

16 February 2023

Ref: 684HIA-001

TerraManzi Group (Pty) Ltd
13 Old Cape Farm Road,
Crofters Valley,
Noordhoek,
7975

Attention: Wendy Mey

PART 2 ENVIRONMENTAL AUTHORISATION (EA) AMENDMENT PROCESS FOR GN R. 982/983 FOR THE 147 MW BRANDVALLEY WIND ENERGY FACILITY NORTH OF THE TOWN OF MATJIESFONTEIN WITHIN THE KAROO HOOGLAND, WITZENBERG AND LAINGSBURG LOCAL MUNICIPALITIES IN THE WESTERN AND NORTHERN CAPE PROVINCE – HERITAGE SPECIALIST OPINION

1. INTRODUCTION

PGS Heritage (Pty) Ltd (PGS), a heritage specialist consultancy, was requested to evaluate the proposed layout changes to the Brandvalley Wind Energy Facility (DFFE Reference No.: 14/12/16/3/3/2/900). The original Heritage Impact Assessment, walkdown and Heritage Management Plan were completed by Booth Heritage Consultants (2016) and CTS Heritage (2021).

2. PROJECT DESCRIPTION

Brandvalley Wind Farm (Pty) Ltd (BWF), was issued with an Environmental Authorisation (EA) for the proposed Brandvalley Wind Energy Facility close to Matjiesfontein in the within the Karoo Hoogland, Witzenberg and Laingsburg Local Municipalities in the Western and Northern Cape Province on 23 November 2018 (DFFE Reference No.: 14/12/16/3/3/2/900).

After the issuing of the original EA in November, the following amendments have been undertaken and granted for the authorised SEF:

- 2019/02/14: Name Change, hub and rotor diameter and generation capacity Amendment: 14/12/16/3/3/2/900AM1
- 2021/10/11: Extension of validity: 14/12/16/3/3/2/900AM2
- 2022/08/23: Various layout changes as well as EMPR approval: 14/12/16/3/3/2/900AM3

3. SPECIALISTS' TERMS OF REFERENCE

- A detailed motivation as to why the Department should consider the change in layout.
- The status (baseline) of the environment (social and biophysical) that was assessed during the initial assessment (by the relative specialist, if applicable);
- The current status of the assessed environment (social and biophysical) (by the relative specialist, if applicable).
- A review of all specialist studies undertaken and a detailed assessment, including a site verification report indicating the status of the receiving environment (by the relative specialist, if applicable);
- The terms of reference for the specialist reports and declaration of interest of each specialist must be provided.
- The report mentioned above, must indicate if the impact rating as provided in the initial assessment remains valid; if the mitigation measures provided in the initial assessment are still applicable; or if there are any new mitigation measures which need to be included into the EA, should the request to extend the commencement period be granted by the Department.
- An indication if there are any new assessments/guidelines which are now relevant to the authorised development which were not undertaken as part of the initial assessment, must be taken into consideration and addressed in the report.
- A description and an assessment of any changes to the environment (social and biophysical) that has occurred since the initial EA was issued;
- A description and an assessment of the surrounding environment, in relation to new developments or changes in land use which might impact on the authorised project, the assessment must consider the following:
 - similar developments within a 30km radius.
 - Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.
 - Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
- The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
- A cumulative impact environmental statement on whether the proposed development must proceed.

4. ANY NEW GUIDELINES/ PROTOCOLS

None

5. CURRENT BASELINE HERITAGE STATUS

Since the original assessment, the baseline heritage environment has remained the same. Findings relating to cultural heritage and palaeontology (2016, 2021, 2022) for the project are still applicable.

6. PROPOSED CHANGES

The following amendments are proposed to the Authorised Brandvalley WEF as part of this Part 2 Amendment Process:

- The layout map approved as part of AM3 (14/12/16/3/3/2/900/AM3 dated 23 August 2022) did not include a GIS file with the exact positioning of the final layout, and which is now contained in this Part 2 AA.
- We have reviewed the final road alignment and consider the changes minor and insignificant, with the only areas around sections **B2** (Refer to **Figure 1** to **Figure 3**); and,
- Additionally, section **B11** will have a portion of the ring road dropped as this is no longer required by the Applicant (Refer to **Figure 4** to **Figure 6**).
- Finally, section **B16** will entail the realignment of the original southern access alignment on roof B16 in favour of a more linear alignment that avoids steep slope access (Refer to **Figure 7** to **Figure 9**).



Figure 1 - Original layout as approved Road B2



Figure 2 - Original layout and proposed layout change



Figure 3 - Proposed new layout around road B2



Figure 4 - Original layout as approved Road B11



Figure 5 - Original layout and proposed layout change for roads B11



Figure 6 - Proposed new layout and removal of the ring road option for road B11



Figure 7 - Original layout as approved Road B16



Figure 8 - Original layout and proposed layout change for roads B16

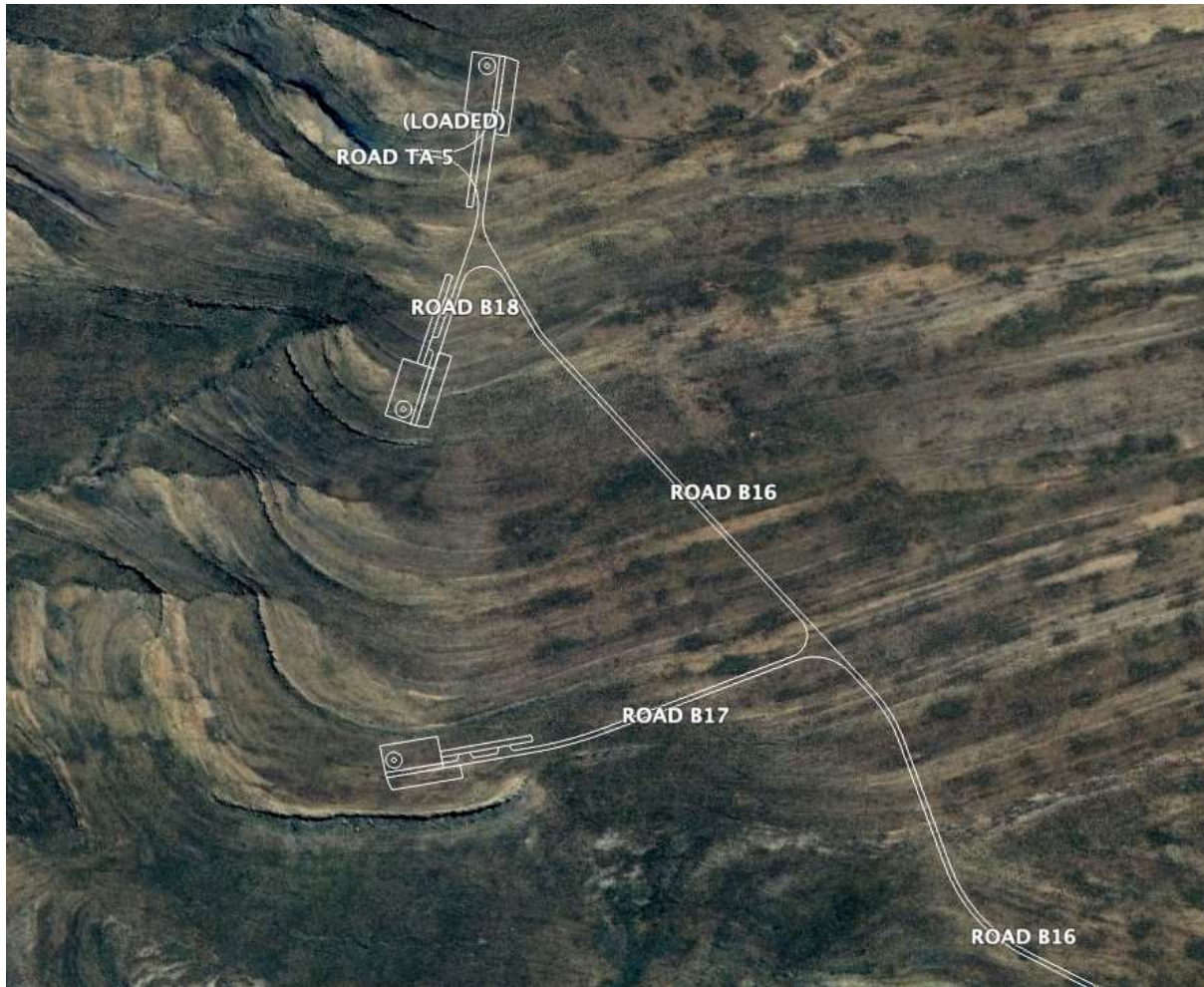


Figure 9 - Proposed new layout and removal of the southern road option for road B16

7. SPECIALIST COMMENT

Our evaluation of the original HIA and subsequent documentation (AM1-3 documents, EMPR and Cultural Management Plan (CHMP)) has shown that we envisaged the projected impact to remain the same.

We have further evaluated the cumulative impact related to the number of other proposed wind and solar renewable projects in the vicinity of the approved Brandvalley Facility.

The reduction in the number of turbines will reduce the negative cumulative load on heritage resources within the larger project area.

The management measures as included in the HIA, EMPR and CHMP(2016, 2021 and 2022) remain true and need to be implemented and are listed below:

8. CONCLUSION

It is our considered opinion that the proposed footprint changes after the conclusion of the EMPr for the Brandvalley WEF will not have any additional impacts on the heritage resources inventory identified for the project as part of the original heritage studies. Implementation of a final walkdown for the changes in footprint will address the need for site-specific mitigation for discovered heritage resources.

Any enquiries can be submitted to Wouter Fourie at wouter@pgsheritage.com.



Wouter Fourie

Accredited Professional Heritage Practitioner (APHP), Accredited Professional Archaeologist (ASAPA)

Director – PGS Heritage

APPENDICES

Appendix 1: Specialists declaration of Interest (signed by a Commissioner of Oaths)

Appendix 2: Specialist CVs

Appendix 1: Specialists declaration of Interest (signed by a Commissioner of Oaths)

Appendix 2: Specialist CVs



WOUTER FOURIE

Professional Heritage Practitioner

PROFILE

I am involved in heritage resources management for the past 20 years acting as a specialist consultant on various high-profile projects involving heritage and archaeology. I aim to develop tailor-made heritage solutions to the mining, water and oil and gas industries. I have worked in various African countries, including South Africa, Lesotho, Mozambique, Mauritius, Malawi and the DRC.

I thrive on developing and implementing heritage projects in new territories and with these securing local partnerships that enable skill development for local graduates.

CONTACT

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EDUCATION

University of Pretoria

1993-1996

BA Degree - Majors in Archaeology, Anthropology and Geography

University of Pretoria

1997

BA Hon Archaeology, with further specialisation in environmental management.

University of Cape Town

2016 - present

MPhil Conservation of the Built Environment

WORK EXPERIENCE

PGS Heritage Group of Companies - Director - Heritage Specialist

2003- present

I am actively involved in the management of the business and focus on marketing and new business for PGS, specifically the broader SADC region. Acting as heritage specialist in multidisciplinary teams

The University of the Witwatersrand - Project Manager - Archaeological Contracts Unit

2007-2008

Responsible for conducting heritage and archaeological impact studies, archaeological excavations and general management of the unit

Matakoma Consultants - Director - Heritage Specialist

2000 - 2008

Heritage specialist and Director responsible for heritage and archaeological impact studies

Randfontein Estate Gold Mine - Environmental Coordinator

Oct 1998- Feb 2000

Coordinating all environmental Rehabilitation work

Department of Minerals and Energy Environmental Officer

Oct 1997 - Sept 1998

PROFESSIONAL AFFILIATION

Accredited Professional Heritage Practitioner

Association of Professional Heritage Practitioners
Since 2014

Accredited Professional Archaeologist

Association of Southern African Professional Archaeologists -
Since 2001