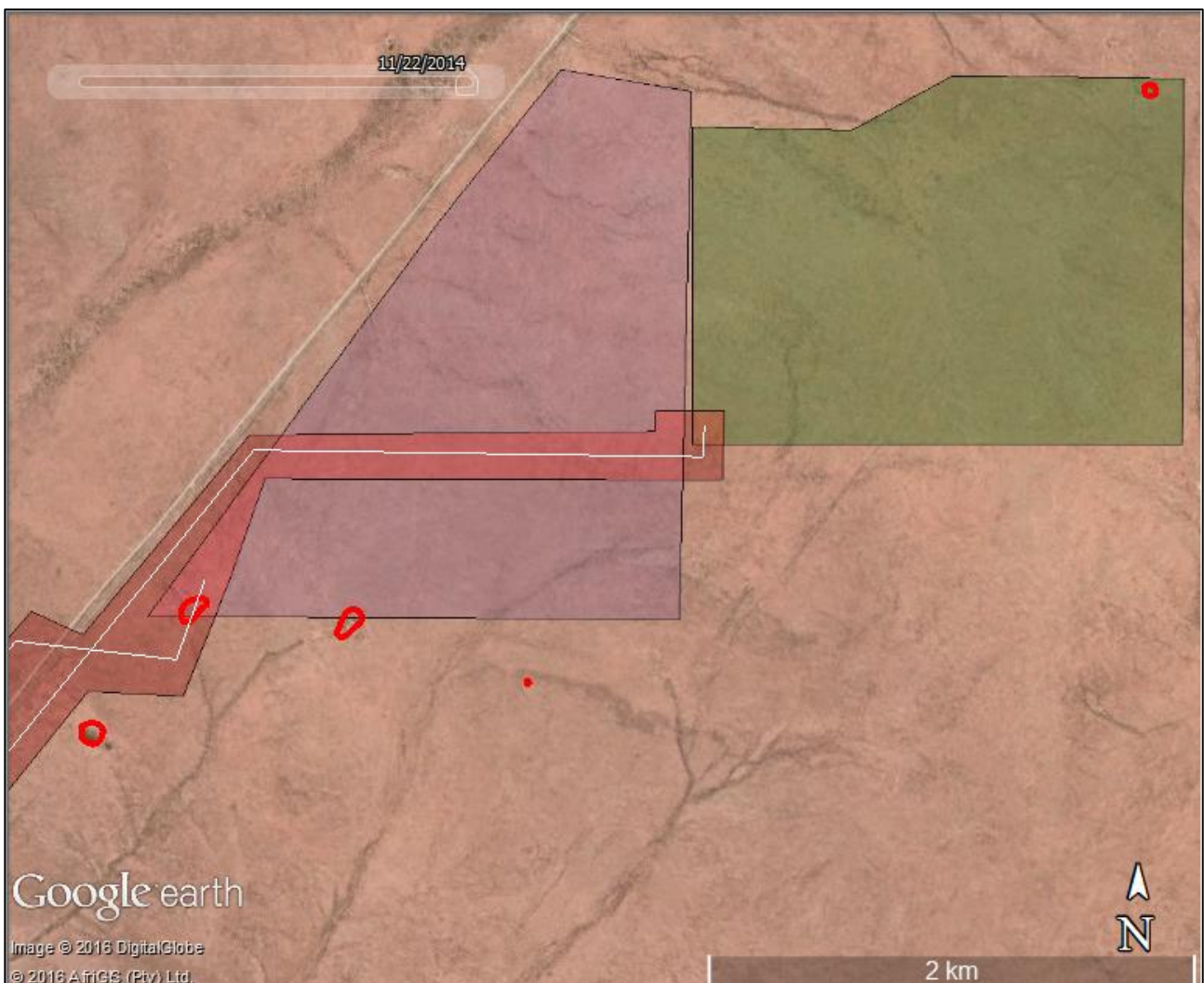


Figure 9: Aerial view of the preferred development site (green), alternative site (purple) and part of the transmission corridor (red) showing the locations of all the sensitive heritage sites (red outlines).

12. CONCLUSIONS

The Stone Age archaeological sites found in the transmission corridor and Preferred PV footprint area have low-medium significance and most should be easily avoided by the development. This makes the project area well-suited to development. Overall, impacts to heritage resources are of very low significance and will not influence the decision to proceed with the project. The development requires no heritage permits but if any archaeological mitigation becomes required then this would need to occur under a permit issued by SAHRA to the appointed archaeologist.

13. RECOMMENDATIONS

Because the potential impacts are quite limited and fairly easily avoidable it is recommended that the proposed Gemsbok PV6 facility and its associated transmission lines be authorised subject to the following conditions:

- Should it not be possible to avoid the significant archaeological sites with a minimum buffer of 20 m from the waypoints, then they should be excavated;
- The possible grave should be avoided with a buffer of at least 5 m or else tested and, if necessary, exhumed prior to construction with approval from SAHRA;
- The construction team should be made aware of the potential to locate graves and be instructed to report any suspicious stone features to SAHRA prior to disturbance;
- Where technically feasible, the built elements of the facility should be painted in an earthy colour to minimise visual contrast in the landscape; and
- If any archaeological material or human burials are uncovered during the course of construction then work in the immediate area should be halted. The find would need to be reported to SAHRA and may require inspection by an archaeologist. Such a heritage resource is the property of the state and may require excavation and curation in an approved institution.

14. REFERENCES

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APPENDIX 1 – Curriculum Vitae



Curriculum Vitae

Jayson David John Orton

ARCHAEOLOGIST AND HERITAGE CONSULTANT

Contact Details and personal information:

Address: 6A Scarborough Road, Muizenberg, 7945
Telephone: (021) 788 8425
Cell Phone: 083 272 3225
Email: jayson@asha-consulting.co.za

Birth date and place: 22 June 1976, Cape Town, South Africa
Citizenship: South African
ID no: 760622 522 4085
Driver's License: Code 08
Marital Status: Married to Carol Orton
Languages spoken: English and Afrikaans

Education:

SA College High School	Matric	1994
University of Cape Town	B.A. (Archaeology, Environmental & Geographical Science)	1997
University of Cape Town	B.A. (Honours) (Archaeology)*	1998
University of Cape Town	M.A. (Archaeology)	2004
University of Oxford	D.Phil. (Archaeology)	2013

*Frank Schweitzer memorial book prize for an outstanding student and the degree in the First Class.

Employment History:

Spatial Archaeology Research Unit, UCT	Research assistant	Jan 1996 – Dec 1998
Department of Archaeology, UCT	Field archaeologist	Jan 1998 – Dec 1998
UCT Archaeology Contracts Office	Field archaeologist	Jan 1999 – May 2004
UCT Archaeology Contracts Office	Heritage & archaeological consultant	Jun 2004 – May 2012
School of Archaeology, University of Oxford	Undergraduate Tutor	Oct 2008 – Dec 2008
ACO Associates cc	Associate, Heritage & archaeological consultant	Jan 2011 – Dec 2013
ASHA Consulting (Pty) Ltd	Director, Heritage & archaeological consultant	Jan 2014 –

Memberships and affiliations:

South African Archaeological Society Council member	2004 –
Assoc. Southern African Professional Archaeologists (ASAPA) member	2006 –
ASAPA Cultural Resources Management Section member	2007 –
UCT Department of Archaeology Research Associate	2013 –
Heritage Western Cape APM Committee member	2013 –
UNISA Department of Archaeology and Anthropology Research Fellow	2014 –
Fish Hoek Valley Historical Association	2014 –

Professional Accreditation:

ASAPA membership number: 233, CRM Section member

Principal Investigator: Coastal shell middens (awarded 2007)
Stone Age archaeology (awarded 2007)
Grave relocation (awarded 2014)

Field Director: Rock art (awarded 2007)
Colonial period archaeology (awarded 2007)

Fieldwork and project experience:

Extensive fieldwork as both Field Director and Principle Investigator throughout the Western and Northern Cape, and also in the western parts of the Free State and Eastern Cape as follows:

Phase 1 surveys and impact assessments:

- Project types
 - Notification of Intent to Develop applications (for Heritage Western Cape)
 - Heritage Impact Assessments (largely in the Environmental Impact Assessment or Basic Assessment context under NEMA and Section 38(8) of the NHRA, but also self-standing assessments under Section 38(1) of the NHRA)
 - Archaeological specialist studies
 - Phase 1 test excavations in historical and prehistoric sites
 - Archaeological research projects
- Development types
 - Mining and borrow pits
 - Roads (new and upgrades)
 - Residential, commercial and industrial development
 - Dams and pipe lines
 - Power lines and substations
 - Renewable energy facilities (wind energy, solar energy and hydro-electric facilities)

Phase 2 mitigation and research excavations:

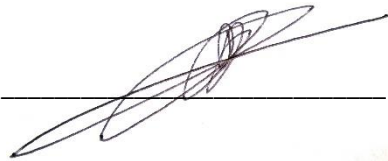
- ESA open sites
 - Duinefontein, Gouda
- MSA rock shelters
 - Fish Hoek, Yzerfontein, Cederberg, Namaqualand
- MSA open sites
 - Swartland, Bushmanland, Namaqualand
- LSA rock shelters
 - Cederberg, Namaqualand, Bushmanland
- LSA open sites (inland)
 - Swartland, Franschhoek, Namaqualand, Bushmanland
- LSA coastal shell middens
 - Melkbosstrand, Yzerfontein, Saldanha Bay, Paternoster, Dwarskersbos, Infanta, Knysna, Namaqualand
- LSA burials
 - Melkbosstrand, Saldanha Bay, Namaqualand, Knysna
- Historical sites
 - Franschhoek (farmstead and well), Waterfront (fort, dump and well), Noordhoek (cottage), variety of small excavations in central Cape Town and surrounding suburbs
- Historic burial grounds
 - Green Point (Prestwich Street), V&A Waterfront (Marina Residential), Paarl

APPENDIX 2 - Specialist Declaration

I, Jayson Orton, as the appointed independent specialist, in terms of the 2014 EIA Regulations, 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 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: _____



Name of Specialist: JAYSON ORTON

Date: 08 FEBRUARY 2016