HERITAGE IMPACT ASSESSMENT

In terms of Section 38(8) of the NHRA for the

Proposed Development of Grid Connection Infrastructure for the Bulskop PV Cluster near Beaufort West, Western Cape

Prepared by CTS Heritage



For Bulskop Grid (Pty) Ltd

October 2021



1. Site Name:

Bulskop Grid Connection Infrastructure

2. Location:

Remaining Extent of Farm 423

Portion 4 of Farm 169

Portion 5 of Farm 169

Portion 1 of Farm Steenrotsfountain No 168

Portion 10 of Farm Weltevreden No 170

3. Locality Plan:

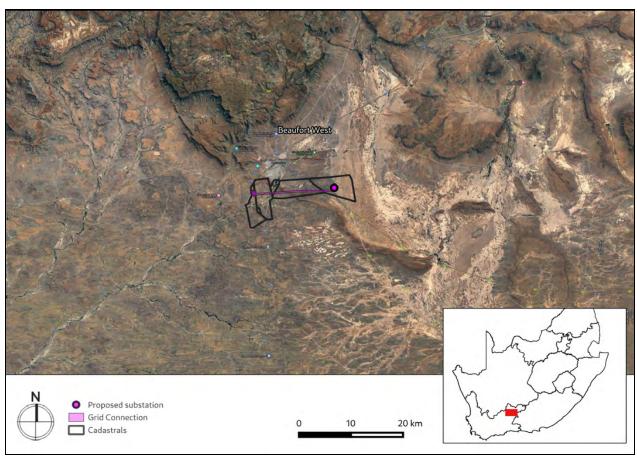


Figure 1: Location of the proposed development area

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16 Edison Way, Century City, Cape Town 7441

Tel: +27 (0)87 073 5739 Email info@ctsheritage.com Web http://www.ctsheritage.com



4. Description of Proposed Development:

Bulskop Grid (Pty) Ltd, proposes the construction and operation of grid connection infrastructure for the proposed Bulskop PV cluster located south-east of Beaufort West in the Western Cape Province. The grid connection corridor is located within the Beaufort West Renewable Energy Development Zone (REDZ) and the Central Strategic Transmission Corridor, areas earmarked for the development of large-scale renewable energy facilities and grid connection infrastructure and will traverse five (5) properties, namely:

- Remaining Extent of Farm 423
- Portion 4 of Farm 169
- Portion 5 of Farm 169
- Portion 1 of Farm Steenrotsfountain No 168
- Portion 10 of Farm Weltevreden No 170

The development of the Bulskop Grid Connection Infrastructure will include the following infrastructure components:

- A new Collector Substation/Switching Station of up to 1.25 ha in extent, including:
 - Construction of a new platform with earth mat and civil works.
 - New feeder bay/s and busbar/s (up to 132 kV) complete with protection equipment.
- A double-circuit power line of up to 132 kV between the Bulskop Collector Substation/Switching Station and the existing Droerivier Main Transmission Substation (MTS), complete with structures, foundations, conductor, fibre layout, insulation, and assemblies;
- A jeep track (up to 8 m wide) to provide access to and along the power line servitude;
- Works within the Droerivier MTS HV yard:
- Establish new feeder bay/s (up to 132 kV), inclusive of line bays, busbars, bussection and protection equipment.
- Provision to install a new transformer (up to 500 MVA 400/132 kV), if required.

A 17.5 km long and 300 m wide grid connection corridor will be assessed to allow for the optimisation of the grid connection infrastructure and to accommodate the environmental sensitivities identified within the corridor. Thereafter, the final placement of the grid connection infrastructure will be confirmed when the proposed Bulskop solar PV facilities are awarded Preferred Bidder status by the Department of Mineral Resources and Energy.

5. Heritage Resources Identified:

The findings of this assessment largely correlate with the findings of other assessments completed in the vicinity

such as the findings of the ACO (2013, SAHRIS NID 503074) who note that "Because of the scarcity of caves and

shelters, more than 90% of Karoo archaeological sites are open sites of stone artefacts, ostrich eggshell

fragments and occasionally, pottery. Bone remains are rarely preserved. Artefacts of both the Early and Middle

Stone Age are widespread and may generally be described as an ancient litter that occurs at a low frequency

across the landscape." This same archaeological signature has been identified within the development footprint.

It is noted that high numbers of quarried stone artefacts predominantly from the Middle Stone Age period were

found on this property which is consistent with observations on neighbouring farms through impact assessments

and research surveys. These artefacts are particularly visible in deflated open sites where the top soil has washed

away onto a harder gravel surface. No shelters were found on the property and no rock paintings, graves or

engravings were located.

Given the very sparse occurrence of recorded fossils in the region, and their unpredictable occurrence, it is

concluded that the Bulskop PV cluster grid connection project area is of LOW palaeosensitivity. No further

specialist palaeontological studies or mitigation are recommended for this electrical infrastructure project. The

Chance Fossil Finds Protocol appended to this report should be included in the EMPr for the developments.

No mitigation measures are recommended from a cultural landscape perspective given the low heritage

significance of the landscape directly affected by the project and the low impact on the broader landscape

context.

Based on the assessments completed, few sensitive heritage resources of low local cultural value have been

identified within or in proximity to the proposed development footprint. These include the R61, the Hansrivier

Farmhouse Complex (BLK055), an MSA artefact scatter and a number of small fossil exposures.

6. Anticipated Impacts on Heritage Resources:

No impact to these resources is anticipated from the proposed development of the Bulskop PV Cluster Grid

Connection Infrastructure development. As such, the proposed development is acceptable from a heritage

perspective and there is no objection to its authorisation from a heritage perspective.

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7. Recommendations:

Based on the outcomes of this report, it is not anticipated that the proposed development of the proposed grid connection infrastructure will negatively impact on significant heritage resources. The following recommendations are made:

- No impact must occur to the abandoned werf identified at BLK055 and as such, a 50m no-go buffer around this site is recommended
- The HWC Chance Fossil Finds Procedure must be implemented for the duration of construction activities
- Although all possible care has been taken to identify sites of cultural importance during the investigation of the study area, it is always possible that hidden or subsurface sites could be overlooked during the assessment. If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils, burials or other categories of heritage resources are found during the proposed development, work must cease in the vicinity of the find and HWC must be alerted immediately to determine an appropriate way forward.

8. Author/s and Date:
Jenna Lavin

October 2020



Details of Specialist who prepared the HIA

Jenna Lavin, an archaeologist with an MSc in Archaeology and Palaeoenvironments, and currently completing an MPhil in Conservation Management, heads up the heritage division of the organisation, and has a wealth of experience in the heritage management sector. Jenna's previous position as the Assistant Director for Policy, Research and Planning at Heritage Western Cape has provided her with an in-depth understanding of national and international heritage legislation. Her 8 years of experience at various heritage authorities in South Africa means that she has dealt extensively with permitting, policy formulation, compliance and heritage management at national and provincial level and has also been heavily involved in rolling out training on SAHRIS to the Provincial Heritage Resources Authorities and local authorities.

Jenna is on the Executive Committee of the Association of Professional Heritage Practitioners (APHP), and is also an active member of the International Committee on Monuments and Sites (ICOMOS) as well as the International Committee on Archaeological Heritage Management (ICAHM). In addition, Jenna has been a member of the Association of Southern African Professional Archaeologists (ASAPA) since 2009. Recently, Jenna has been responsible for conducting training in how to write Wikipedia articles for the Africa Centre's WikiAfrica project.

Since 2016, Jenna has drafted over 250 Screening and Heritage Impact Assessments throughout South Africa.



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1. INTRODUCTION

1.1 Background Information on Project

Bulskop Grid (Pty) Ltd proposes the construction and operation of grid connection infrastructure for the proposed Bulskop PV cluster of six facilities near Beaufort West in the Western Cape Province. The grid connection infrastructure comprises the following:

- One Eskom collector substation/ switching station;
- One double circuit 132 kV power line from the Bulskop collector substation/ switching station to the Droerivier Main Transmission Substation (MTS).

Additional associated infrastructure will also be required for the grid connection solution, including access roads, feeder bays (inclusive of line bays, busbars, bussection and protection equipment), a fibre and optical ground wire (OPGW) layout, insulation and assembly structures.

A grid connection corridor of approximately 300 m wide and 17.5 km long is being assessed to allow for the optimisation of the grid connection and associated infrastructure. The grid connection infrastructure will be developed within the 300m wide grid connection corridor, which will allow for the avoidance of identified environmental sensitivities. The grid corridor will connect the 6 PV projects to the Droerivier MTS.

Table 1: Project Details - Applicant and Technical Details

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Applicant Details	Bulskop Grid (Pty) Ltd				
Company Registration Number:	2021/885350/07				
BBBEE Status: N/A					
Project Name:	Bulskop Grid Connection Infrastructure				
Site Details	The grid connection crosses the following properties: Remaining Extent of Farm 423 Hans Rivier being Portion 5 of Farm No.169 Hans Rivier being Portion 4 of Farm No.169 Steenrotsfountain being Portion 1 of Farm No.168 Weltevreden being Portion 10 of Farm No. 170				



Grid connection	Substation to which project will connect.	The Bulskop grid connection infrastructure will facilitate the connection of six facility substations to a collector substation/ switching station, and then a single or double circuit 132 kV overhead powerline will connect the collector substation/ switching station to the National Grid via the Droerivier Main Transmission Substation (MTS).		
	Capacity of substations to connect facilities	One Eskom collector substation/ switching station which is referred to as the Bulskop collector substation/ switching station is required for the Bulskop Grid Connection Infrastructure.		
Power line/s	Number of overhead power lines required	A single or double circuit 132 kV overhead powerline from the Bulskop collector substation/ switching station to the Droerivier MTS is required for the Bulskop Grid Connection Infrastructure.		
	Voltage of overhead power lines	132 kV		
	Height of the Power Line	< 32 m		
	Servitude Width	Maximum of 31 m – 36 m.		
Auxiliary Infrastructure				
Other infrastructure	Additional Infrastructure	Access tracks/ roads Laydown areas		
	Details of access roads	The access roads will not exceed 8 m in width. Access to the grid connection infrastructure will be possible via existing roads in close vicinity to the infrastructure. Apart from these existing roads, the proposed Bulskop solar PV facilities will contain access roads that can also be used to access the infrastructure. Formal roads will not be constructed underneath the power lines for maintenance purposes; access for maintenance purposes will be limited to jeep tracks.		
	Extent of areas required for laydown of materials and equipment	Approximately 1- 2 ha of laydown areas will be required (Laydown areas will not exceed 2 ha).		



1.2 Description of Property and Affected Environment

The study area lies south and southeast of Beaufort West. The R61 main road to Graaff-Reinet dissects the eastern end while the N1 and N12 highways border the western side of the study area. The Hansrivier farm, currently abandoned, is in the central area while Farm 423 holds the area currently envisaged for the solar PV facilities. The entire study area was surveyed in order to provide various options for the layouts of the solar PV facilities as well as the route of the powerline connecting the energy generation area to the main substation nearer to the N12. Hansrivier Farm (Portion 4 of Farm 169) was recently advertised for tourism facilities through a tender on the Beaufort West Municipality's website and two 765kV powerline routes already traverse the full length of the property. The municipal refuse dump is on the northern border of Hansrivier farm and windblown litter was found extensively, even as far as the eastern side of the study area.

The landscape on the eastern side of Farm 423 is almost entirely flat besides one or two areas closer to the farmhouse where the slope gradient changes ever so slightly by a few metres. This area is denoted in the "Lower Plaat Doorns" area of the Council for Geosciences Map 3222 and mainly consists of hard baked Quaternary sands in a long dune cordon that extends north, south and eastwards of this property. Non-perennial rivers such as the Hansrivier, Kwaggarivier and Gamkarivier flow through parts of the study area along with small tributaries. However, at the time of this survey only 14mm of rain had fallen in the last year on the farm and all water courses were dry. Acacia thorn trees line the main watercourses. The topography around Hansrivier farm (Portion 4 and Portion 5 of Farm 169) is a little different to Farm 423 with low hills and ridges surrounding the Hansrivier with a relatively level plain on Steenrotsfontein farm extending to the Droërivier Sub Station. The vegetation has all but completely died off due to an extremely long period of drought in the Beaufort West area (approximately 5 years). We did not see many grazing animals during the survey and even reptiles and small antelope were scarce. A few meerkats and hares were observed as well as birdlife. The ground was easy to cover and visibility was excellent. Naturally occurring hornfels, greywacke and siltstones are abundant and litter the level plain. A high game fence forms the eastern boundary of the property and a few water tanks, mainly abandoned or demolished, were found dotted across the farm.

According to the Cultural Landscape Assessment (2021, Appendix 3), the site is characterised by the following:

- Regional location within the Great Karoo which is a vast arid area with a dispersed pattern of settlement, extensive stock farms, more recent game farms and irrigation based agriculture along the rivers; the vegetation cover is low, consistent with the Nama Karoo Biome.



- Location to the south of the regional centre of Beaufort West which dates to the late 18th century; town is framed by the Nuweveld escarpment to the north, lies between the Gamka and Kuils Rivers (normally dry) and on the outskirts lies the 75 000 hectare Karoo National Park; urban fringe activities to the south-east of the town, namely new cemetery and waste water treatment works.
- Site traversed by the R61 and N12.
- No significant landscape or built environment features are located on the site.
- Steenbokkie Private Nature Reserve is located to the northwest of the development corridor.
- Long views towards the Nuweveld escarpment add scenic value.
- Eskom power lines traverse the site and the Steenbokkie Private Nature Reserve.
- Located within the Beaufort West REDZ and in close proximity to other proposed solar power facilities.



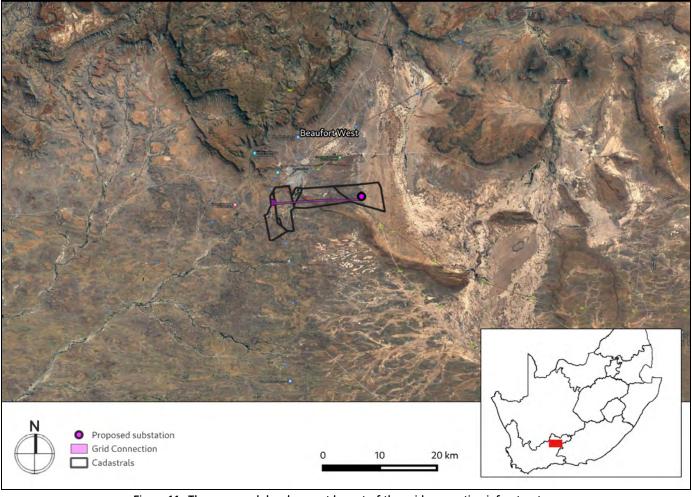


Figure 1.1: The proposed development layout of the grid connection infrastructure





Figure 1.2: The proposed development layout of the grid connection infrastructure

2. METHODOLOGY

2.1 Purpose of HIA

The purpose of this Heritage Impact Assessment (HIA) is to satisfy the requirements of section 38(8), and therefore section 38(3) of the National Heritage Resources Act (Act 25 of 1999) as well as Appendix 6 of the EIA Regulations, 2014.

2.2 Summary of steps followed

- A Desktop Study was conducted of relevant reports previously written (please see the reference list for the age and nature of the reports used)
- An archaeologist conducted an assessment of archaeological resources likely to be disturbed by the proposed development. The archaeologist conducted his site visit from 6 to 9 September 2021
- A palaeontologist conducted an assessment of palaeontological resources likely to be disturbed by the proposed development. The archaeologist conducted his site visit from 4 to 5 September 2021
- A cultural landscape assessment was conducted that covers the proposed development area with fieldwork completed on 10 and 11 October 2021 The results of this assessment were incorporated into this HIA.
- The identified resources were assessed to evaluate their heritage significance
- Anticipated impacts to these resources were identified and assessed.
- Alternatives and mitigation options were discussed with the Environmental Assessment Practitioner

2.3 Assumptions and uncertainties

- The *significance* of the sites and artefacts is determined by means of their historical, social, aesthetic, technological and scientific value in relation to their uniqueness, condition of preservation and research potential. It must be kept in mind that the various aspects are not mutually exclusive, and that the evaluation of any site is done with reference to any number of these.
- It should be noted that archaeological and palaeontological deposits often occur below ground level. Should artefacts or skeletal material be revealed at the site during construction, such activities should be halted, and it would be required that the heritage consultants are notified for an investigation and evaluation of the find(s) to take place.

However, despite this, sufficient time and expertise was allocated to provide an accurate assessment of the heritage sensitivity of the area.

2.4 Constraints & Limitations

At the time of survey the final layouts of the powerline connecting the facilities to the grid at the substation were

not yet finalised. However, based on preliminary layout proposals, the ground was intensively surveyed in the

eastern section in anticipation of the location of solar PV installations with two long traverses made across the

entire length of the study area from east to west to establish the anticipated heritage sampling rate and

sensitivities expected where the powerline will be built.

The prolonged drought in the area has resulted in large areas of denuded vegetation and this greatly contributed

to the excellent visibility of Stone Age and historical material scattered on the ground. We were therefore able to

achieve a high degree of coverage during the survey which accurately characterises the level of heritage

sensitivities encountered in the study area.

The experience of the heritage practitioner, and observations made during the study, allow us to predict with

some accuracy the archaeological sensitivity of the receiving environment.

HISTORY AND EVOLUTION OF THE SITE AND CONTEXT

3.1 Desktop Assessment

Background:

The area proposed for the grid connection for the Bulskop PV cluster is located approximately 6km south of

Beaufort West, between the R61 and the N12, and within the identified Beaufort West REDZ (Figure 2b). Beaufort

West was the first town to be established in the central Karoo.

Archaeology

A number of heritage assessments have been completed within close proximity to the area proposed for

development (Figure 2a). According to Nilssen (2014, SAHRIS NID 504763), "The Karoo houses a long and rich

archaeological record dating from the earliest stages of Stone Age technology that are over a million years old,

to the historic period that consists of the last few hundred years of human occupation (see Nilssen 2011 and

references therein). Archaeological sites include caves and rock shelters, open air artefact scatters, rock

engravings and historic structures with their associated cultural materials." According to ACO (2013, SAHRIS NID

503074), "Because of the scarcity of caves and shelters, more than 90% of Karoo archaeological sites are open

303074), Because of the scarcity of caves and shelters, more than 70% of Naroo archaeological sites are open

sites of stone artefacts, ostrich eggshell fragments and occasionally, pottery. Bone remains are rarely preserved.

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Artefacts of both the Early and Middle Stone Age are widespread and may generally be described as an ancient litter that occurs at a low frequency across the landscape. Where definable scatters of Early and Middle Stone Age material occur, they are considered to be significant heritage sites. More intensive occupation of the Karoo started around 13 000 years ago during the Later Stone Age, which is essentially the heritage of Khoisan groups who lived throughout the region. The legacy of the San includes numerous open sites while traces of their presence can also be found in most large rock shelters, often in the form of rock art. They frequently settled a short distance from permanent water sources (springs or waterholes) and made use of natural shelters such as rock outcrops or large boulders or even large bushes. In the Great Karoo natural elevated features such as dolerite dykes and ridges played a significant role in San settlement patterns."

Palaeontology

According to the SAHRIS Palaeosensitivity Map (Figure 4a), the area proposed for development is underlain by sediments of very high paleontological sensitivity. According to the extract from the Council for GeoSciences Map 3222 for Beaufort West, the development area is underlain by the Abrahamskraal and Teekloof Formations, both of the Adelaide Subgroup of the Beaufort Group of sediments. According to the SAHRIS Fossil Heritage Browser and the Palaeotechnic Report for the Western Cape (Almond and Pether, 2008), the Beaufort Group sediments are known to preserve diverse terrestrial and freshwater tetrapods of *Tapinocephalus* to *Lystrosaurus* Biozones (amphibians, true reptiles, synapsids – especially therapsids), palaeoniscoid fish, freshwater bivalves, trace fossils (including tetrapod trackways) and sparse vascular plants (*Glossopteris* Flora, including petrified wood). According to a map included in Almond (2011, SAHRIS NID 503273), the area proposed for development is located within the Pristerognathus Assemblage Zone of the Beaufort Group and a number of significant fossils have been identified in the immediate context of the proposed development in the academic literature (Figure 4c, Appendix 2). Based on the known paleontological sensitivity of this area, it is very likely that activities associated with the development of the proposed grid connection will negatively impact on significant fossil heritage.



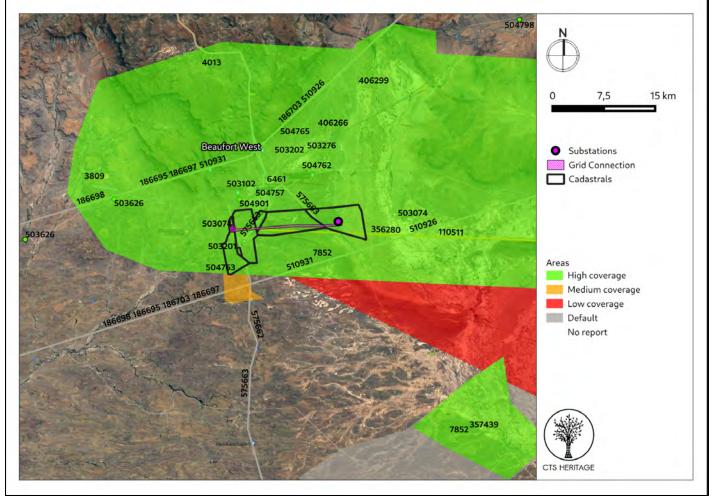


Figure 2: Spatialisation of heritage assessments conducted in proximity to the proposed development (see Appendices for insets)

Historic settlement and the Cultural Landscape (Winter et al. 2021)

The name 'Karoo' has its roots in the Khoisan word meaning 'place of great dryness'. It once supported large grassy flatlands and the San and Khoekhoen migrated across the region for hunting and gazing purposes. Less than two hundred years ago large herds of antelope still roamed the grass plains. With the occupation of the area by stock farmers the sheep gradually replaced the game and the grass receded along with changing grazing and weather patterns (Winter et al 2009; Winter & Oberholzer 2013). By the late 17th century, the Khoekhoen had moved from the region into the more water-rich southern Karoo and the coastal plains. During the early colonial period, the harshness of the Karoo region formed an almost impenetrable barrier from the Cape to the interior for

colonial explorers, hunters and travellers. The 18th century was characterized by a marked increase in the rate of expansion of the boundaries of the settlement at the Cape. This was associated with the emergence of the migrant stock farmer (trekboer) (Guelke 1982 In Winter et al 2009). Early routes into the interior largely followed the tracks initially used by migrating herds of game or the cattle herds and sheep flocks of the Khoekhoen on

their seasonal route between coastal and inland grazing grounds. These routes were later reinforced by

generations of trek farmers moving between the markets at the Cape and their farms (Winter et al 2009).

Permanent settlement of the region only really occurred in the 19th century with towns being established near permanent water sources. It was during this period that Beaufort West was established as a drostdy in 1818 on the farm Hooyvlakte. In the same year, a mission station was established at Kookfontein, just outside Beaufort West (Winter et al 2009) but was disbanded within three years. With the occupation of the area by stock farmers, sheep replaced game, the grass receded, and farmers became suppliers of fresh meat to the refreshment station in

place of Khoe (Guelke 1982 In Winter et al 2009). Expansion was fiercely opposed by the San, who resisted

alienation from water sources until forcibly suppressed by the 1790s. Other new arrivals to the Central Karoo

include Xhosa, alienated from their grazing lands in the eastern Cape (Anderson 1985).

British colonial rule from 1806 brought a new landownership policy that transferred loan farms to perpetual quitrent. This imposed "settled agriculture", unsustainable without large land parcels and sure access to water, which further dispossessed Khoe, Xhosa and many of the poorer trekboers unable to fit the legal system. They were pushed beyond the escarpment or subjugated to a life of labour, and were replaced by wealthy farming

burghers, merchants and officials (Anderson 1985, Guelke Shell 1992).

Beaufort West became the first municipality in South Africa on 3 February 1837 and had the country's first town hall. When the railroad reached the town in 1880 it became a marshalling yard and locomotive depot and today it is the largest town in the Karoo. A number of the significant heritage resources located in close proximity to the proposed development are located within Beaufort West and are associated with the early colonial history of the

town (Figure 3a and Appendix 1).

The proposed development is located only 10km to 15km from the N1 and almost immediately adjacent to the N12 which is identified as a secondary scenic route in the Western Cape PSDF (2014). Furthermore, the proposed

development is located within a scenic corridor on the approach to Beaufort West from Cape Town within an area

Cedar Tower Services (Pty) Ltd t/a CTS Heritage
16 Edison Way, Century City, Cape Town 7441

Tel: +27 (0)87 073 5739 Email info@ctsheritage.com Web http://www.ctsheritage.com



that has limited topography (Figure 4).

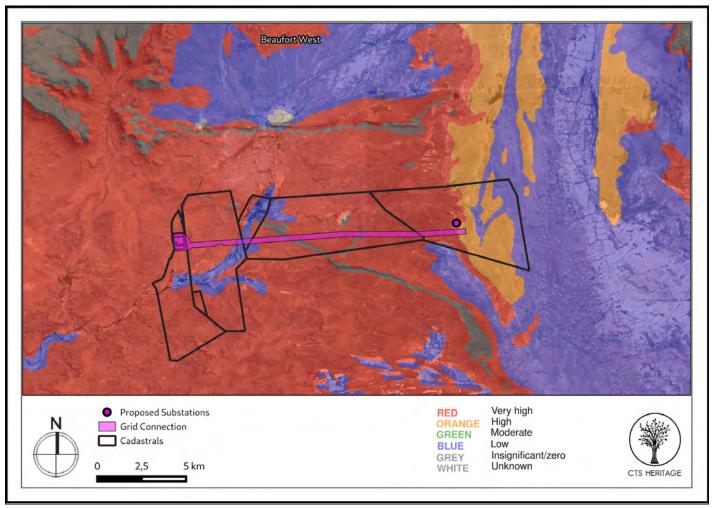


Figure 3.1: Palaeontological sensitivity of the proposed development area



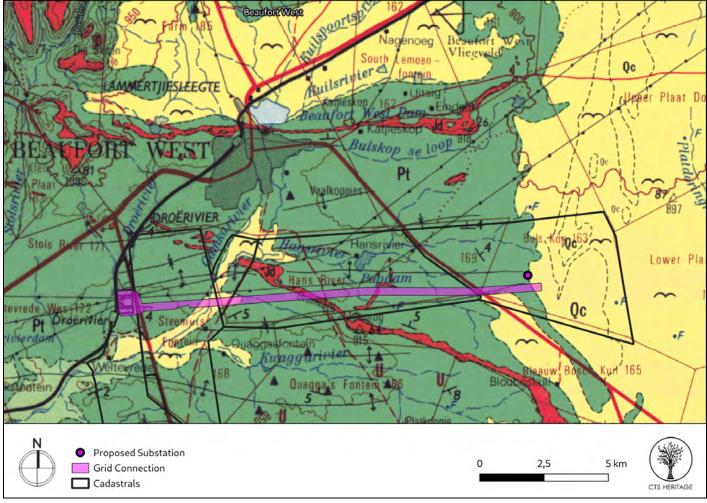


Figure 3.2: Geology Map. Extracted from the Council for GeoSciences Map 3222 for Beaufort West indicating that the development area is underlain by Pa: Abrahamskraal Formation and Pt: Teekloof Formation, both of the Adelaide Subgroup of the Beaufort Group of sediments



Table 1: Explanation of symbols for the geological map and approximate ages

Symbol	Group/Formation	Description			
Pt	Teekloof Formation, mainly Poortjie Member	The age of the upper Poortjie beds as determined from volcanogenic tuff marker beds is c. 260 – 258 Ma (i.e. latest Capitanian to earliest Wuchiapingian), spanning the key stratigraphic boundary between the Middle and Late Permian Period (Day & Smith 2020). The sedimentology of the			
		Abrahamskraal – Teekloof transition has been addressed recently by Paiva (2015)			
Jd	Karoo Dolerite Suite	The prominent-weathering dyke ridge, with a steeper SW scarp and gentler NE slopes mantled by doleritic colluvial gravels, stands out clearly as a rusty-brown strip on satellite images and is associated with local baking of the country rocks to pale quartzite and darker hornfels			
Qc	Late caenozoic calcrete and alluvium	Sandstone gravels here are ultimately derived from a broad belt of coarse alluvial deposits related to ancient Caenozoic drainage systems draining the Great Escarpment, as reflected in the deep notch in the Escarpment due north of the site and the relict Platdoringrivier drainage line further to the east.			



4. IDENTIFICATION OF HERITAGE RESOURCES

4.1 Summary of findings of Specialist Reports

Cultural Landscape and the Built Environment (Winter et al. 2021, Appendix 3)

Cultural landscape assessments typically require assessments at various scales including regional, site and individual elements scales. The context of this particular study area is different in that there are very few features or structuring elements that create variations across the landscape.

As a general statement the landscape of the study area is an open, barren, featureless and homogenous landscape with little variation in topography, land use and vegetation. It compromises very few productive elements in terms of agriculture and built form. The only distinctive features are long distance views towards the Nuweveld escarpment to the north. The primary structuring element at the broader landscape scale is the escarpment immediately to the north above the N1. Embedded within this landscape is the Karoo National Park and historic/scenic routes and passes. The secondary structuring element is the route network and settlement pattern centred on Beaufort West which is at the confluence of the N1, N12 and R61.

The R61 traverses the site; the grid connection is located mostly to the west of the R61 and the PV cluster to east. The R61 could be considered to have some significance as an important linkage route and in traversing a representative karoo landscape of what is colloquially known as 'Die Vlakte' – a vast, open, flat landscape with a dispersed pattern of settlement. This landscape does not constitute a heritage resource from a cultural landscape perspective. The R61 does not warrant scenic drive status. There are no landscape and built features worthy of formal protection from a cultural landscape perspective. There are a series of koppies located immediately to the east of the R61 which provide a degree of visual interest.

The landscape associated with the proposed grid connection is dominated by an existing infrastructural corridor with a range of Eskom power lines and pylons. The Steenbokkie Private Nature Reserve is located immediately to the north of the site but does not constitute a heritage resource from a cultural landscape perspective with power lines running through the landscape. The site is located some 10km away from the historic core of Beaufort West but bares no visual-spatial relationship. The site is separated from the town by an existing infrastructural corridor and urban fringe activities located immediately to the south-east of Beaufort West. See Figure 4.3.

In summary, the site cannot be regarded as a cultural landscape worthy of formal protection.

The Hansrivier farmhouse complex (approximately 1 km north of the grid corridor) is currently abandoned and consists of the main farmhouse, painted yellow with a green corrugated roof and outbuildings as well as vandalised/ruined labourers cottages (Figure 4.1 and 4.2). The farm was recently advertised for tourism proposals through a tender on the Beaufort West Municipality's website. Most of the buildings seen at the farms incorporated in the study area are modern and are not older than 60 years.

Archaeology (Appendix 1)

Middle Stone Age artefacts are dominant with a smaller amount of Later Stone Age material. The MSA artefacts also appeared to hold two different subsets - an early MSA, or possibly a late ESA assemblage and a typical later MSA assemblage likely dating to the last 100 000 years. The artefacts were found on the surface in deflated areas and it is difficult to determine the date range purely based on the typology of the material found, however, further studies may find a continuous occupation record throughout the MSA.

The artefactual material was rarely retouched and volumes at each assessed location were low as no significant source outcrops of raw stone materials were found. It appears that hunter-gatherers moved through this part of the landscape, sampling the smaller cobbles and leaving a couple of struck flakes at a time over a widely dispersed area which can be attributed to the long period over which this pattern of behaviour took place. Higher concentrations of material will no doubt be found closer to the main water sources and natural shelters formed in kloofs surrounding the area. Most of the cobbles were extremely weathered, patinated by desert varnish and submersion in mud and dust over millennia. 79 locations spread across the study area were assessed with most (75) holding MSA or LSA open-site materials dominated by greywacke, siltstones and hornfels. Besides various small farm dams and windmills spread evenly throughout the farms, historical layering is concentrated at the Hansrivier farmhouse complex which is situated in the middle of the study area.

When moving closer to the river courses, thicker fluvial sands seemed to obscure the amount of artefacts seen and it is likely that previous flooding events have shifted the position of MSA material in these areas. Artefact visibility increased as one moved about 100-200m away from the river courses. Small dolerite outcrops east of the Hansrivier farm dam were also assessed but no engravings were found.

Cedar Tower Services (Pty) Ltd t/a CTS Heritage
16 Edison Way, Century City, Cape Town 7441

Tel: +27 (0)87 073 5739 Email info@ctsheritage.com Web http://www.ctsheritage.com

Palaeontology (Appendix 2)

The Bulskop grid connection project area is situated on the margins of the Aberdeen Vlaktes, an ancient land

surface of possible Miocene age. The Lower Beaufort Group (Permian) bedrocks here are entirely covered by a

thick calcrete hardpan and reworked sandy to gravelly alluvial deposits of low palaeosensitivity. The c. 17.5 km

long grid connection corridor to the existing Droërivier MTS due SW of Beaufort West comprises more dissected

terrain with low hills, colluvial slopes and alluvial *vlaktes* with limited exposure of potentially-fossiliferous bedrocks

of the Late Permian Teekloof Formation (Lower Beaufort Group).

The provisional palaeosensitivity mapping for the Bulskop PV associated grid connection corridor, based on the

DFFE Screening Tool and SAHRIS website, is *contested* in the palaeontological report. Beaufort Group bedrocks

are poorly exposed along much of the grid connection corridor and conservation-worthy fossils here are very

sparse indeed. An overall LOW palaeosensitivity for the combined PV cluster and grid connection project areas is

inferred here, although the potential for isolated vertebrate fossil finds of high scientific interest - as recorded

elsewhere in the Beaufort West region - cannot be completely discounted.

4.2 Heritage Resources identified

The Cultural Landscape Assessment identified low levels of significance of the study area and its landscape

context. Only one aspect of the broader study area was identified to have some cultural significance - it was

noted that the R61 could be considered as an important linkage route and in traversing a representative karoo

landscape of what is colloquially known as 'Die Vlakte' The proposed development of the Bulskop PV Facility may

negatively impact on how this linkage route is experienced (Figure 4.3).

There are two broad heritage related indicators that have been identified in the Cultural Landscape Assessment in

terms of the siting and layout of the PV cluster that would mitigate negative impact to the cultural landscape

significance of the study area and its landscape context:

- The use of the existing infrastructural transmission corridor for the grid connection.

- To avoid slightly elevated topographical features within the scenic corridor of the R61.

The significant heritage resources identified in the archaeology field assessment are detailed in Table 2. A number

of archaeological resources were identified within the grid connection corridor, however only one heritage

resource of significance was identified during the field assessments conducted for the proposed grid connection

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(BLK055). The remaining heritage resources were determined to be Not Conservation-Worthy and are discussed in more detail in Appendix 1 (Archaeology Impact Assessment).

A very sparse scatter of fossil sites of the Middle to Late Permian *Endothiodon* Assemblage Zone was recorded from the bedrocks of the Late Permian Teekloof Formation (Lower Beaufort Group) during the site visit, comprising a few small dicynodont skulls within calcrete concretions weathering out from overbank mudrock facies, occasional robust fragments of rolled bone among ferruginous carbonate surface gravels and low diversity invertebrate trace fossil assemblages within channel sandstones. The only fossils recorded within the Late Caenozoic alluvial deposits are occasional calcretised termaria of possible Pleistocene or Holocene age. The Palaeozoic and Caenozoic fossil sites all lie on the margins of, or shortly outside, the project footprint (See satellite map A1 in Appendix 1), most of which are of modest scientific or conservation value and no mitigation in their regard is recommended here. These palaeontological findings are detailed in Table 3.

All the heritage resources identified and mentioned above are mapped relative to the proposed development in section 4.3 below.



Table 2: Artefacts identified during the field assessment for the proposed grid connection (to be read in conjunction with the maps in section 4.3)

POINT ID	Site Name	Period	Description	Co-ordinates		Grading	Mitigation
			Hansrivier farmhouse complex. Currently				
			abandoned – consists of a main farmhouse				
			painted yellow with green corrugated roof and	corrugated roof and			
		Modern,	outbuildings as well as vandalised/ruined				
BLK 055	Bulskop 055	Historic	labourers cottages32.39148 22.62556		IIIC	50m Buffer	





Figure 4.1: Observation BLK055 (Grade IIIC) located approximately 1km from the grid connection corridor



Figure 4.2: Observation BLK055 (Grade IIIC) located approximately 1km from the grid connection corridor



Table 3: Palaeontological observations made during the field assessment for the proposed grid connection (to be read in conjunction with the maps in section 4.3)

POINT ID	Site Name	Description	Co-ord	inates	Grading	Mitigation	
PAL_BLK 002	Palaeo Bulskop 002	Portion 1 of Farm Steenrotsfountain No 168. Pebble-sized, well-rounded fragment of rolled bone of sizeable Permian tetrapod among surface gravels dominated by ferruginous carbonate concretions. Proposed Field Rating IIIC Local Resource. No mitigation necessary since fossil site lies outside project footprint.	-32.40461111	22.56426667	IIIC	None	
PAL_BLK 003	Palaeo Bulskop 003	Portion 1 of Farm Steenrotsfountain No 168. Two subrounded fragments of rolled bone of sizeable Permian tetrapod (possibly same individual as above) among surface gravels dominated by ferruginous carbonate concretions. Proposed Field Rating IIIC Local Resource. No mitigation necessary since fossil site lies outside project footprint.	-32.40447778	22.56396111	IIIC	None	
PAL_BLK 004	Palaeo Bulskop 004	Portion 4 of Farm 169 Hansrivier. Pebble-sized, well-rounded fragment of rolled bone of sizeable Permian tetrapod among surface gravels dominated by ferruginous carbonate concretions. Proposed Field Rating IIIC Local Resource. No mitigation necessary since fossil site lies outside project footprint.	-32.40398333	22.57703889	IIIC	None	
PAL_BLK 005	Palaeo Bulskop 005	Portion 4 of Farm 169 Hansrivier. Poorly-preserved, calcretised termitarium weathering-out from within sandy to fine gravelly stream alluvium. Probably Pleistocene to Holocene in age. Proposed Field Rating IIIC Local Resource. No mitigation necessary since fossil site lies outside project footprint.	-32.40795	22.58929444	IIIC	None	
PAL_BLK 006	Palaeo Bulskop 006 Portion 4 of Farm 169 Hansrivier. Small pedogenic calcrete concretions weathering out from grey overbank mudrocks of the Lower Beaufort Group and containing skulls of small-bodied dicynodonts (probably Diictodon) and disarticulated postcranial remains. Proposed Field Rating IIIB Local Resource. No mitigation necessary since fossil site lies outside project footprint.		-32.40576389	22.60020278	IIIB	None	
PAL_BLK 007 Bulskop 007 Portion 4 of Farm 169 Hansrivier. Well-developed, reddish-brown Lower Beaufort Group channel brecci composed of reworked mudflake intraclasts as well calcrete nodules with occasional interspersed smal fragments of reworked bone (unidentifiable). Propos Field Rating IIIC Local Resource. No mitigation necessions.		-32.40085278	22.62115278	IIIC	None		



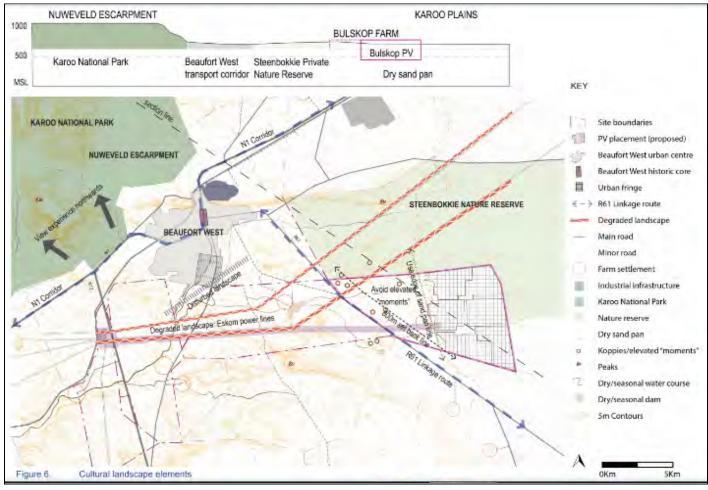


Figure 4.3 Cultural Landscape Elements Map from Winter et al. 2021 (Appendix 3)



4.3 Mapping and spatialisation of heritage resources

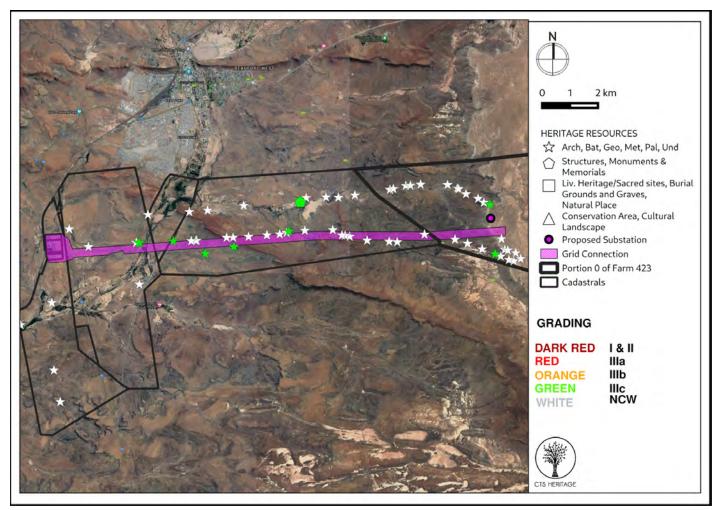


Figure 5: Map of heritage resources within the proposed grid connection alignment



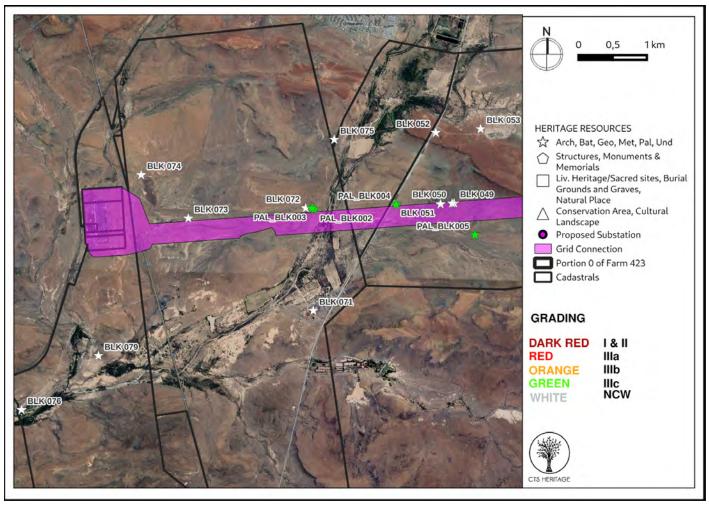


Figure 5.1: Map of heritage resources within the proposed grid connection alignment



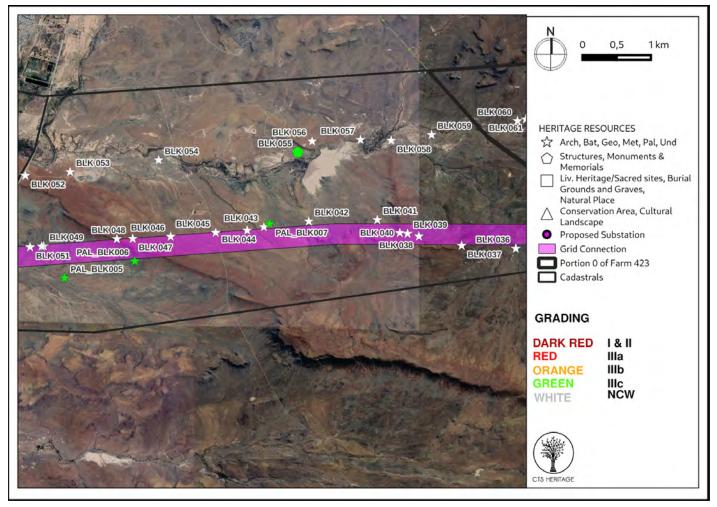


Figure 5.2: Map of heritage resources within the proposed grid connection alignment



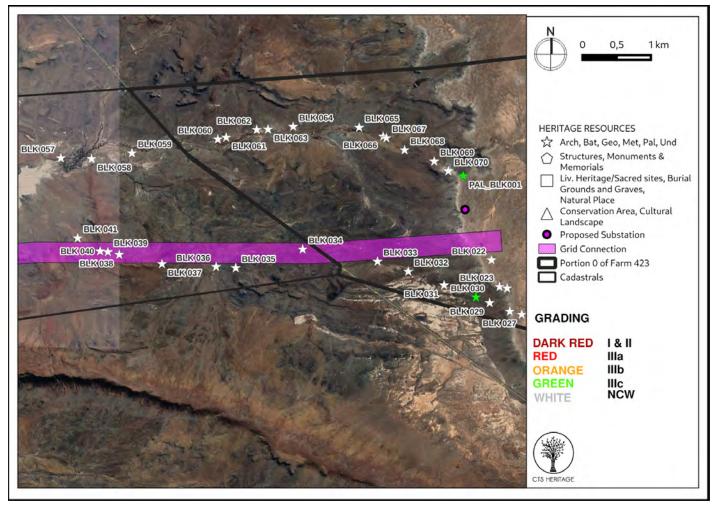


Figure 5.3: Map of heritage resources within the proposed grid connection alignment

5. ASSESSMENT OF THE IMPACT OF THE DEVELOPMENT

5.1 Assessment of impact to Heritage Resources

Cultural Landscape

The nature of the intervention in the form of a grid connection will have a negligible impact on cultural landscape

heritage resources.

The Cultural Landscape Assessment identified the R61 as having some cultural value as a linking route through the

flat Karoo landscape. The siting of the grid connection development complies with the broad heritage indicators

identified in the Cultural Landscape Assessment in terms of mitigating potential negative impacts::

- The grid connection makes use of the existing infrastructural corridor.

- The project will have minimal impact on the Karoo National Park and associated escarpment due to

distance, the location of the Beaufort West in between the project and Park and the existing

infrastructural corridor as a dominant visual component in this immediate landscape.

No negative impact to any cultural landscape resources of heritage value are anticipated and no mitigation

measures are recommended from a cultural landscape perspective given the low heritage significance of the

landscape directly affected by the project and the low impact on the broader landscape context.

Archaeology

The proposed development will not have a negative impact on the heritage resources identified within the

proposed development area for the PV facility and the grid connection.

The majority of the lithic material identified is of low significance (not conservation-worthy), and even though the

resources may be destroyed during construction, the impact is insignificant. No mitigation is required for

archaeological material recorded in the footprint areas of the proposed development. Despite the high number of

observations of artefacts, these resources are common and representative of similar scatters across widespread

areas of the Karoo.

Additionally, one abandoned Farm Werf, the Hansrivier Farmhouse complex, was identified within 1km of the area

proposed for the grid alignment (BLK055). This site is described as consisting of a main farmhouse painted yellow

with green corrugated roof and outbuildings as well as vandalised/ruined labourers' cottages. This werf is not

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particularly significant per se as most of the additions and buildings are modern and no impact is anticipated as the proposed grid connection corridor is located approximately 1km south of the farm werf. To ensure that no

impact occurs, we have recommended a 50m buffer around this site.

Despite the very high numbers of observations made, the archaeological material is ubiquitous across the entire

area and in general, the results of this assessment indicate that the archaeological sensitivity of the development

area is low.

Palaeontology

Many sectors of the grid connection corridor to the Droerivier Substation look palaeontologically promising on

satellite imagery. However, in practice Beaufort Group bedrock exposure here - especially of less resistant

mudrock facies that are the principal focus for palaeontological surveying - is very limited due to extensive cover

by colluvial and alluvial sediments.

A few gentle hillslope exposures of Poortjie Member mudrocks on Portion 4 of Farm 169 Hansrivier have yielded

several skull and post-cranial remains of small-bodied dicynodonts. These are probably Diictodon, the

commonest tetrapod in the Lycosuchus - Eunotosaurus Subzone. In contrast, other excellent exposures appear to

be palaeontologically barren. Several reworked ("rolled") blocks of robust tetrapod bone are recorded among

surface gravels on the margins of the grid connection corridor, especially in areas rich in ferruginous carbonate

pedocrete concretions - and doubtless additional, unrecorded specimens occur elsewhere within the corridor. The

reworked fossil material is probably unidentifiable - the robustly-built dicynodont *Endothiodon* is one likely

candidate - and of limited scientific or conservation value. The only fossils recorded within Late Caenozoic

superficial sediments within or close to the grid corridor comprise occasional calcretised termitaria (termite nests)

within younger alluvial sediments of Pleistocene or Holocene age. The fossil material recorded all lies close to but

outside the grid connection corridor.

Given the very sparse occurrence of recorded fossils in the region, and their unpredictable occurrence, it is

concluded that the Bulskop PV cluster grid connection project area is of LOW palaeosensitivity and no impact to

significant palaeontological heritage resources is anticipated. No further specialist palaeontological studies or

mitigation are recommended for this electrical infrastructure project. The Chance Fossil Finds Protocol appended

to this report should be included in the EMPr for the developments.

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5.2 Sustainable Social and Economic Benefit

The proposed grid alignment is intended to service PV facilities with are proposed for development. The grid connection will ensure that the power generated is fed into the national grid for distribution. According to the developer, the anticipated sustainable socio-economic benefits to be derived from the proposed development of the PV facilities include:

- Creation of employment and business opportunities, and the opportunity for skills development and on-site training.
- The establishment of infrastructure to generate renewable energy;
- Creation of employment and business opportunities. The operational phase will also create opportunities for skills development and training;
- Benefits associated with the establishment of a Community Trust; and
- Generation of income for affected landowner/s.

Based on the outcome of this assessment, the proposed development is not anticipated to have a significant negative impact on heritage resources and as such, the anticipated socio-economic benefits to be derived from this project outweigh the anticipated negative impacts to heritage resources.

5.3 Proposed development alternatives

While no specific alternatives have been considered for the proposed grid alignment, the development can fall anywhere within the 300m grid corridor assessed in this report. No significant heritage resources were identified within this grid corridor and as such, the corridor is considered suitable from a heritage perspective.

5.4 Cumulative Impacts

At this stage, there is the potential for the cumulative impact of proposed renewable energy facilities and their associated grid connection infrastructure to negatively impact the cultural landscape due to a change in the landscape character from natural wilderness to semi-industrial. Based on the available information, a number of renewable energy facilities and their associated grid connection infrastructure have been approved in the immediate vicinity of the proposed development, as well as presently proposed for this immediate environment.

While the cumulative impacts associated with this proposed development are therefore likely to be high, it is noted that it is preferable to have renewable energy facility development focussed in an area such as a REDZ.



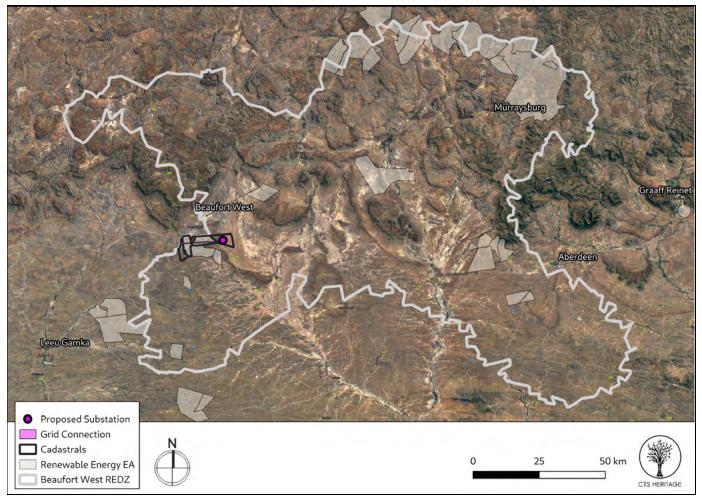


Figure 4: Approved REF projects within 50km of the proposed development area

6. RESULTS OF PUBLIC CONSULTATION

There is one Heritage Conservation Body registered on the HWC database for the area proposed for development - Simon van der Stel Foundation, Southern Cape. As such, in terms of the HWC Guidelines for Heritage Impact Assessments which apply to this application, the relevant Local Authorities - Beaufort West in the Western Cape - and the Simon van der Stel Foundation are provided with 30 days in which to comment on the DRAFT HIA. Evidence of this consultation is provided in Appendix 5.

As this application is made in terms of NEMA, the public consultation on the HIA will take place with the broader public consultation process required for the Basic Assessment process and will be managed by the lead

environmental consultants on the project.

7. CONCLUSION

The findings of this assessment largely correlate with the findings of other assessments completed in the vicinity such as the findings of the ACO (2013, SAHRIS NID 503074) who note that "Because of the scarcity of caves and shelters, more than 90% of Karoo archaeological sites are open sites of stone artefacts, ostrich eggshell

fragments and occasionally, pottery. Bone remains are rarely preserved. Artefacts of both the Early and Middle

Stone Age are widespread and may generally be described as an ancient litter that occurs at a low frequency

across the landscape." This same archaeological signature has been identified within the development footprint.

It is noted that high numbers of quarried stone artefacts predominantly from the Middle Stone Age period were

found on this property which is consistent with observations on neighbouring farms through impact assessments

and research surveys. These artefacts are particularly visible in deflated open sites where the top soil has washed

away onto a harder gravel surface. No shelters were found on the property and no rock paintings, graves or

engravings were located.

Given the very sparse occurrence of recorded fossils in the region, and their unpredictable occurrence, it is

concluded that the Bulskop PV cluster grid connection project area is of LOW palaeosensitivity. No further

specialist palaeontological studies or mitigation are recommended for this electrical infrastructure project. The

Chance Fossil Finds Protocol appended to this report should be included in the EMPr for the developments.

No mitigation measures are recommended from a cultural landscape perspective given the low heritage

significance of the landscape directly affected by the project and the low impact on the broader landscape

context.

Based on the assessments completed, few sensitive heritage resources of low local cultural value have been

identified within or in proximity to the proposed development footprint. These include the R61, the Hansrivier

Farmhouse Complex, an MSA artefact scatter and a number of small fossil exposures.

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No impact to these resources is anticipated from the proposed development of the Bulskop PV Cluster Grid Connection Infrastructure development. As such, the proposed development is acceptable from a heritage perspective and there is no objection to its authorisation from a heritage perspective.

8. RECOMMENDATIONS

Based on the outcomes of this report, it is not anticipated that the proposed development of the proposed grid connection infrastructure will negatively impact on significant heritage resources. The following recommendations are made:

- No impact must occur to the abandoned werf identified at BLK055 and as such, a 50m no-go buffer around this site is recommended
- The HWC Chance Fossil Finds Procedure must be implemented for the duration of construction activities
- Although all possible care has been taken to identify sites of cultural importance during the investigation of the study area, it is always possible that hidden or subsurface sites could be overlooked during the assessment. If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils, burials or other categories of heritage resources are found during the proposed development, work must cease in the vicinity of the find and HWC must be alerted immediately to determine an appropriate way forward.



9. **REFERENCES**

	Heritage Impact Assessments						
Nid	Report Type	Author/s	Date	Title			
3809	AIA Phase 1	Cobus Dreyer	29/09/2005	Archaeological and Historical Investigation of the Proposed Residential Developments at the Farms Grootfontein 180 & Bushmanskop 302, Beaufort West, South-Western Cape			
4013	AIA Phase 1	Jonathan Kaplan	01/02/2006	Phase 1 Archaeological Impact Assessment Proposed Klavervlei Powerline Karoo National Park			
4153	AIA Phase 1	Hilary Deacon	27/06/2005	Central Karoo District Municipality Borrow Pit Archaeological Impact Assessment Report: Existing Borrow Pit on DR 2308 Km 59 L (Dam), Farm Grootfontein 180			
6461	AIA Phase 1	Jonathan Kaplan	01/02/2008	Phase 1 Archaeological Impact Assessment: Proposed Development Remainder of Farm 185 (Now Called Plot 8419) Beaufort West, Western Cape Province			
7852	AIA Phase 1	J Kinahan	03/10/2008	Archaeological Baseline Survey of the Proposed Ryst Kuil Uranium Project			
354680	HIA Phase 1	Lita Webley, David Halkett	30/11/2015	Heritage Impact Assessment: Proposed Uranium Mining and Associated infrastructure on portions of the farm Quaggasfontein and Ryst Kuil near Beaufort West in the Western Cape and De Pannen near Aberdeen in the Eastern Cape			
354681	AIA Phase 1	Lita Webley	30/11/2015	Archaeological Impact Assessment: Proposed uranium mining and associated infrastructure on portions of the farms Quaggasfontein and Ryst Kuil near Beaufort West in the Western Cape and De Pannen near Aberdeen in the Eastern Cape			
354683	PIA Phase 1	Bruce Rubidge	24/04/2008	Palaeontological study of the Rystkuil channel			
356853	PIA Phase 1	John Almond	01/05/2008	PALAEONTOLOGICAL IMPACT ASSESSMENT, DAMKOPPIE HOUSING DEVELOPMENT, BEAUFORT WEST (WESTERN CAPE)			
357439	AIA Phase 1	Dave Halkett	01/09/2009	AN ARCHAEOLOGICAL ASSESSMENT OF URANIUM PROSPECTING ON PORTIONS 1, 3 AND 4 OF THE FARM EERSTE WATER 349, AND REMAINDER OF THE FARM			



				Power dates with most of the
				RYST KUIL 351, BEAUFORT WEST
406266	AIA Phase 1	Peter Nilssen	07/06/2010	Scoping Archaeological Impact Assessment: Proposed Beaufort West N1 Wind Energy Farm: 2/158 Lemoenkloof, RE 9/161 Kuilspoort, RE 162 Suid-lemoensfontein and RE 1/163 Bulskop, Beaufort West, Western Province
406299	HIA Phase 1	Stefan de Kock	01/10/2011	HERITAGE IMPACT ASSESSMENT: PROPOSED N1 WIND FARM PROJECT: LEMOENFONTEIN 158/2, KUILSPOORT 161/9, LEMOENFONTEIN SOUTH 162/REM & BULSKOP 163/1, BEAUFORT WEST DISTRICT
503074	Heritage Scoping Report	ACO	01/04/2013	Heritage impact assessment (scoping level) of the proposed Aberdeen to Droegrivier 400 kV transmission line Western Cape Province (Central Karoo District) Eastern Cape Province (Kakadu District)
503083	HIA Phase 1	ACO	04/08/2011	HERITAGE ASSESSMENT OF THE PROPOSED UPGRADE TO THE STORMWATER AND RETENTION FACILITIES AT BEAUFORT WEST, WESTERN CAPE
503102	PIA Phase 1	Jennifer Botha-Bri nk	04/07/2011	PALAEONTOLOGICAL IMPACT ASSESSMENT OF THE PROPOSED UPGRADE TO THE STORMWATER AND DETENTION FACILITIES IN HILLSIDE, BEAUFORT WEST, WESTERN CAPE
503109	HIA Phase 1	Jayson Orton	07/07/2011	HERITAGE IMPACT ASSESSMENT FOR A PROPOSED PHOTO-VOLTAIC FACILITY ON STEENROTS FONTEIN 168/1, BEAUFORT WEST MAGISTERIAL DISTRICT, WESTERN CAPE
503116	Desktop PIA	John E. Almond	01/06/2011	PALAEONTOLOGICAL IMPACT ASSESSMENT: DESKTOP STUDY. Proposed Photovoltaic Power Facility, Farm Steenrotsfontein 168, Beaufort West Municipality, Western Cape Province
503201	AIA Phase 1	Peter Nilssen	15/09/2014	Scoping Archaeological Impact Assessment: Proposed development of the Droërivier Solar Facility, on Portion 55 of Farm 168 Steenrotsfontein and a portion of Portion 10 of Farm 170 Weltevreden, Beaufort West, Western Cape Province
503202	Heritage Statement	Stefan de Kock	01/06/2011	NOTICE OF INTENT TO DEVELOP (NID) & HERITAGE STATEMENT IN TERMS OF SECTION 38(8) OF THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT 25 OF 1999): BEAUFORT WEST PHOTOVOLTAIC PARK KUILSPOORT 161/9 & LEMOENFONTEIN



				SOUTH 162/REM, DISTRICT BEAUFORT WEST
503231	AIA Phase 1	Peter Nilssen	25/05/2011	Scoping Archaeological Impact Assessment: Proposed Beaufort West Photovoltaic Power Station (Solar): southern portion of properties; 2/158 Lemoenkloof, RE 9/161 Kuilspoort, RE 162 Suid-lemoensfontein and RE 1/163 Bulskop, Beaufort West, Western Province
503273	Desktop PIA	John E. Almond	01/06/2011	PALAEONTOLOGICAL IMPACT ASSESSMENT: DESKTOP STUDY: Proposed Photovoltaic Power Station, Beaufort West Municipality, Western Cape
503276	HIA	Stefan de Kock	01/11/2011	INAL INTEGRATED HERITAGE IMPACT ASSESSMENT COMPILED IN TERMS OF SECTION 38(8) OF THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT 25 OF 1999). PROPOSED PHOTOVOLTAIC PARK: KUILSPOORT 161/9, LEMOENFONTEIN SOUTH 162/REM & BULSKOP 163/1, DISTRICT BEAUFORT WEST
504763	AIA Phase 1	Peter Nilssen	15/09/2014	Scoping Archaeological Impact Assessment Proposed development of the Droërivier Solar Facility, on Portion 55 of Farm 168 Steenrotsfontein and a portion of Portion 10 of Farm 170 Weltevreden, Beaufort West, Western Cape Province





APPENDIX 1: Archaeological Assessment (2021)



APPENDIX 2: Palaeontological Assessment (2021)



APPENDIX 3: Cultural Landscape Assessment (2021)



APPENDIX 4: Heritage Screening Assessment, NID and NID Response



APPENDIX 5: Results of PPP