



BIO THERM ENERGY (PTY) LTD

**SENDAWO PROJECTS - SUBSTATION AND
POWER LINE**

Heritage Scoping Report

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Author:	Wouter Fourie
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Executive Summary

PGS Heritage (Pty) Ltd (PGS) was appointed by SiVEST Environmental Division (SiVEST) to undertake a Heritage Scoping Report that forms part of the Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) for the proposed development of a 400kV powerline and substation for the Sendawo Solar Project near Vryburg, North West Province..

The Heritage Scoping Report has shown that the proposed Sendawo project powerline grid and substation may have heritage resources present on the property. This has been confirmed through archival research and evaluation of aerial photography of the sites.

Archaeological resources

Some rocky outcrops that could possibly contain rock engravings and open air stone age sites have been identified as possible heritage sensitive areas.

Historical resources

Power line corridor Alternative 1B intersects the Tiger Kloof Educational Institute just before the proposed alignment turns west. This provincial heritage site was established in 1904 after closing down of the Moffat Institute at Kuruman. The Institutes foot print covers a large portion of Alternative 1B and could possibly be a fatal flaw on this corridor alternative.

Palaeontological resources

The very high fossiliferous potential of the Boomplaas and Clearwater Formations, warrants an allocation of a Very High palaeontological sensitivity to the areas underlain by the rocks of the these formations. Areas underlain by calcrete are allocated a High palaeontological significance. All the areas underlain by Dolomite have a very high potential of containing cave breccias with highly sensitive fossil remains including remains of Hominin fossils. The breccias can be associated with areas underlain by calcretes as well.

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;
- Full Palaeontological Impact Assessment, the entails fieldwork and assessment of the potential impacts of the findings of such fieldwork;

SENDAWO (VRYBURG) POTENTIAL ISSUES

Alternative	Potential issues or fatal flaws
SUBSTATION SITE AND POWER LINE CORRIDOR	
Substation Site 1 and Corridor 1a	Palaeontological sensitivity – can be mitigated
Substation Site 1 and Corridor 1b	The Tiger Kloof Educational Institute is a provincial heritage site and covers a large portion of the Alternative

Alternative	Potential issues or fatal flaws
	1B corridor on the Waterloo farm. This can constitute this alignment as fatally flawed .
Substation Site 2 and Corridor 2	Palaeontological sensitivity – can be mitigated

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HERITAGE SCOPING REPORT

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1 INTRODUCTION

PGS Heritage (Pty) Ltd (PGS) was appointed by SiVEST Environmental Division (SiVEST) to undertake a Heritage Scoping Report that forms part of the Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) for the proposed development of a 400kV powerline and substation for the Sendawo Solar Project near Vryburg, North West Province.

1.1 Scope of the Study

The aim of the study is to identify possible heritage sites, finds and sensitive areas that may occur in the study area for the EIA study. The Heritage Impact Assessment (HA) aims to inform the Environmental Impact Assessment in the development of a comprehensive Environmental Management Plan 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 Specialist Qualifications

PGS Heritage (PGS) compiled this Heritage Scoping Report.

The staff at PGS has a combined experience of nearly 70 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, 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).

1.3 Assumptions and Limitations

The aim of the scoping document is to identify the possible types of heritage resources that might be present in the study area, as well as possible hotspots for the locality of such resources.

This report can in no way be seen as the final report and study phase for the EIA project and it assumes that a full ground truthing and survey will be conducted during the EIA phase of the project to identify heritage sites present in the impacted areas.

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:

- i. National Environmental Management Act (NEMA), Act 107 of 1998
- ii. National Heritage Resources Act (NHRA), Act 25 of 1999
- iii. 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.

- i. National Environmental Management Act (NEMA) Act 107 of 1998
 - a. Basic Environmental Assessment (BEA) – Section (23)(2)(d)
 - b. Environmental Scoping Report (ESR) – Section (29)(1)(d)
 - c. Environmental Impact Assessment (EIA) – Section (32)(2)(d)
 - d. Environmental Management Plan (EMP) – Section (34)(b)
- ii. National Heritage Resources Act (NHRA) Act 25 of 1999
 - a. Protection of Heritage Resources – Sections 34 to 36; and
 - b. Heritage Resources Management – Section 38
- iii. Mineral and Petroleum Resources Development Act (MPRDA) Act 28 of 2002
 - a. 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, and those developments administered through NEMA, and MPRDA legislation. In the latter cases, the feedback from the relevant heritage resources authority is required by the State and Provincial Departments managing these Acts before any authorizations are granted for development. The last few years have seen a significant change towards the inclusion of heritage assessments as a major component of Environmental Impacts Processes required by NEMA and MPRDA. This change requires us to evaluate the Sections of these Acts relevant to heritage (Fourie, 2008).

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

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

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

Table 1: Terminology

Acronyms	Description
AIA	Archaeological Impact Assessment
ASAPA	Association of South African Professional Archaeologists
CRM	Cultural Resource Management
DEA	Department of Environmental Affairs
DWS	Department of Water and Sanitation
EIA practitioner	Environmental Impact Assessment Practitioner
EIA	Environmental Impact Assessment
ESA	Early Stone Age
GPS	Global Positioning System
HIA	Heritage Impact Assessment
I&AP	Interested & Affected Party
LSA	Late 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

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

Early 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.

Late Stone Age

The archaeology of the last 20 000 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 20-300 000 years ago, associated with early modern humans.

Palaeontology

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

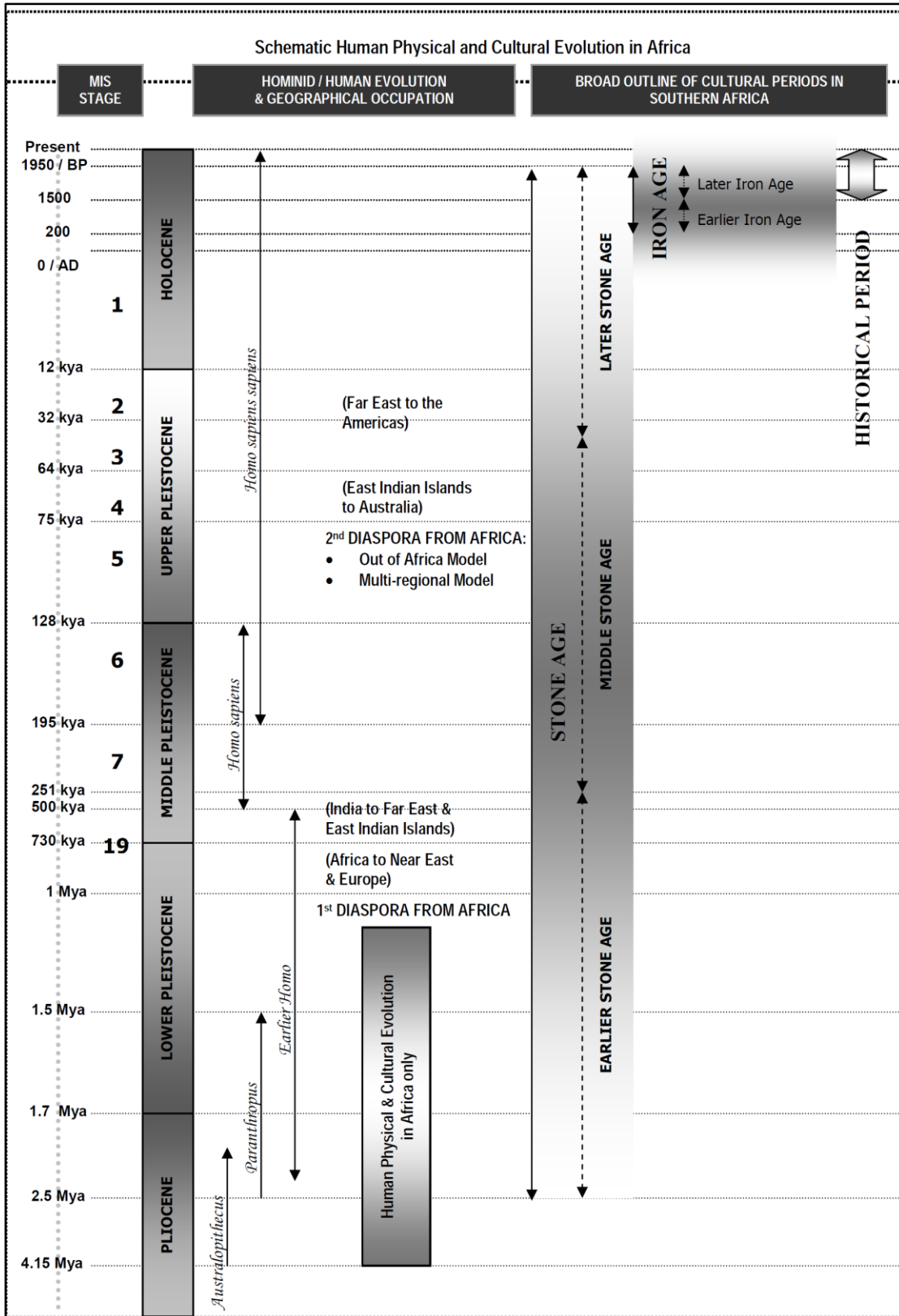


Figure 1 – Human and Cultural Timeline in Africa (Morris, 2008)

2 TECHNICAL DETAILS OF THE PROJECT

2.1 Site Location and Description

Sendawo Solar PV for which the proposed grid connection and substation is planned will be located approximately 10km south of Vryburg, in the Dr Ruth Segomotsi Mompati District of the North West Province. (Figure 2).

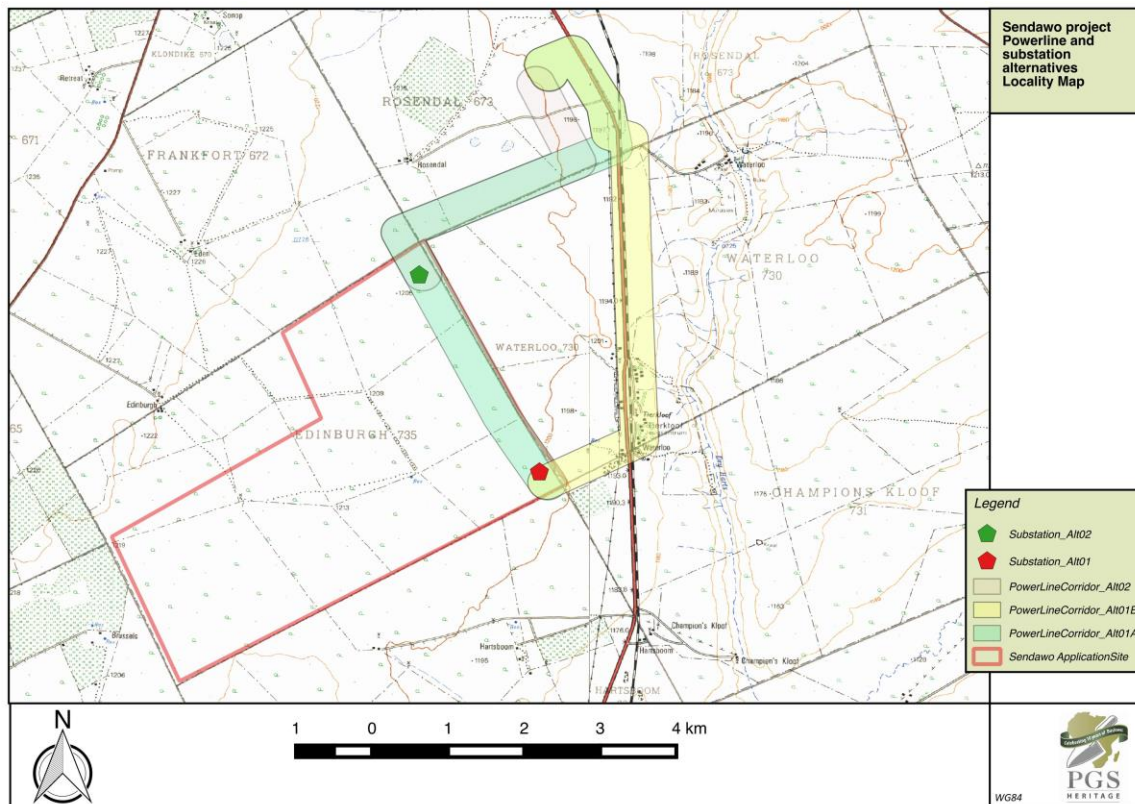


Figure 2 – Sendawo Solar Locality

Grid connection for the proposed Sendawo Solar PV facilities will be to the proposed Sendawo substation. The Sendawo substation will be connected to the existing Mookodi Main Transmission substation by a proposed 400kV power line. The Mookodi Main Transmission substation is located approximately 3km to the north-east of the application site.

3 ASSESSMENT METHODOLOGY

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

3.1 Methodology for Assessing Heritage Site significance

PGS compiled this Heritage Scoping Document as part of the Heritage Impact Assessment (HIA) report for the proposed Sendawo project powerline and substation. 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.

3.1.2 Impact Assessment Phase

Step II – Physical Survey: A physical survey was conducted on foot through the proposed project area by a qualified archaeologist, which 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, the assessment of resources in terms of the HIA criteria and report writing, as well as mapping and constructive recommendations.

Appendix B, outlines the Plan of study for the Heritage Impact Assessment process, 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 Archival findings

4.1.1 Overview of the archaeological fabric of the study area and surroundings

A small number of archaeological and heritage contract projects have been undertaken in the general surroundings of the study area. Of the three heritage studies located in this area, two were undertaken for proposed photovoltaic solar farms and one for an extension to an existing base metal mine. No purely academic archaeological research appears to have taken place in the direct vicinity of the study area, with the nearest known research locality the Taung Skull World Heritage Site situated 18.4 km south-east of the present study area. It is important to note that the information listed here does not necessarily represent all the previous archaeological work undertaken in the vicinity of the study area. The second source is information from reports that were accessed from the SAHRA electronic database known as SAHRIS, and which for the most part came about due to the requirement for archaeological and heritage impact assessments to be undertaken for mining (and other development) activities.

4.1.2 Archaeological Sites as Revealed Through a Study of Published Literature

The following sites were identified by studying archaeological journals and books. The sites are grouped according to their respective farm names. At the end of each description the approximate distance between the site and the present study area is provided. No information could however be obtained with regard to any archaeological research that was undertaken in close proximity to the study area. In the surrounding landscape the following archaeological sites are known:

Taung

In 1924 Raymond Dart identified the skull of an infant gracile australopithecine from a limestone quarry near Taung. While numerous fossils have been recovered from the same quarry, the skull of the Taung Child is the only hominin remains recovered from this site. Taung is one of only three localities in South Africa where fossil evidence for early hominins were ever recovered, the other two being the Cradle of Humankind (with sites such as Sterkfontein and Kromdraai) and Makapansgat (Mitchell, 2002). The Taung Skull World Heritage Site is located 70 km south of the present study area.

Harts River Valley Survey Project

In 1989 the University of the Witwatersrand was commissioned to conduct an archaeological survey of a section of the Harts River valley that was scheduled to be flooded by the proposed construction of the Taung Dam. A total of 28 Stone Age and three pastoralist sites were identified during the survey. Of the 38 identified Stone Age sites, a total of 11 could be associated with the Early Stone Age.

The best-preserved sites identified during the survey were excavated in 1992, including two of the Early Stone Age sites namely 2724DB3 and 2724DB4. Incidentally, the

research undertaken at these two sites has provided valuable insight into the Acheulean archaeology of South Africa. In the words of Prof. Kathleen Kuman (2001:20), the “...Harts Valley project provides further documentation for the South African part of this picture of technological continuity and the origins of prepared core technology within the Acheulean”.

Seven rock art sites were also identified in the footprint area of the proposed Taung Dam. These seven sites comprise finger paintings of geometric patterns as well as one site which contains paintings of “...riders on horseback...riders on horseback chasing an elephant...and two geometric patterns” (Dowson et.al., 1992:28).

If any of these sites identified before the construction of the Taung Dam still exists, they would be located roughly 60 km south east of the present study area.



Figure 3 – Tracing of one of the rock art panels at a site located roughly 40 km east of the present study area (Dowson, et.al., 1992: 29).

The aim of the archival background research is to identify possible heritage resources that could be encountered during the field work, as summarised in **Table 2**.

Table 2: Summary of History of Vryburg Town and Surrounding Area

DATE	DESCRIPTION
2.5 million to 250,000 years ago	<p>The Earlier Stone Age (ESA) is the first and oldest phase identified in South Africa's archaeological history and comprises two technological phases. The earliest of these technological phases is known as Oldowan which is associated with crude flakes and hammer stones and dates to approximately 2 million years ago. The second technological phase in the Earlier Stone Age of Southern Africa is known as the Acheulean and comprises more refined and better made stone artefacts such as the cleaver and bifacial handaxe. The Acheulean phase dates back to approximately 1.5 million years ago.</p> <p>A total of 11 Early Stone Age sites with Acheulean lithics have been recorded in the Harts River valley, immediately east of the town of Taung and roughly 60 km east of the present study area (Kuman, 2001).</p>
250,000 to 40,000 years ago	<p>The Middle Stone Age is the second oldest phase identified in South Africa's archaeological history. It is associated with flakes, points and blades manufactured by means of the prepared core technique.</p>
40,000 years ago to the historic past	<p>The Later Stone Age is the third phase in South Africa's Stone Age history. It is associated with an abundance of very small stone artefacts (microliths). The Later Stone Age is also associated with rock engravings and rock paintings.</p> <p>Rock engravings are known from the wider vicinity of the study area (Bergh, 1998), with one known site located at Dinkweneng (roughly 43 km east of the study area). Furthermore, a Low Density Surface Scatter of Later Stone Age material was identified at the Pering Mine (approximately 60 km south-west of the study area) (Birkholtz, 2011).</p>
Early 1600s	<p>The Tswana groups known as the Thlaping and Thlaro moved southward into the area presently known as the Northern Cape. A century later they were settled in areas as far south as Majeng (Langeberg), Tsantsabane (Postmasburg) and Tlhaka le Tlou (Daniëlskuil) (Snyman, 1986).</p>
c. 1770	<p>The Kora moved into the area. Due to their superior firearms they applied increasing pressure on the Thlaping and Thlaro groups. In the end the Thlaping moved into a north-eastern direction to settle in the general vicinity of Dithakong, north-east of present-day Kuruman. The Thlaro settled in areas to the west and north-west of the Thlaping (Snyman, 1986).</p>
c. 1795	<p>Legassick (2010) confirms the presence of the Thlaping, Thlaro and Kora in the general vicinity of the study area during this time.</p>
Early 1800s	<p>After the threat of the Kora became less intensive the Thlaping moved to the vicinity of present-day Kuruman. The Thlaro returned to the Langeberg, establishing them on a permanent basis there during the 1820s (Snyman,</p>

	1986). During this time German-born deserter Jan Bloem and his followers established themselves at Lekatlong (Legassick, 2010).
1833	Hurutshe refugees established themselves at Taungs (Legassick, 2010). The present-day town of Taung is roughly 40 km due-south of the study area.
1834	Mahura and his Thlaping followers moved from the vicinity of Kuruman to Taungs. Apart from the 1,500 individuals that followed Mahura to Taungs, the settlement of Taungs at the time also included some 2,000 Hurutshe, the Kora leader Mosweu Taaibosch and his followers as well as some 1,500 Maidu (Legassick, 2010).
November 1840	Gasibonwe, the son of Mothibi, attacked Mahura's cattle posts at Taungs and further afield. His aim was to degenerate Mahura's rule and to achieve supremacy over all the Thlaping (Legassick, 2010).
22 April 1842	A treaty was signed between Griqua leader Andries Waterboer and Thlaping leader Mahura at Mahura's settlement near Taungs. The agreement included a definition of the boundary between the two groups. The section of the agreed upon boundary closest to the study area ran from Daniëlskuil to Boetsap, which meant that the study area was defined as part of this treaty as forming part of Thlaping land (Legassick, 2010). This boundary was very similar to an earlier one that was thought to have been agreed to during the 1820s as a boundary between the Griqua and the Thlaping (Legassick, 2010).
1867	Diamonds were discovered for the first time in South Africa near Hopetown. Alluvial diamonds were also discovered along both banks of the Orange River in the vicinity of the confluence of the Vaal and Harts Rivers (Van Staden, 1983). This resulted in large numbers of fortune seekers streaming into the area from overseas, which would have had a profound impact on the social-dynamics of the landscape.
27 October 1871	The area located in the triangle formed by the Orange and Vaal Rivers was proclaimed as British Territory and named Griqualand West. This proclamation came as a result of ownership disputes between the Griqua, the Boer Republic of the Orange Free State and the Boer Republic of the Zuid-Afrikaansche Republiek in terms of the newly discovered diamond diggings (www.wikipedia.com).
1879	After Barend Barends was defeated by the Khumalo Ndebele of Mzilikazi, Boetsap was occupied by two shopkeepers, Hunter and Tasker.
1882-1885	The Boer Republic of Stellaland existed during this time in the general area of the Vryburg district. Stellaland had its roots in the conflict between Mankurwane's Thlaping and Mosweu's Kora over land. Both sides used white mercenaries who as part of their remuneration were to receive farms. Almost 300 Boers joined the side of Mosweu in this war and on 26 July 1882 Mankurwane sued for peace. As a result of the peace agreement a

	portion of land was set aside for the mercenaries. From September 1882 the capital of Stellaland was being laid out and named Vryburg. On 6 August 1883 the Republic of Stellaland was proclaimed. However, the republic ceased to exist when Sir Charles Warren proclaimed the Bechuanaland Protectorate on 30 September 1885 (Bergh, 1999). The Taungs area, including the farm Brakfontein, was located just outside the southern boundary of Stellaland.
30 September 1885	Sir Charles Warren proclaims British Bechuanaland. This proclaimed area included the study area (www.wikipedia.com).
1895	British Bechuanaland was incorporated into the Cape of Good Hope (www.wikipedia.com). The study area now fell within the Cape of Good Hope. In the same year the Kaukwe Native Reserve was established in accordance with British Bechuanaland Proclamation No. 220 (Breutz, 1986). This reserve is located 60km south-west of the present study area
1904	Reverend William Charles Willoughby and his wife Bessie arrives in the vicinity of the current study area with the aim of assisting the Batswana to establish a school in Bechuanaland. After several attempts the Institution was finally established at Tiger Kloof. http://www.tigerkloof.com/index.php/about-us/history

4.1.3 Findings of the back ground research

The pre-history of the area is evident through the presence of numerous farms with rock engravings, including Verdwaal Vlakte, Bernauw, Schatkist, Wonderfontein and Kinderdam (Van Schalkwyk, 2012; Morris, 1998).

The numerous dry pans in the northern section of the study area also increase the probability of finding Stone Age Sites associated with hunter gatherer subsistence.

Heritage Resources associated with the South African War can be traced through the presence of blockhouse lines between Taung and Vryburg and onwards towards Madibogo, as well as the Vryburg concentration camp situated on the Vryburg Allotment area that is now part of the Leon Taljaard Nature Reserve to the north west of Vryburg.

Other areas of significance identified are the Devondale Mission (*circa* pre-1900), Tiger Kloof Institute (*circa* 1904) as well as the farmstead of the first and only president, Gerrit Jacobus van Niekerk, of the republic of Stellaland on the farm Niekerksrus. some 36 kilometres northwest of Vryburg.

Themes identified during the research were:

- Palaeontology
- Pre-colonial archaeology and early inhabitants – especially associated with inland water in the arid regions of South Africa

- Early Colonial History and settlement
- Routes and transport
- Military history
- Town and village formation

4.2 Palaeontology

The palaeontological resources in the Vryburg area have received very little scientific attention. To a great extent they can only be inferred from the rock units represented there on geological maps. Most of the potentially fossiliferous superficial deposits (e.g. Caenozoic alluvium) are not shown on the published geological maps, however.

Sendawo Development Area is mainly underlain by Vaalian aged rocks of the Boomplaas and Clearwater Formations, Ghaap Group, Griqualand West Supergroup and Tertiary aged Calcretes and surface deposits.

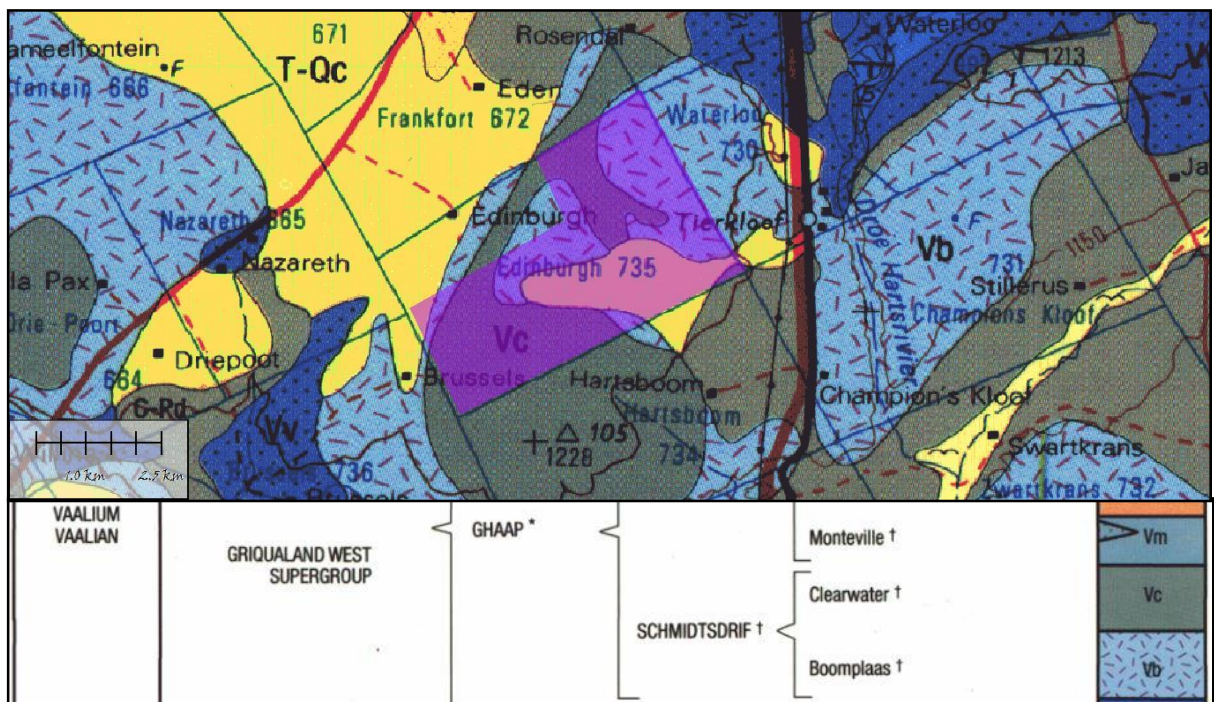


Figure 4 – The study area is underlain by rocks of the Boomplaas (Vb) and Clearwater (Vc) Formations of the Ghaap Group, and calcrete (T-Qc)

4.2.1 Findings from the studies

Through the analysis of the aerial photographs and available maps of the study the following possible heritage sensitivities were identified inside the study area.

Archaeological resources

Some rocky outcrops that could possibly contain rock engravings and open air stone age sites have been identified as possible heritage sensitive areas.

Historical resources

Power line corridor Alternative 1B intersect the Tiger Kloof Educational Institute just before the proposed alignment turns west. This provincial heritage site was established in 1904 after closing down of the Moffat Institute at Kuruman. The school acted as a High School, Teachers' Training College, Bible College and Trade School all rolled into one. However the school closed down in 1962. Large section of the school was then demolished, leaving a few buildings intact.

(https://en.wikipedia.org/wiki/Tiger_Kloof_Educational_Institute)

In the late 1980s the remaining building were declared a provincial heritage site. The Institute was again opened in 1995 and is today a flourishing educational institute providing primary as well as secondary school education.

Well known pupils of the school are:

Sir Seretse Khama, first president of Botswana, (student: 1935-8)

Sir Quett Masire, president of Botswana 1980-98, (student in the 1940's)

Dr. Ruth Segomotsi Mompati, Nelson Mandela's secretary in the 1950's, leader of the ANC women in exile and Mayor of Vryburg 2005-11, (student: 1940-44).

(<http://www.tigerkloof.com/index.php/about-us/history>)



Figure 5 – Historical buildings at Tiger Kloof

(<http://www.tigerkloof.com>)



Figure 6 – Figure 5 – Historical buildings at Tiger Kloof

A single farmstead was identified on Alternative alignment 1B, in the north-eastern limit of this alignment. The farmstead looks to be a working farm and could be impacted by a powerline close to its perimeter.

A few smaller structures that is most probably associated with farming activities have also been identified from maps and aerial photography. These all fall inside the Alt1B alignment corridor.

Palaeontological resources

The very high fossiliferous potential of the Boomplaas and Clearwater Formations, warrants an allocation of a Very High palaeontological sensitivity to the areas underlain by the rocks of the these formations. Areas underlain by calcrete are allocated a High palaeontological significance. All the areas underlain by Dolomite have a very high potential of containing cave breccias with highly sensitive fossil remains including remains of Homonin fossils. The breccias can be associated with areas underlain by calcretes as well.

Refer to Figure 7 for an indication of the heritage sensitivities of the alignments.

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;
- Full Palaeontological Impact Assessment, the entails fieldwork and assessment of the potential impacts of the findings of such fieldwork;

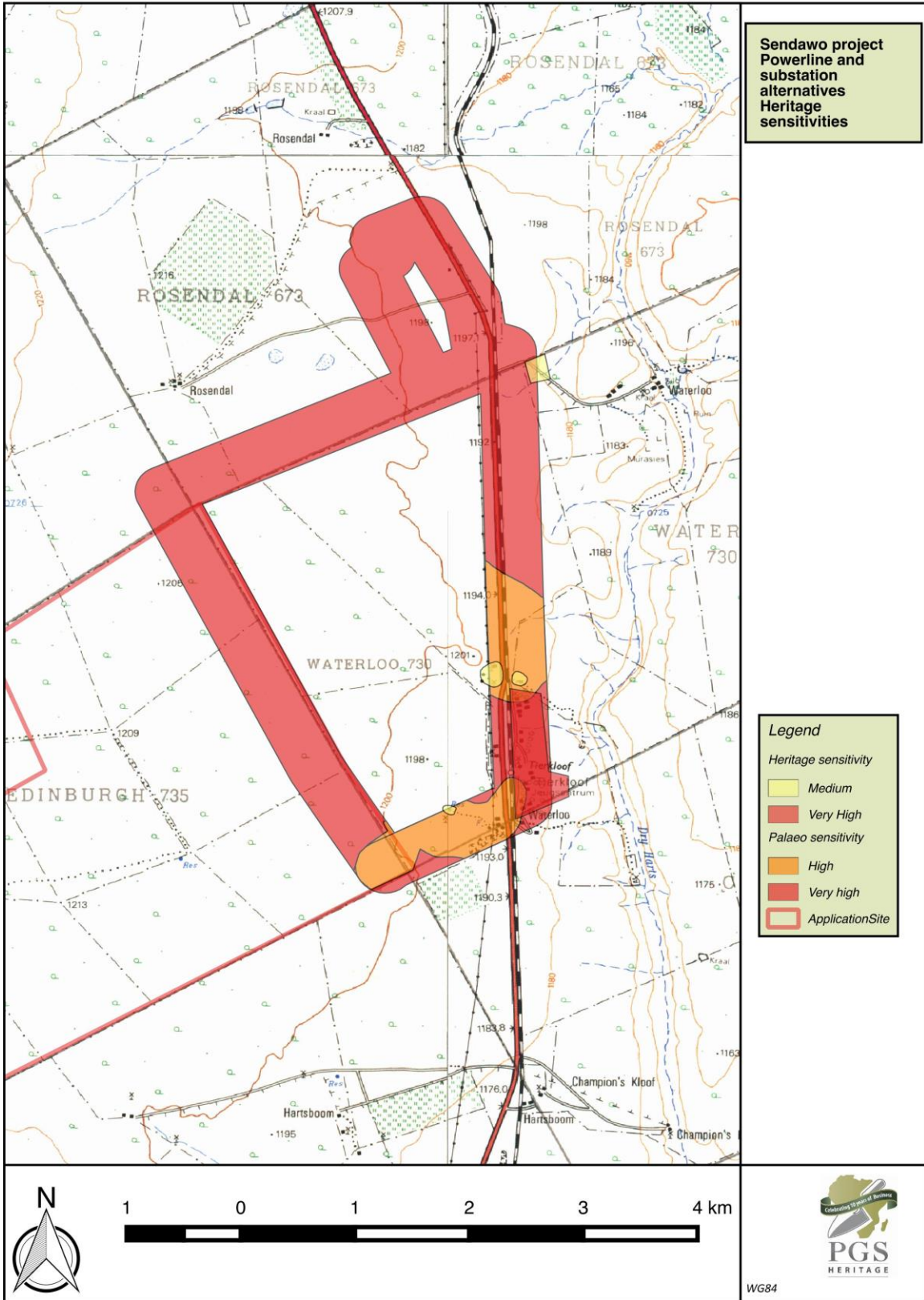


Figure 7 – Sendawo Solar heritage sensitivity map

4.3 Environmental Issues and Potential Impacts

ISSUE	Impact on archaeological sites
DISCUSSION	No indication of archaeological finds have been found during the desktop assessment. However this cannot exclude the possibility of archaeological finds .
EXISTING IMPACT	None known
PREDICTED IMPACT	Unidentified archaeological sites and the discovery of such sites during construction can seriously hamper construction timelines. Fieldwork can thus provide valuable information on such site in the study area and provide timeous management of such site through realignment of development or mitigation of such sites where needed.
EIA INVESTIGATION REQUIRED	Archaeological walk down of impact areas
CUMULATIVE EFFECT	None foreseen at this stage.

ISSUE	Impact on palaeontological sites
DISCUSSION	The palaeontological potential of the area has been confirmed as being moderate by the palaeontological desktop assessment
EXISTING IMPACT	Site impacted by existing developments such as transmission lines and road networks.
PREDICTED IMPACT	Due to the known occurrence of stromatolites within the dolomite of the Monte Christo Formation, as well as the possibility of Cave Breccias being present, a Moderate Palaeontological sensitivity rating is given to the study area.
EIA INVESTIGATION REQUIRED	A full Palaeontological impact assessment will be required
CUMULATIVE EFFECT	None foreseen at this stage.

ISSUE	Impact on historical sites
DISCUSSION	The archival research has shown that the historical activities in the area was wide spread during the South African War . The locality and position of the Tiger Kloof Educational Institute (provincial heritage site) needs to be considered as part of the assessment of Alternative 1B.
EXISTING IMPACT	None known
PREDICTED IMPACT	Unidentified historical structure and the discovery of such structures during construction can seriously hamper construction timelines.

	Fieldwork can thus provide valuable information on such site in the study area and provide timeous management of such site through realignment of development or mitigation of such sites where needed.
EIA INVESTIGATION REQUIRED	Archaeological walk down of impact areas will identify possible impacted sites
CUMULATIVE EFFECT	None foreseen at this stage.

5 SENDAWO (VRYBURG) POTENTIAL ISSUES

Alternative	Potential issues or fatal flaws
SUBSTATION SITE AND POWER LINE CORRIDOR	
Substation Site 1 and Corridor 1a	Palaeontological sensitivity – can be mitigated
Substation Site 1 and Corridor 1b	The Tiger Kloof Educational Institute is a provincial heritage site and covers a large portion of the Alternative 1B corridor on the Waterloo farm. This can constitute this alignment as fatally flawed .
Substation Site 2 and Corridor 2	Palaeontological sensitivity – can be mitigated

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 Sendawo project powerline grid and substation may have heritage resources present on the property. This has been confirmed through archival research and evaluation of aerial photography of the sites.

Archaeological resources

Some rocky outcrops that could possibly contain rock engravings and open air stone age sites have been identified as possible heritage sensitive areas.

Historical resources

Power line corridor Alternative 1B intersects the Tiger Kloof Educational Institute just before the proposed alignment turns west. This provincial heritage site was established in 1904 after closing down of the Moffat Institute at Kuruman. The Institutes foot print covers a large portion of Alternative 1B and could possibly be a fatal flaw on this corridor alternative

Palaeontological resources

The very high fossiliferous potential of the Boomplaas and Clearwater Formations, warrants an allocation of a Very High palaeontological sensitivity to the areas underlain by the rocks of the these formations. Areas underlain by calcrete are allocated a High palaeontological significance. All the areas underlain by Dolomite have a very high potential of containing cave breccias with highly sensitive fossil remains including remains of Hominin fossils. The breccias can be associated with areas underlain by calcretes as well.

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;
- Full Palaeontological Impact Assessment, the entails fieldwork and assessment of the potential impacts of the findings of such fieldwork;

6.1 SENDAWO (VRYBURG) POTENTIAL ISSUES

Alternative	Potential issues or fatal flaws
SUBSTATION SITE AND POWER LINE CORRIDOR	
Substation Site 1 and Corridor 1a	Palaeontological sensitivity – can be mitigated
Substation Site 1 and Corridor 1b	The Tiger Kloof Educational Institute is a provincial heritage site and covers a large portion of the Alternative 1B corridor on the Waterloo farm. This can constitute this alignment as fatally flawed .
Substation Site 2 and Corridor 2	Palaeontological sensitivity – can be mitigated

7 REFERENCES

7.1 Published References

Bergh, J.S. 1998. Geskiedenisatlas van die Vier Noordelike Provinsies. Van Schaik, Pretoria.

Bramford, M. & F. Thackeray. 2009. Continued Excavations at Wonderwerk Cave in The Digging Stick, Volume 26, No. 2.

Breutz, P.J. 1968. The Tribes of the Districts of Taung and Herbert. Department of Bantu Administration and Development, Ethnological Publication No. 51.

Dowson, T.A., Blundell, G. & Hall, S.L. 1992. Finger Paintings in the Harts River Valley, Northern Cape Province, South Africa in Southern African Field Archaeology, Volume 1, pp 27-32.

Humphreys, A.J.B. A Preliminary Report on Test Excavations at Dikbosch Shelter I, Herbert District, Northern Cape in The South African Archaeological Bulletin, Volume 29, No. 115 & 116

Kuman, K. 2001. An Acheulean Factory Site with Prepared Core Technology near Taung, South Africa. The South African Archaeological Bulletin, Vol. 56, No. 173/174 (Dec., 2001), pp. 8-22.

Legassick, M. 2010. The politics of a South African frontier: the Griqua, the Sotho-Tswana and the missionaries, 1780 – 1840. Basler Afrika Bibliographien, Basel.

Liebenberg, M.M.B. 1990. Schweizer-Reneke. HSRC, Pretoria.

Mitchell, P. 2002. The Archaeology of Southern Africa. Cambridge University Press, Cambridge.

Morris, D. 1988. Engraved in Place and Time: A Review of Variability in the Rock Art of the Northern Cape and Karoo. The South African Archaeological Bulletin Vol. 43, No. 148 (Dec., 1988), pp. 109-120

Republic of South Africa, 1999. National Heritage Resources Act, No. 25.

Snyman, P.H.R. 1986. Die Langeberg=Rebellie en die totstandkoming van Olifantshoek in Contree No. 20.

Raper, PE. 1983. Dictionary of Southern African Place Names. Head, Onomastic Research Centre, HSRC

Van Staden, A.J.C. 1983. Die Geskiedenis van die Nederduits Gereformeerde Gemeente Reivilo 1883-1983. Church Council of the Reivilo Dutch Reformed Church, Reivilo.

7.2 Unpublished References

Birkholtz, P. 2011. Heritage Impact Assessment for the proposed Pering Mining Project, Located on the farm Pering Mine 1023 HN, North West Province. An unpublished report compiled by PGS Heritage and Grave Relocation Consultants for Marsh (Pty) Ltd.

Kruger, N. 2013. Archaeological Impact Assessment for a Photovoltaic Power Plant and Power Line Development on Portion 1 of the farm Kangkatjes 919 HN, North West Province. An unpublished report compiled by Ages for Vidigenix (Pty) Ltd.

Van Schalkwyk, J. 2011. Heritage Impact Assessment for the proposed development of Photovoltaic Power Plants on Five Different Locations in the North West and Northern Cape Provinces. An unpublished report compiled for Subsolar.

Van Schalkwyk, J.A. 2012. Heritage Impact Assessment for the proposed development of a photovoltaic power plant on a portion of the Farm Waterloo 992, Vryburg Region, North West Province.

Van Schalkwyk, J.A. 2013. Basic Heritage Assessment for the proposed Mookodi 132kv Phase 2 Power Lines Development, North West Province.

7.3 Internet References

www.info.gov.za

www.beeld.com

www.wikipedia.org

www.jstor.org

Anglo Boere Oorlog/Boer War (1899-1902) British Concentration Camp project. Anglo Boere Oorlog/Boer War (1899-1902) VRYBURG Camp/Kamp. <http://www.geni.com/projects/Anglo-Boere-Oorlog-Boer-War-1899-1902-VRYBURG-Camp-Kamp/14136>. Accessed 30 May 2014.

7.4 Historic Topographic Maps

One of the historic topographic maps used in this report was obtained from the National Archives and the other from the digital resources of the William Cullen Library, Historical Papers, Early Maps collection.

7.5 Google Earth

All the aerial depictions and overlays used in this report are from Google Earth.



Appendix A

LEGISLATIVE PRINCIPLES

LEGISLATIVE REQUIREMENTS – TERMINOLOGY AND ASSESSMENT CRITERIA

3.1 General principles

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

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

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

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

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

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

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

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

3.2 Graves and cemeteries

Graves younger than 60 years fall under Section 2(1) of the Removal of Graves and Dead Bodies Ordinance (Ordinance no. 7 of 1925) as well as the Human Tissues Act (Act 65 of 1983) and are the jurisdiction of the National Department of Health and the relevant Provincial Department of Health and must be submitted for final approval to the Office of the relevant Provincial Premier. This function is usually delegated to the Provincial MEC for Local Government and Planning, or in some cases the MEC for Housing and Welfare. Authorisation for exhumation and reinterment must also be obtained from the relevant local or regional council where the grave is situated, as well as the relevant local or regional council to where the grave is being relocated. All local and regional provisions, laws and by-laws must also be adhered to. In order to handle and transport human remains the institution conducting the relocation should be authorised under Section 24 of Act 65 of 1983 (Human Tissues Act).

Graves older than 60 years, but younger than 100 years fall under Section 36 of Act 25 of 1999 (National Heritage Resources Act) as well as the Human Tissues Act (Act 65 of 1983) and are the jurisdiction of the South African Heritage Resource Agency (SAHRA). The procedure for Consultation Regarding Burial Grounds and Graves (Section 36(5) of Act 25 of 1999) is applicable to graves older than 60 years that are situated outside a formal cemetery administered by a local authority. Graves in the category located inside a formal cemetery administered by a local authority will also require the same authorisation as set out for graves younger than 60 years over and above SAHRA authorisation.

If the grave is not situated inside a formal cemetery but is to be relocated to one, permission from the local authority is required and all regulations, laws and by-laws set by the cemetery authority must be adhered to.



Appendix C

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 Sendawo Solar 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 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

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- 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 3: 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)	Grade 4A	High / Medium Significance	Mitigation before destruction
Generally Protected B (GP.B)	Grade 4B	Medium Significance	Recording before destruction
Generally Protected C (GP.A)	Grade 4C	Low Significance	Destruction



Appendix C

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

Methodology for Impact Assessment

The EIA Methodology assists in evaluating the overall effect of a proposed activity on the environment. The determination of the effect of an environmental impact on an environmental parameter is determined through a systematic analysis of the various components of the impact. This is undertaken using information that is available to the environmental practitioner through the process of the environmental impact assessment. The impact evaluation of predicted impacts was undertaken through an assessment of the significance of the impacts.

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 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.

Impact Rating System

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

- planning
- construction
- operation
- decommissioning

Where necessary, the proposal for mitigation or optimisation of an impact should be detailed. A brief discussion of the impact and the rationale behind the assessment of its significance has also been included.

- Rating System Used To Classify Impacts

The rating system is applied to the potential impact on the receiving environment and includes an objective evaluation of the mitigation of the impact. Impacts have been consolidated into one rating. In assessing the significance of each issue the following criteria (including an allocated point system) is used:

Table 4: Description

NATURE		
Include a brief description of the impact of environmental parameter being assessed in the context of the project. This criterion includes a brief written statement of the environmental aspect being impacted upon by a particular action or activity.		
GEOGRAPHICAL EXTENT		
This is defined as the area over which the impact will be expressed. Typically, the severity and significance of an impact have different scales and as such bracketing ranges are often required. This is often useful during the detailed assessment of a project in terms of further defining the determined.		
1	Site	The impact will only affect the site
2	Local/district	Will affect the local area or district
3	Province/region	Will affect the entire province or region
4	International and National	Will affect the entire country
PROBABILITY		
This describes the chance of occurrence of an impact		
1	Unlikely	The chance of the impact occurring is extremely low (Less than a 25% chance of occurrence).
2	Possible	The impact may occur (Between a 25% to 50% chance of occurrence).
3	Probable	The impact will likely occur (Between a 50% to 75% chance of occurrence).
4	Definite	Impact will certainly occur (Greater than a 75% chance of occurrence).
REVERSIBILITY		
This describes the degree to which an impact on an environmental parameter can be successfully reversed upon completion of the proposed activity.		
1	Completely reversible	The impact is reversible with implementation of minor mitigation measures
2	Partly reversible	The impact is partly reversible but more intense mitigation measures are required.
3	Barely reversible	The impact is unlikely to be reversed even with intense mitigation measures.
4	Irreversible	The impact is irreversible and no mitigation measures exist.

IRREPLACEABLE LOSS OF RESOURCES		
This describes the degree to which resources will be irreplaceably lost as a result of a proposed activity.		
1	No loss of resource.	The impact will not result in the loss of any resources.
2	Marginal loss of resource	The impact will result in marginal loss of resources.
3	Significant loss of resources	The impact will result in significant loss of resources.
4	Complete loss of resources	The impact is result in a complete loss of all resources.
DURATION		
This describes the duration of the impacts on the environmental parameter. Duration indicates the lifetime of the impact as a result of the proposed activity		
1	Short term	The impact and its effects will either disappear with mitigation or will be mitigated through natural process in a span shorter than the construction phase (0 – 1 years), or the impact and its effects will last for the period of a relatively short construction period and a limited recovery time after construction, thereafter it will be entirely negated (0 – 2 years).
2	Medium term	The impact and its effects will continue or last for some time after the construction phase but will be mitigated by direct human action or by natural processes thereafter (2 – 10 years).
3	Long term	The impact and its effects will continue or last for the entire operational life of the development, but will be mitigated by direct human action or by natural processes thereafter (10 – 50 years).
4	Permanent	The only class of impact that will be non-transitory. Mitigation either by man or natural process will not occur in such a way or such a time span that the impact can be considered transient (Indefinite).

CUMULATIVE EFFECT		
This describes the cumulative effect of the impacts on the environmental parameter. A cumulative effect/impact is an effect, which in itself may not be significant but may become significant if added to other existing or potential impacts emanating from other similar or diverse activities as a result of the project activity in question.		
1	Negligible Cumulative Impact	The impact would result in negligible to no cumulative effects
2	Low Cumulative Impact	The impact would result in insignificant cumulative effects
3	Medium Cumulative impact	The impact would result in minor cumulative effects
4	High Cumulative Impact	The impact would result in significant cumulative effects
INTENSITY/ MAGNITUDE		
Describes the severity of an impact		
1	Low	Impact affects the quality, use and integrity of the system/component in a way that is barely perceptible.
2	Medium	Impact alters the quality, use and integrity of the system/component but system/ component still continues to function in a moderately modified way and maintains general integrity (some impact on integrity).
3	High	Impact affects the continued viability of the system/ component and the quality, use, integrity and functionality of the system or component is severely impaired and may temporarily cease. High costs of rehabilitation and remediation.
4	Very high	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component permanently ceases and is irreversibly impaired (system collapse). Rehabilitation and remediation often impossible. If possible rehabilitation and remediation often unfeasible due to extremely high costs of rehabilitation and remediation.

SIGNIFICANCE		
<p>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:</p> <p>(Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity.</p> <p>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.</p>		
Points	Impact Significance Rating	Description
6 to 28	Negative Low impact	The anticipated impact will have negligible negative effects and will require little to no mitigation.
6 to 28	Positive Low impact	The anticipated impact will have minor positive effects.
29 to 50	Negative Medium impact	The anticipated impact will have moderate negative effects and will require moderate mitigation measures.
29 to 50	Positive Medium impact	The anticipated impact will have moderate positive effects.
51 to 73	Negative High impact	The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact.
51 to 73	Positive High impact	The anticipated impact will have significant positive effects.
74 to 96	Negative Very high impact	The anticipated impact will have highly significant effects and are unlikely to be able to be mitigated adequately. These impacts could be considered "fatal flaws".
74 to 96	Positive Very high impact	The anticipated impact will have highly significant positive effects.

The 2010 regulations also specify that alternatives must be compared in terms of impact assessment.