

24 July 2023

Ref: 728HIA-004_03

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

Attention: Tarryn Frankland**EMPR AMENDMENT APPLICATIONS FOR THE APPROVED VIRGINIA OHPL - DFFE REF: 14/12/16/3/3/1/2444 (DATED 21 FEBRUARY 2022) – HERITAGE SPECIALIST OPINION****1. INTRODUCTION**

PGS Heritage (Pty) Ltd (PGS), a heritage specialist consultancy, was requested to evaluate the layout of the approved Virginia 1 Solar PV Park - DFFE Ref: 14/12/16/3/3/1/2444 (dated 21 February 2022) as well as the Environmental Management Plan Report (EMPR). The original Archaeological Impact Assessment (AIA), was completed by Exigo Sustainability for Ages Limpopo, in 2021, while the EMPR was completed by the TerraManzi Group (2021).

2. PROJECT DESCRIPTION

The Virginia 1 Solar Park, was issued with an Environmental Authorisation (EA) on 21 February 2022 (DFFE Reference No.: 14/12/16/3/3/1/2444).

3. ANY NEW GUIDELINES/ PROTOCOLS

None

4. CURRENT BASELINE HERITAGE STATUS

Since the original assessment, the baseline heritage environment has remained the same. Findings relating to cultural heritage (2021) for the project are still applicable as no additional development was completed.

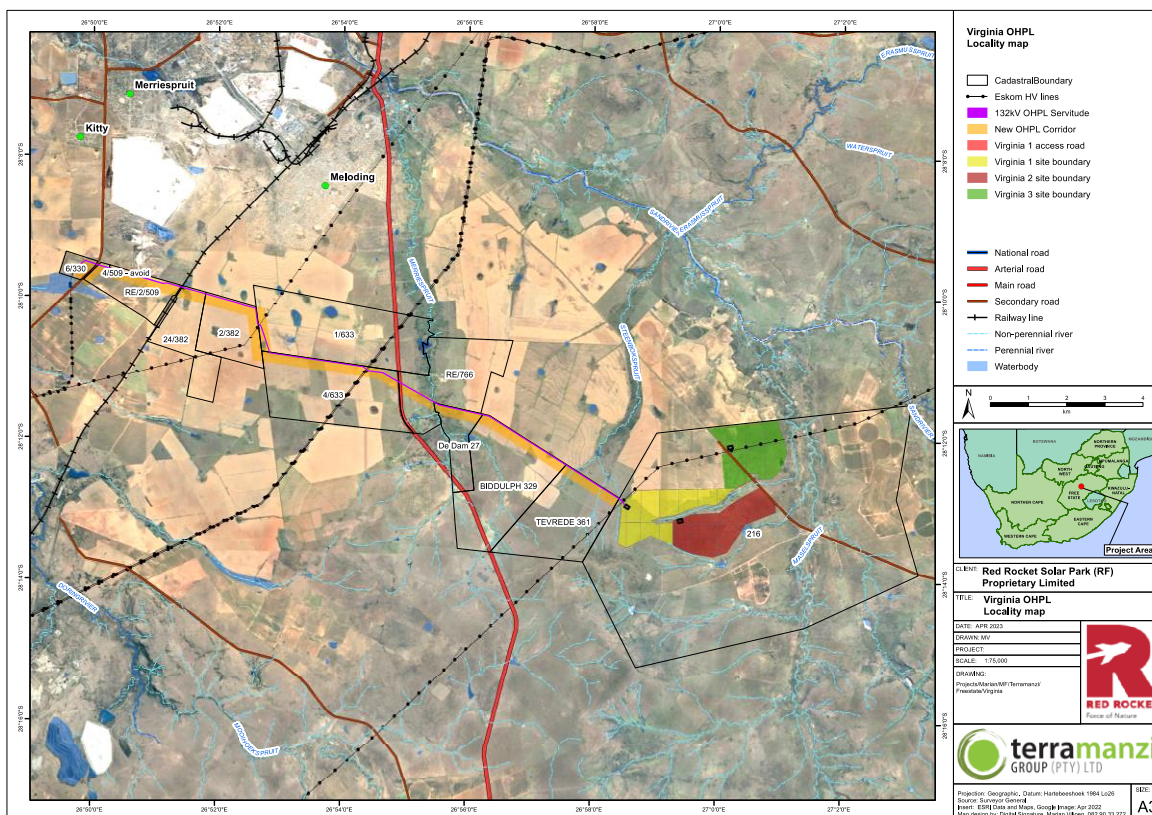


Figure 1 - Locality and layout of the Red Rocket Virginia SEF Suite of projects

5. PROPOSED CHANGES

The scope of the specialist evaluation was to consider:

- Update the Generic Substation EMPR and ensure all specialist recommendations are included

6. SPECIALIST COMMENT

Our evaluation of the original AIA (2021) and the EMPR indicates that the receiving cultural heritage environment will not experience a change in the original impact rating. The following general observations:

- One historical heritage resource (Exigo-VSPL-HP01) was identified within the OHPL corridor (Figure 2 and Figure 3). Numerous concrete and brick foundations and ash middens characterised the area. According to the AIA, the structures were associated with farmworker homesteads concentrated in the area. This was confirmed in the analysis of the historical maps and aerial photographs (Kruger, 2021: 37). The AIA rates the area and heritage structures as having a low heritage significance.
- The OHPL route and layout will be updated to align with the current Environmental Authorisation.



Figure 2 – OHPL corridor with the delineated heritage-sensitive area in the centre of the map

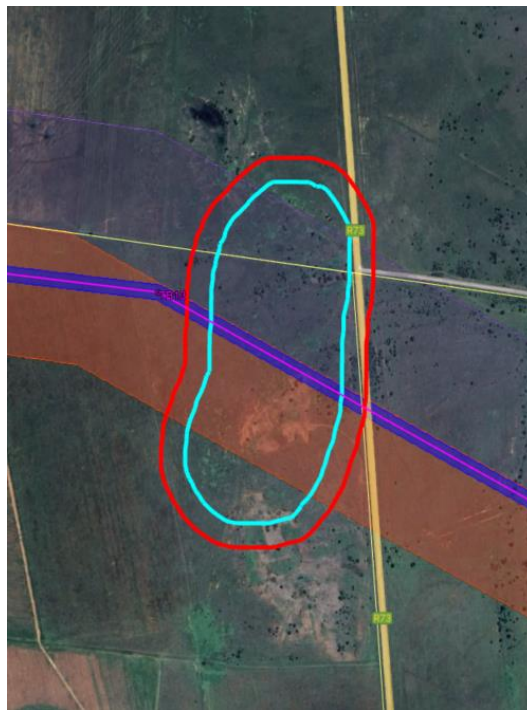


Figure 3 – Delineated area with various heritage resources (blue) with 20m buffer (red)

A senior archaeologist from PGS assessed the delineated area on 20 July 2023 (**Figure 4**). During the field assessment, various individual heritage features were identified and assessed (**Figure 5**).

Several heritage-sensitive features were discovered within the assessment corridor that passes through the original heritage-sensitive area at Exigo-VSPL-HP01, including a range of recent historic middens and the remains of both square and round foundations. These findings suggest that the area was once used as a living area, most likely associated with the homesteads of black farm labourers. A single burial ground with two stone-packed graves was also identified (VOHPL-013).

Further analysis and experience have shown that farm worker homesteads have a high possibility of unmarked and stillborn graves associated with dwellings and ash middens.

Figure 6 indicates the delineation of the heritage-sensitive areas based on fieldwork and aerial photography. It is recommended that the indicated areas are avoided during construction by designing the pylon placement in such a manner as to span or avoid the sensitive areas and reroute the services road around the heritage-sensitive area.

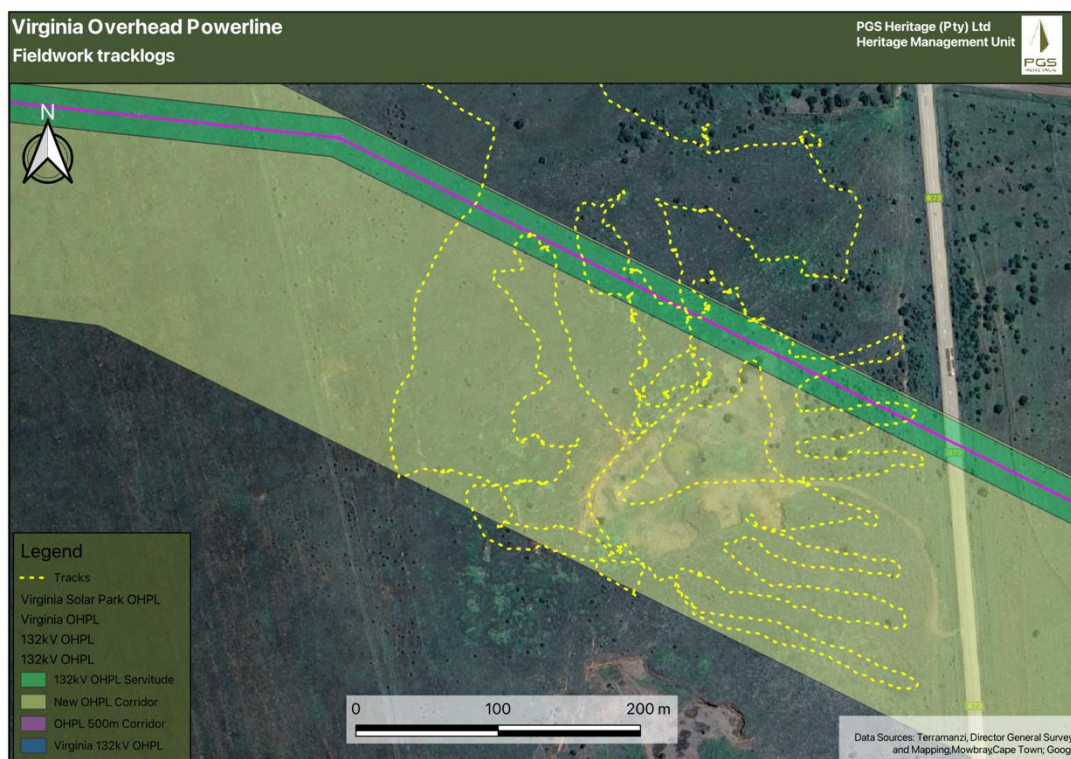


Figure 4 – Field survey activity logged via GPS in the assessment area.

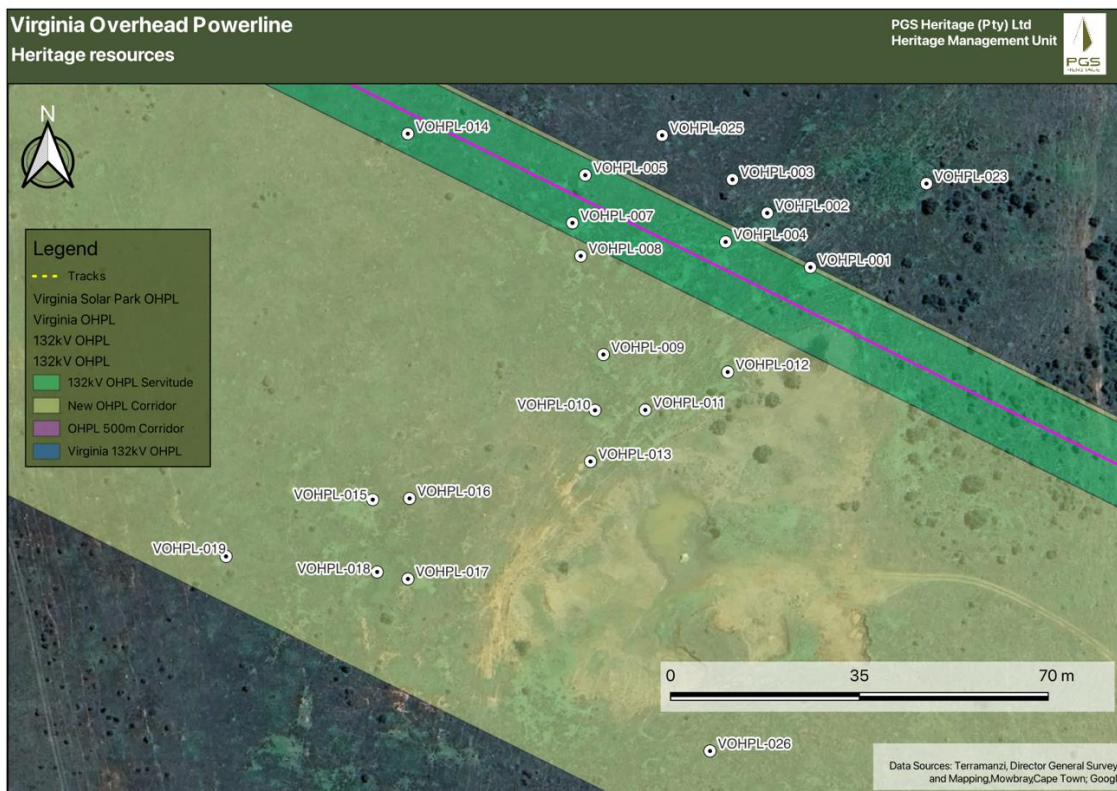


Figure 5 – Identified heritage resources within the assessment area.

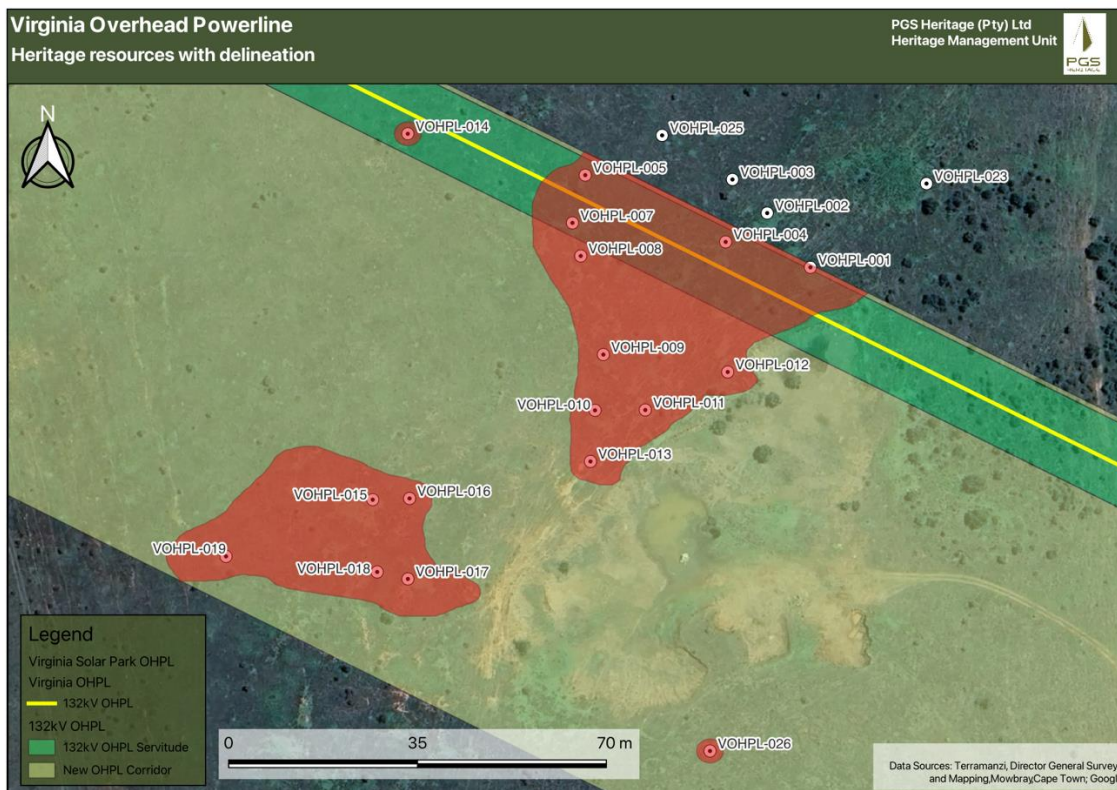


Figure 6 – Delineated heritage-sensitive areas

The following management recommendations in the AIA and recommendation for inclusion in the updated EMPR is listed in **Table 1**.

Table 1 – Heritage Resources Management recommendations contained in the original report as well as the recommendations based on the assessment of the AIA by PGS for inclusion in the EMPR

AIA Report	For EMPR inclusion
<p>The site (Exigo-VSPL-HP01) is poorly preserved, of medium-low significance:</p> <ul style="list-style-type: none"> • application should be made for the necessary destruction permit from the relevant Heritage Resources Authorities should the site, or parts thereof be impacted on by the construction of monopoles, pylons or other infrastructure. • Should the site be retained, it is advisable to observe a 20m conservation buffer around the site. • Generally, the sites should be monitored by an informed ECO in order to avoid the destruction of previously undetected heritage remains and potential human burials which might occur at the site. <p>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.</p> <p>It should be stated that it is likely that further undetected archaeological remains might occur</p>	<p>The site (Exigo-VSPL-HP01) is poorly preserved, of medium-low significance. Considering the delineation done during the recent fieldwork by PGS the following measures are recommended:</p> <ul style="list-style-type: none"> • It is recommended that the indicated area (as per Figure 6) is avoided during construction by designing the pylon placement in such a manner as to span or avoid the site and reroute the services road around the heritage-sensitive area. • While working close to these heritage features they must be delineated with a 10-meter no-go buffer and construction monitored by the ECO. • During stringing no vehicle must travel through the site but utilise the rerouted service road. • Guide ropes can be taken through the site on foot during stringing. • If the structures within the sensitive areas cannot be avoided: <ul style="list-style-type: none"> ○ A consultation process to investigate the presence of stillborn and unmarked graves should be followed; ○ If during the consultation process, it is determined that there are burials present a grave relocation process must be initiated. ○ Upon completion of the relocation process construction can commence.

AIA Report	For EMPR inclusion
<p>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.</p> <p>Site Monitoring: Site monitoring by the heritage consultant or an ECO familiar with the heritage occurrences of the site.</p>	<ul style="list-style-type: none"> ○ The site must be monitored during construction on the site by an archaeologist to identify and mitigate any potential archaeological finds or previously unidentified burials that can potentially be unearthed during construction work. ○ application should be made for the necessary destruction permit from the relevant Heritage Resources Authorities should the site, or parts thereof be impacted on by the construction of monopoles, pylons or other infrastructure. <p>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.</p> <p>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</p>

AIA Report	For EMPR inclusion
	<p>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.</p> <p>Site Monitoring: Site monitoring by the heritage consultant or an ECO familiar with the heritage occurrences of the site.</p>

7. CONCLUSION

We have assessed the recommendations in the AIA and conducted a follow up field survey around the heritage-sensitive areas (Exigo-VSPL-HP01). We are satisfied that the additional recommendations will address any potential impact on heritage resources that can potentially emanate from the project.

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

Reference

Kruger, N. 2021. Archaeological Impact Assessment for the proposed Virginia 1, 2 & 3 Solar Parks EIA Project on Portions of the Farm Blomskraal 216 in the Lejweleputswa District Municipality of the Free State Province. Exigo Sustainability

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