

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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Enquiries: Sityhilelo Ngcatsha
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CaseID: 17402

Date: Monday February 28, 2022
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Final Comment

In terms of Section 38(8), 38(4) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Neels Kruger

ARCHAEOLOGICAL IMPACT ASSESSMENT (AIA) ON PORTIONS OF THE FARM BLOMSKRAAL 216 FOR THE PROPOSED VIRGINIA 3 SOLAR PARK EIA PROJECT, LEJWELEPUTSWA DISTRICT MUNICIPALITY, FREE STATE PROVINCE

AGES Limpopo (Pty) Ltd was appointed by Volans Energy (Pty) Ltd. to undertake the Environmental Authorisation (EA) Application for the establishment of a Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW and associated infrastructure and structures (Virginia 3 Solar Park) on the Farm Blomskraal 216 and Ventersburg Road, located within the Matjhabeng Local Municipality, Free State Province (14/12/16/3/3/2/2101)

The Final Scoping Report (FSR) was submitted in terms of the National Environmental Management Act (Act no. 107 of 1998) and the NEMA EIA Regulations 2014. The footprint (fenced area) of the proposed development is approximately 247 ha in extent.

Exigo Sustainability, Prof Bruce Rubidge and Dr Marc Van den Brandt were appointed to provide heritage specialist input as part of the EA application as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Rubidge, B and Van den Brandt, M. 2021. Palaeontological Impact Assessment (PIA) Blomskraal 216, Lejweleputswa District Municipality, Free State Province (Virginia 1, Virginia 2, Virginia 3 Solar Parks, and Power Line Corridor)

The development area is underlain by the Adelaide Subgroup of the Lower Beaufort Group and Jurassic dolerite and overlain mostly by Quaternary alluvial deposits. Outcroppings of the Beaufort Group and the Quaternary alluvial deposits did not reveal any fossils and it is therefore recommended from a palaeontological perspective, the proposed development should proceed. A Chance Find protocol is attached to be applied if fossils are exposed in the process of development.

Recommendations



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- The proposed development must be constrained to the flat, non-irrigated grassland, that covers the majority of the farm, currently serving as cattle and game farming land and the irrigated cropland in the northwest and northeast sections of the farm, currently growing maize/corn.
- No go areas due to palaeontological sensitivity includes the north-south Maselspruit River, the three east-west erosional gullies or tributary streams, west of the Maselspruit River and the south-east running erosional gully or tributary stream, east of the Maselspruit River.

Kruger, N. 2021. Ages Limpopo: Proposed Virginia 1, 2 & 3 Solar Parks EIA Project On Portions Of The Farm Blomskraal 216, Lejweleputswa District Municipality, Free State Province Archaeological Impact Assessment

A number of heritage resources were discovered during the survey within the development footprint, these include an Iron Age Farmer Representations (Exigo-VSP-IA01) of is of medium significance, Historical Period settlements and farmsteads (Exigo-VSP-HP01, Exigo-VSP-HP02, Exigo-VSP-HP03, Exigo-VSP-HP04, Exigo-VSP-HP05) with heritage significance ranging from medium to medium-low significance. These are located outside of the development area. Site Exigo-VSP-HP06 is a Historical Period settlements with a low heritage significance which falls within the development area. Burial sites (Exigo-VSP-BP01, Exigo-VSP-BP02, Exigo-VSP-BP03) of high significance were discovered on the site. Site Exigo-VSP-BP02 occurs some distance from the proposed project development areas and impact on the site is unlikely but potential indirect impacts to the site should be monitored.

Recommendations

- Sites Exigo-VSP-IA01 is located outside the proposed Virginia Solar Park project areas and it is primarily recommended that a heritage conservation buffer of at least 100m around the heritage receptor must be implemented.
- Site Exigo-VSP-HP06 must be monitored by an informed ECO in order to avoid long-term and indirect impacts on the sites or the destruction of previously undetected heritage remains and potential human burials.
- It is recommended for sites Exigo-VSP-HP01 - Exigo-VSP-HP05 that they be monitored by an informed ECO in order to avoid long-term and indirect impacts on the sites or the destruction of previously undetected heritage remains.
- Sites Exigo-VSP-BP01 and Site Exigo-VSP-BP03 must be closely monitored by an informed ECO in

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order to detect direct or indirect impact on these sites. A conservation buffer of 50m should be observed around the sites and a Site Management Plan (SMP) should be implemented, detailing these conservation measures and indicating responsible parties in this regard. In addition, it is advisable to erect fences around the burial sites and to implement access control to the sites.

- As burials have been located on the project property, it is recommended that the EIA public participation and social consultative process address the possibility of further graves occurring in the project area.
- Considering the localised nature of heritage remains, the general monitoring of the development progress by an ECO or by the heritage specialist is recommended for all stages of the project. Should any subsurface palaeontological, archaeological or historical material, or burials be exposed during construction activities, all activities should be suspended and the archaeological specialist should be notified immediately.
- It should be stated that it is likely that further undetected archaeological remains might occur elsewhere in the Study Area along water sources and drainage lines, fountains and pans would often have attracted human activity in the past. Also, since Stone Age material seems to originate from below present soil surfaces in eroded areas, the larger landscape should be regarded as potentially sensitive in terms of possible subsurface deposits. Burials and historically significant structures dating to the Colonial Period occur on farms in the area and these resources should be avoided during all phases of construction and development, including the operational phases of the development.
- As Palaeontological remains occur where bedrock has been exposed, all geological features should be regarded as sensitive.
- Water sources such as drainage lines, fountains and pans would often have attracted human activity in the past. As Stone Age material occur in the larger landscape, such resources should be regarded as potentially sensitive in terms of possible subsurface deposits.

SAHRA issued an interim comment dated 22/09/2021 which requested the submission of the draft EIA long with its appendices. The Final EIA was subsequently submitted to the case on the 24/02/2022.

Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA. As the Final EIA has been submitted without including comments from SAHRA, this comment must be forwarded directly to the

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competent authority. Proof of delivery and receipt thereof must be uploaded to the application

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) has no objections to the development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development;
- 38(4)c(i) – 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 or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Sityhilelo Ngcatsha/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Ngqalabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA for offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
 - The Environmental Authorisation (EA) must be submitted to SAHRA for record purposes.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

**AIA FOR THE PROPOSED VIRGINIA 3 SOLAR PARK EIA PROJECT,
LEJWELEPUTSWA DISTRICT MUNICIPALITY, FREE STATE PROVINCE**

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Sityhilelo Ngcatsha
Archaeology, Palaeontology, Meteorite Assistant
South African Heritage Resources Agency

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/587809>