Phase 2a Heritage Monitoring (Interim Report 1) -

# UMOYILANGA-DASSIESRIDGE WIND ENERGY FACILITY (WEF), KARIEGA, SUNDAYS RIVER VALLEY LOCAL MUNICIPALITY, NELSON MANDELA BAY METROPOLITAN MUNICIPALITY, EASTERN CAPE

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DATE – 10 OCTOBER 2023



### **SPECIALIST DECLARATION OF INTEREST**

#### I, Karen van Ryneveld, ArchaeoMaps, declare that:

- o I act as independent heritage specialist in this application.
- o I do not have any financial or personal interest in the application, its proponent, or subsidiaries, aside from fair remuneration for specialist services rendered.
- o I am suitably qualified, accredited, and experienced to act as independent specialist in this application.
- o Work is conducted in an objective manner; circumstances that may have compromised work is reported on.
- $\circ \qquad \text{All material information collected for purposes of this application are transparently reported on}.$
- o Work is done in accordance with relevant heritage legislation, regulations, and policy guidelines, and with cognisance to environmental legislation, regulations, and policies, including the principle of Integrated Environmental Management (IEM).

Lagrandila

SIGNATURE – 10 OCTOBER 2023

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Phase 2a Heritage Monitoring (Interim Report 1) -

# UMOYILANGA-DASSIESRIDGE WIND ENERGY FACILITY (WEF), KARIEGA, SUNDAYS RIVER VALLEY LOCAL MUNICIPALITY, NELSON MANDELA BAY METROPOLITAN MUNICIPALITY, EASTERN CAPE

#### **EXECUTIVE SUMMARY**

#### PROJECT NAME AND LOCALITY

Umoyilanga-Dassiesridge Wind Energy Facility (WEF), Kariega, Sundays River Valley Local Municipality, Nelson Mandela Bay Metropolitan Municipality, Eastern Cape.

- General site co-ordinate: \$33°35′29.2"; E25°30′18.5"
- 1:50,000 map ref: 3325CB and 3325DA

#### **INTERIM REPORT 1**

EDF Renewables intends to construct and operate the Umoyilanga–Dassiesridge WEF, comprising a 16-wind turbine development (and related infrastructure), with lease areas on the properties Farm 11/185 (Elands Hoorn), Farm 187 (Grassridge), Farm 188 (Gringley), Farm 5/189 (Blauw Baadjies Vley), and Farm RE/189 (Blauw Baadjies Vley). As part of the Environmental Authorisation (EA)—including the Environmental Impact Assessment (EIA) and Environmental Management Programme (EMPr)—conditions, EDF Renewables appointed a Principal Contractor, Power Construction, to carry the construction activities on site, and an independent Environmental Control Officer (ECO), Indwe Environmental, to audit environmental compliance during the construction phase of the project. ArchaeoMaps has been appointed to ensure protection and care of heritage—environmental concerns during the construction phase of the project.

The purpose of this report is to report on heritage—environmental compliance pertaining to the construction phase of the project to date.

#### 1 Environmental (and heritage) induction

On 28 September 2023, Indwe Environmental conducted environmental induction for the project team at the EDF Renewables offices, Waterfront Business Park, Humerail, Gqeberha/Port Elizabeth. Due to time constraints, it was decided to prioritise a site visit—planned heritage–environmental induction was not conducted and will be rescheduled.

A project heritage protocol for incidental finds/chance finds procedure has not yet been done/finalised and must be prioritised.

#### 2 Monitoring of vegetation clearing

At the time of the site visit limited vegetation clearing had been done, and one archaeological site was uncovered.

#### 2.1 Site DR-S8 – Later Iron Age (LIA) – Workers' Cottage Remains and Graves – S33°34′39.3; E25°26′09.5"

The site comprises the stone remains of a workers' cottage and two graves. Both graves are stone outlined and earth filled graves, indicating a Later Iron Age (LIA) cultural grave identity. More graves may be present at the site, but time constraints did not allow a detailed site investigation during the site visit. The site most likely dates to the past 200 years.

Site DR-S8 is assigned a SAHRA *High/Medium Significance* and a *Generally Protected IV-A* field rating. Either site conservation, associated with realignment of Road 5 in the vicinity of the site, or Phase 2 mitigation (including a social consultation process) must precede any further development impact in the area. The developer is considering Phase 2 mitigation, because of the process and time frames involved in the authorisation of a road realignment. Based on the archaeological context of the site—the graves' confirmed association with the structure remains and, thus, a *sense of place* of belonging on the farm—it is recommended that reinternment at a farm locality be prioritised (pending the results of the consultation process). The Site DR-S2 conservation area is proposed as a suitable place for reinternment.

A temporary conservation fence must be erected around the site (~3–5m conservation buffer) and "No-go Area" signage attached thereto until the time that mitigation measures are set in place, be it road realignment and permanent conservation or Phase 2 mitigation. Phase 2 mitigation and grave relocation must be done under an ECPHRA permit.

#### 3 Upgrade of the "Service/Link Road" for use during the construction and operational phases of the project

The upgrade of the "Service/Link Road" comprises an approximate 6km in situ farm access road upgrade project [S/LR-W: S33°3605.5"; E25°30'05.5" to S/LR-E: S33°34'41.3"; E25°27'46.3"], to furnish a 5–7m in width road to be used during the construction and operational phases of the project. Infrequent lithic artefacts occurring across the extent of the study site do not warrant a SAHRA site significance rating. The road upgrade project will traverse the 20m conservation buffer at the Colonial Period Site DR-S2 farmstead, where it is proposed to form part of an amendment conservation area [see 4.1 Site DR-S2]. The palaeontological sensitive Voorstehoek Formation lies west of the study site and will not be impacted by the road upgrade project [see 6 Paleontological matters].

It is recommended that the "Service/Link Road" project proceeds without the developer having to comply with additional heritage compliance requirements. (Lithic occurrences can be destroyed during the course of the road upgrade project, without the developer having to apply for an ECPHRA site destruction permit).

#### 4 Previously identified and visited heritage resources/sites

#### 4.1 Site DR-S2 - Colonial Period - Farmstead - S33°35'37.7"; E25°29'45.6"

An amended conservation area for Site DR-S2 is proposed, accommodating the in situ "Service/Link Road" upgrade that traverses the required 20m site conservation buffer, yet providing suitable permanent conservation measures for the Karoo style farmstead. It is requested that ECPHRA approves the proposed amendment conservation area. It is the intention of EDF Renewables to finalise permanent conservation measures at the site during the early works phase of development.

#### 4.2 Site DR-F4 - Possible Human Burial Site - S33°35'51.7"; E25°30'35.2"

Site DR-F4 is typified by a partially whitewashed/white painted monolithic stone slab, inferred to be a headstone and, thus, signalling the locality of a possible human burial site; a 50m conservation buffer around the site was recommended (CES 2021, Kruger 2021). However, the site identification is questioned, and it is argued that the monolith represents a Colonial Period farm marker indicating direction to a farm locality. The different archaeological site interpretations have direct impact on the site's significance rating and, by implication, related recommendations.

At the time of the site visit a preliminary temporary conservation fence, with an approximate 1.5–1.8m conservation buffer, had been erected around the monolith. It is requested that ECPHRA approves the preliminary temporary conservation fence as suitable for development purposes. Should this request be granted, then "No-go Area" signage will be attached to the fence to finalise temporary conservation at the site during the early works phase of development.

Ground Penetrating Radar (GPR) and archaeological test pits were proposed as measures to verify the site's identity (CES 2021, Kruger 2021). It is requested that ECPHRA confirms whether site identification testing would be required, and if so, to stipulate testing requirements for project purposes.

#### 4.3 Site DR-F5 - Possible Human Burial Site - S33°36'36.3"; E25°29'47.3"

Site DR-F5, situated about 250m south-east of WTG-21, is described as a possible stone cairn–large grave site (Kruger 2021), comprising some 30–40 cairn features of rough circular, oval, and rectangular-based shapes scattered irregularly across the landscape. However, this site interpretation is questioned, and it is argued that the site designates a Colonial Period cultural landscape feature/occurrence where cairns resulted primarily, albeit not exclusively, from road clearance activity. Stone was not only used for private use but was also dealt in locally to support an earlier Karoo farming lifestyle.

The site is not inferred to be a stone cairn—large grave site; should the site, in fact, be a grave site, then it would be a *Type Site*—the DR-F5 site would be the first of its kind identified as a burial site, because no such burial pattern (unconformity of cairn base-shapes not designating any cosmological life/death belief system) has, as yet, been identified in South Africa.

It is, based on this incident site inspection report that designates the Site DR-F5 locality as a Colonial Period cultural landscape feature/occurrence, requested that ECPHRA:

- Withdraws their conservation requirements (conservation fencing with a 50m conservation buffer and signage) for the locality/site during the construction and operational phases of the project.
- Withdraws their development restriction beyond WTG-21 for the Umoyilanga-Dassiesridge WEF project. Should ECPHRA require archaeological site identification testing to do so, then it is requested that ECPHRA stipulates testing requirements for the site. Caution is drawn to the use of GPR on its own for site verification purposes, and its limited contribution in stone cairn site verification. In addition, based on the high unlikelihood of the site being a grave site, it

is requested that ECPHRA considers site identification as archaeological not grave verification—the public consultation process for purposes of site identification is not warranted at the site.

#### 5 Additional archaeological and cultural heritage matters

#### 5.1 Site DR-S1 - Colonial Period - Farmstead Remains - S33°36'09.1"; E25°26'38.0"

Site DR-S1, the Prentice Kraal 14/233 Colonial Period farmstead, is situated more than 2km from the nearest development aspect. The property Prentice Kraal 233 seems to be wholly excluded from the project authorisation (CES 2021). The site will, by implication (proximity to the study site and project authorisation), not be impacted on and will also not be reported on in follow-up interim monitoring reports.

#### 5.2 Site DR-F1 - Possible Human Burial Site - S33°34'51.7"; E25°27'01.9"

Due to time constraints identified Site DR-F1, near WTG-52a, was not visited during the site visit. The site will be reported on in a follow-up interim monitoring report. The site is described as comprising a number of circular and irregular stone cairns of varying sizes, placed irregularly on the landscape.

#### 5.3 Site DR-F2 - Possible Human Burial Site - S33°35'13.4"; E25°28'36.9"

Due to time constraints identified Site DR-F2 was not visited during the site visit. The site will be reported on in a follow-up interim monitoring report. The site is described as a stone cairn representing a possible human grave situated along the OHL line.

#### 5.4 Site DR-F3 - Possible Human Burial Site - S33°35'31.0"; E25°28'50.9"

Due to time constraints identified Site DR-F3, near WTG-28, was not visited during the site visit. The site will be reported on in a follow-up interim monitoring report. The site is described as comprising at least three elongated stone cairns of relatively uniform size. The cairns are interpreted as representing human burials.

#### 5.5 Site DR-F6 – Possible Historical Period Occupation Area – S33°34'28.7"; E25°28'21.5"

Due to time constraints identified Site DR-F6, near WTG-16, was not visited during the site visit. The site will be reported on in a follow-up interim monitoring report. The site is described as an ash and dung deposit near stone wall foundation structures, situated in a dense prickly pear stand, but with the likelihood of human burials at the site.

#### 5.6 Site DR-F7 - Possible Human Burial Site - S33°33'56.8"; E25°28'46.3"

Due to time constraints identified Site DR-F7, north of WTG-16/WTG-54[?], was not visited during the site visit. The site will be reported on in a follow-up interim monitoring report. The site is described as a single circular stone cairn, measuring approximately 1x1m in size.

#### 5.7 Monitoring of vegetation clearing with a specific focus on Stone Age resources/sites

Vegetation clearing in the vicinities of turbines WTG-01, WTG-08, WTG-16, WTG-63, and turbine line WTG-20–WTG-21 will be monitored with a specific focus on, albeit not limited to, Stone Age resources/sites.

### 5.8 The Colonial Period-contemporary infrastructure destruction list/register

Many a low to no heritage significance infrastructural aspect (built structures, mainly older than 60 years of age, including farm dams, water troughs, feed lots, etc.) are scattered about the site. Where necessary for project construction purposes, infrastructural aspects will be destroyed/demolished—an infrastructure destruction list/register will be kept.

#### 6 Paleontological matters

Only one of the initially two identified paleontological sensitive areas fall within the project footprint, namely the Voorstehoek Formation (in the WTG-08–WTG-63–WTG-67–WTG-20–WTG-52a region); the paleontological sensitive Alexandria, Kirkwood, and Sundays Formations area is situated east of the authorised site.

In addition to the Voorstehoek Formation sensitive area, all trench excavations of ≥1m deep will be monitored for possible fossil finds.

#### **HERITAGE MANAGEMENT NOTES:**

- 1. ECPHRA is the heritage consenting authority for development projects in the Eastern Cape.
- 2. The South African Heritage Resources Agency (SAHRA) does not have a mandate to comment on heritage for developments in the Eastern Cape, except where the development impacts, directly or indirectly (in close proximity), on a National (NHS) or World Heritage Site (WHS).
- 3. Heritage management across South Africa, whether managed by SAHRA or a Provincial Heritage Resources Authority (PHRA)—being the ECPHRA in the Eastern Cape—follows the same basic procedure as described in the:
  - o National Heritage Resources Act, Act No. 25 of 1999 (NHRA 1999).
  - o NHRA 1999 Regulations 2000 No. 21239 (permitting process).
  - o SAHRA. 2007. Minimum standards: archaeological and palaeontological components of impact assessment reports.
- 4. Across South Africa heritage is managed via the online South African Heritage Resources Information System (SAHRIS).

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EDF Renewables intends to construct and operate the *Umoyilanga–Dassiesridge Wind Energy Facility (WEF), Kariega, Sundays River Valley Local Municipality, Nelson Mandela Bay Metropolitan Municipality, Eastern Cape.* As part of the EA—including the EIA and EMPr—conditions, EDF Renewables appointed a Principal Contractor, Power Construction, to carry the construction activities on site, and an independent ECO, Indwe Environmental, to audit environmental compliance during the construction phase of the project. ArchaeoMaps has been appointed to ensure protection and care of heritage—environmental concerns during the construction phase of the project.

The Umoyilanga–Dassiesridge WEF comprises a 16-wind turbine development (and related infrastructure), with lease areas on the properties Farm 11/185 (Elands Hoorn), Farm 187 (Grassridge), Farm 188 (Gringley), Farm 5/189 (Blauw Baadjies Vley), and Farm RE/189 (Blauw Baadjies Vley). The project is briefly—according to wind turbine localities—summarised as:

UMOYILANGA-DASSIESRIDGE WEF TURBINE SUMMARY					
NUMBER	WTG NAME	CO-ORDINATES			
1	WTG-65	S33°34′08.3"; E25°29′27.2"			
2	WTG-12	S33°34′03.1″; E25°29′06.0″			
3	WTG-54	S33°33′59.7"; E25°28′46.6"			
4	WTG-16	S33°34′29.8″; E25°28′23.8″			
5	WTG-01	S33°35′31.9″; E25°30′33.6″			
6	WTG-64	S33°34′52.3″; E25°27′32.0″			
7	WTG-30	S33°36′06.4″; E25°31′05.5″			
8	WTG-08	S33°34′14.5″; E25°26′53.9″			
9	WTG-60	S33°36′05.9"; E25°30′44.0"			
10	WTG-61	S33°36′06.3"; E25°30′24.4"			
11	WTG-63	S33°34'17.2"; E25°26'15.1"			
12	WTG-25	S33°36′01.5″; E25°30′02.2″			
13	WTG-52a	S33°34′48.4″; E25°27′08.8″			
14	WTG-20	S33°34′53.5″; E25°26′47.8″			
15	WTG-67	S33°34′48.3″; E25°26′28.1″			
16	WTG-21	S33°36′28.5″; E25°29′57.9″			

Table 1: Umoyilanga–Dassiesridge WEF turbine summary

The heritage compliance history of the project is briefly—according to heritage and heritage related reports, corresponding to the EIA process—summarised as:

- CES. 2021. Finalisation of the Environmental Management programme (EMPr) Umoyilanga–Dassiesridge
   Wind Energy Facility near Kariega, Eastern Cape Province.
- Kruger, N. (Exigo). 2021. CES: Report on micrositing and ground truthing for the proposed Dassiesridge wind energy facility project, Cacadu District Municipality, Eastern Cape Province.
- Kruger, N. (Exigo). 2020a. CES: Proposed Dassiesridge BESS development project on a portion of the farm
   Grassridge 187, Cacadu District Municipality, Eastern Cape Province. Archaeological Impact Assessment.
- Kruger, N. (Exigo). 2020b. CES: Proposed Dassiesridge CTMF development project on a portion of the farm Blauw Baadjies Vley 189, Cacadu District Municipality, Eastern Cape Province. Archaeological Impact Assessment.

- Almond, J.E. (Natura Viva). 2014. Palaeontological specialist assessment: combined desktop and fieldbased study. Proposed Dassiesridge Wind Energy Facility near Uitenhage, Cacadu District, Eastern Cape.
- Van Ryneveld, K. (ArchaeoMaps) 2014. Phase 1 archaeological and cultural heritage impact assessment the Dassiesridge Wind Energy Facility (WEF), between Kirkwood and Uitenhage, Cacadu District, Eastern Cape, South Africa.

The purpose of this report is to report on heritage–environmental compliance pertaining to the construction phase of the project to date.



Map 1: Layout of the Umoyilanga–Dassiesridge WEF



Map 2: Close-up of the wind turbine section of the Umoyilanga-Dassiesridge WEF

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#### 1 Environmental (and heritage) induction

On 28 September 2023, Indwe Environmental conducted environmental induction for the project team at the EDF Renewables offices, Waterfront Business Park, Humerail, Gqeberha/Port Elizabeth. Due to time constraints, it was decided to prioritise a site visit—planned heritage–environmental induction was not conducted and will be rescheduled.

A project heritage protocol for incidental finds/chance finds procedure has not yet been compiled/finalised and must be prioritised.

#### 2 Monitoring of vegetation clearing

At the time of the site visit the early works phase of the project had just started—limited vegetation clearing had been done, in a somewhat patch-patch manner, to facilitate early works implementation. One archaeological site was identified, namely Site DR-S8.

2.1 Site DR-S8 – Later Iron Age (LIA) – Workers' Cottage Remains and Graves – S33°34'39.3; E25°26'09.5"

Site DR-S8 is situated near the western access to the Umoyilanga–Dassiesridge WEF, along Road 5 to WTG-67. The site, exposed during vegetation clearing, comprises a rough 35x15m area. The remains of a square rough 4x4m stone built structure [DR-S8.1: S33°34′39.1″; E25°26′09.3] demarcates a likely former workers' cottage; the structure's square shape indicates an accultured site context, supporting a worker's cottage interpretation. Although the general region was occupied earlier on, many farms were registered from the mid-1800s onward, thus, signalling a mid to late Colonial Period date for the site. Two graves [DR-S8.2: S33°34′38.6″; E25°26′09.0″; DR-S8.2: S33°34′38.8″; E25°26′09.3″] are located nearby the cottage. Both graves are stone outlined and earth filled graves. Grave style indicates a Later Iron Age (LIA) cultural grave identity—although the possibility of them being Later Stone Age (LSA) graves cannot be excluded, albeit deemed unlikely. More graves may be present at the site, but time constraints did not allow a detailed site investigation during the site visit.

EDF Renewables and Power Construction team members reported that the site was fully overgrown with thicket prior to vegetation clearing, but it was uncertain when exactly the vegetation clearing took place. Moreover, no temporary conservation measures were in place—highlighting the importance of a heritage protocol for incidental finds/chance finds procedure to be finalised as soon as possible (ASAP) to stipulate temporary conservation and reporting strategies on uncovered heritage resources/sites to ensure responsible management thereof.

The on-site report that Site DR-S8 was fully overgrown signals fairly significant recent environmental change; the environment, at least in the greater site area, must have been more open at the time of the site's occupation, thus, within the approximate past 200 years.

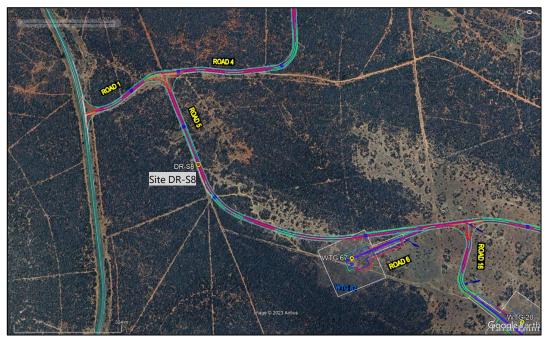
> Site significance rating and recommendations: Site DR-S8 is assigned a SAHRA High/Medium Significance and a Generally Protected IV-A field rating. Either site conservation, associated with realignment of Road 5 in the vicinity of the site, or Phase 2 mitigation must precede any further development impact in the area. Because

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of the process and time frames involved in the authorisation of a new road alignment, recommendations here focus on the Phase 2 mitigation process.

Phase 2 mitigation for the site would entail its detailed recording (site clearing and sketch plan), test pit excavations at the structure and the relocation of the two graves. Grave relocation is subject to a 60-day public notice and consultation process (local newspaper advertisements of the process needs to be placed ASAP to start the process). As a standard, grave relocation is based on the principle of reinternment at the nearest municipal cemetery. However, because of the archaeological context of the site—the graves' confirmed association with the structure remains and, thus, a *sense of place* of belonging on the farm—it is recommended that reinternment at a farm locality be prioritised (pending the results of the consultation process). The Site DR-S2 conservation area is proposed as a suitable place for reinternment, where a small area can be set aside to respectfully reintern the graves in a farm context and a small memorial can be built from the structure stones.

A temporary conservation fence must be erected around the site (~3–5m conservation buffer) to conserve the site as a single unit, and "No-go Area" signage must be attached thereto until the time that mitigation measures are set in place, be it road realignment and permanent conservation or Phase 2 mitigation. Phase 2 mitigation and grave relocation must be done under an ECPHRA permit.



Map 3: Location of Site DR-S8



Map 4: Site DR-S8 [yellow square: workers' cottage remains; yellow triangles: graves]



Plate 1: General view of Site DR-S8



Plate 2: Structure remains at Site DR-S8 [DR-S8.1]



Plate 3: One of the graves at Site DR-S8 [DR-S8.2]



Plate 4: The second grave at Site DR-S8 [DR-S8.3]

# 3 Upgrade of the "Service/Link Road" for use during the construction and operational phases of the project

The upgrade of the "Service/Link Road" comprises an approximate 6km road upgrade project, from a junction with Road 15, near WTG-64, in the west [S/LR-W: S33°3605.5"; E25°30′05.5"], to a junction with Road 9, near WTG-25, in the east [S/LR-E: S33°34′41.3"; E25° 27′46.3"]. The project essentially constitutes an in-situ road upgrade project: the existing farm access road, in places being a scraped and in others a two-track farm road will be broadened, levelled, compressed, and gravelled to furnish a 5–7m in width road to be used during the construction and operational phases of the project.

Low frequencies of lithic artefacts, mainly ascribable to the Middle Stone Age (MSA) but not excluding LSA samples occur in lens-like manner across sections of the road. However, even where artefacts are present, they occur in such low frequencies that neither an artefact ratio (artefact: m²) nor typological description is warranted.

The road upgrade project will traverse the 20m conservation buffer at the Colonial Period Site DR-S2 farmstead, where it is proposed to form part of an amendment conservation area [see 4.1 Site DR-S2].

The palaeontological sensitive Voorstehoek Formation lies west of the study site and will not be impacted by the road upgrade project [see 6 Paleontological matters].

Site significance rating and recommendations: MSA and LSA lithic artefacts occur in lens-like manner, but in such low frequencies across the extent of the road upgrade project study site, that their presence does not warrant a SAHRA site significance rating. It is recommended that the road upgrade project proceeds as planned without the developer having to comply with any archaeological mitigation requirements pertaining to infrequent lithic occurrences (lithic occurrences can be destroyed during the course of the road upgrade project, without the developer having to apply for an ECPHRA site destruction permit).



Map 5: The "Service/Link Road" (farm access road) study site



Plate 5: View of the "Service/Link Road" (farm access road) [1]



Plate 6: View of the "Service/Link Road" (farm access road) [2]



Plate 7: View of the "Service/Link Road" (farm access road) [3]



Plate 8: Lithic artefacts

#### 4 Previously identified and visited heritage resources/sites

#### 4.1 Site DR-S2 - Colonial Period - Farmstead - S33°35'37.7"; E25°29'45.6"

The Site DR-S2 Farm Gringley 188 vernacular farmstead—inferred to date to the mid-1800s—comprises the old farmhouse and an outbuilding. The Karoo style farmhouse is typified by its whitewashed walls, green corrugated iron roof, and columned roofed veranda or "open stoep"; the outbuilding, likewise, boasts whitewashed walls with a green corrugated iron roof. Period surface artefacts include rusted metal, earthenware, porcelain, and glass. More recent artefact admixture is evidenced by contemporary glass shards, rubber, and plastic. Both period and more recent artefacts are of a low to no significance—no collection or test pitting is required for retrieval, interpretation, or conservation purposes (van Ryneveld 2014).

The farmstead forms the central piece of the surrounding Colonial Period cultural landscape, typified by period farming infrastructure—a dam, water trough, etc. [DR-S2.1: S33°35′37.1″; E25°29′43.7″]—to its immediate west, farther north-westward square/rectangular shaped clusters of primarily aloe designate former wood/pole-fenced livestock enclosures [DR-S2.2: 33°35′33.0″; E25°29′38.2″; DR-S2.3: S33°35′31.0″; E25°29′37.6″; DR-S2.4: S33°35′28.7″; 25°29′35.3″], and with the vast remains (vegetation change) of more formerly wooden or pole-fenced livestock enclosures as well as old agricultural activity evident across the greater farmstead terrain.

Site DR-S2 was ascribed a SAHRA *Medium Significance* with a *Generally Protected IV-B* field rating, and recommendations for temporary/permanent conservation during the course of development, including permitted alteration to the site structures, if applicable, were made (van Ryneveld 2014).

EDF Renewables intends to permanently conserve the site during the early works phase of development, including the establishment of a permanent conservation fence, access gate, and permanent signage. A 20m conservation buffer around the site is, however, not possible. Proximity of the farm access road/"Service/Link Road" to the south of the site prohibits a 20m conservation buffer unless the road be realigned. However, the road forms part of the direct Site DR-S2 Colonial Period landscape: the road is proposed for upgrade—the "Service/Link Road" upgrade—within the development framework—the ambiance of the Colonial Period road will be lost, but its alignment and service purpose will be retained.

It is, therefore, requested that leave be granted for the conservation fence to follow the farm access road/"Service/Link Road" alignment to the south of the site; an approximate 3m distance between the conservation fence and the road will be maintained, and an approximate 2m distance, at its closest, between the conservation fence and the farmhouse. A 20m conservation buffer, from the farmhouse, will be maintained toward the northeast, north-west, and south-west to delineate the conservation area, providing for an approximate 0.2ha conservation area. The site will be fenced with a permanent pole and wire fence, with a vehicular access gate. A scraped farm road/track will connect the site with the access road. Two permanent "Heritage Site" signs will be affixed to the conservation fence, one being visible from the east and the other from the south-west.

The farmhouse and outbuilding will be conserved in situ. Continued (intermitted) occupation of the farmhouse is managed by the landowner.

An approximate 0.01ha conservation area for reburial of the Site DR-S8 graves, should this be approved—as well as graves encountered during the course of construction/in accordance with the protocol for incidental finds/chance finds procedure—is set aside in the northern part of the Site DR-S2 conservation area. This area will be temporarily fenced, and sign posted as a "No-go Area".

> Recommendations: It is requested that ECPHRA approves the proposed permanent conservation measures, with a focus on the amended conservation boundary fence for Site DR-S2.



Map 6: General locality of Site DR-S2



**Map 7:** Proposed conservation area at Site DR-S2 [yellow line: proposed conservation fence; thick yellow line: access gate; yellow triangles: heritage signage; yellow block: proposed Site DR-S8 conservation area]



Plate 9: The farmhouse of the Site DR-S2 farmstead



Plate 10: The farmhouse with the outbuilding toward the back



Plate 11: Sideview of the farmstead



Plate 12: The outbuilding



**Plate 13:** Colonial Period – contemporary farming infrastructure near Site DR-S2 [DR-S2.1]



**Plate 14:** Vegetation change indicating the presence of a former organic constructed livestock enclosure [1] [DR-S2.2]



**Plate 15:** Vegetation change indicating the presence of a former organic constructed livestock enclosure [2] [DR-S2.3]



Plate 16: Vegetation change indicating the presence of a former organic constructed livestock enclosure [3] [DR-S2.4]

#### 4.2 Site DR-F4 – Possible Human Burial Site – S33°35′51.7"; E25°30′35.2"

Site DR-F4 is situated approximately 60m east of the access road between WTG-01 and the junction of the WTG-60/WTG-61 road. The site is described as (CES 2021: 51, after Kruger 2021):

"F4: Possible Human Burial Site (\$33.59770° E25.50978°). This feature comprises an upright, flat monolith located east of the access road and cabling routes to WTG01.

Recommendations: The upright, flat monolith east of the access road and cabling routes to WTG01 might indicate a human burial site (where the feature might be a headstone) and it is primarily recommended that the site be left in situ and that a conservation buffer of at least 50m be observed around the feature, i.e. it would be advisable to redesign infrastructure components to avoid encroachment on the conservation buffer. Should impact on the site prove inevitable, the provenience of the feature should be tested by means of non-intrusive (Ground Penetrating Radar) or intrusive (archaeological excavations) methods. If the feature proves to be a human burial, full grave relocation procedures including social consultation should be effected."

The initial interpretation of Site DR-F4 is questioned. It is argued that the site is not a human burial site but a marker/beacon, with two proposed interpretations:

- a) Site DR-F4 is a trig beacon: should Site DR-04 be a trig beacon, then the absence of the metal cap and trig beacon number is questioned. However, these have been removed (site vandalism) from many old trig beacons; their absence at Site DR-F4, therefore, does not prove the site not to be a trig beacon. Then again, the site is situated on the lower slope of the rise. A trig beacon would be positioned higher up the slope—near the apex of the rise—for measuring purposes and, thus, raising the possibility of another marker/beacon purpose for the site.
- b) Site DR-F4 is a farm marker: situated near many a farm road junction with a fairly complex road network, it is asserted that the large, white-marked monolithic stone indicated direction to a farm locality, most likely for primary use by persons other than the farmer (or farm staff).

While many a culture group demarcated graves with monolithic stones, the monolith at DR-04 is notably large (~0.8m high) and, hence, distinctly non-typical of indigenous monolithic grave markers. If the site is a grave, then it is more likely that it would be a Colonial Period grave. The monolith is still fairly large for a Colonial Period (informal) grave marker, but it is rather the combination of its size, the absence of a grave inscription (absent from many old Colonial Period graves), the rough, albeit bold, but clearly with visibility as intent (many gravestones are whitewashed), and the isolated location of the feature that signals a farm marker identity for the site.

At the time of the site visit, a preliminary temporary conservation fence with an approximate 1.5–1.8m (1.5m in width and 1.8m in length) buffer around the site had been erected. Because of the different archaeological site interpretations, with direct impact on the site's significance rating, and associated mitigation/conservation recommendations—but here argued as unlikely to be a grave site—it is recommended that the preliminary

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temporary conservation fence be approved as suitable temporary conservation measure for Site DR-F4. Should this recommendation be approved, then "No-go Area" signage will be attached to the fence to finalise temporary site conservation measures for the site during the early works phase of development. Because infrastructure had been realigned to accommodate a 50m buffer around the site, site identification verification is not deemed crucial for project purposes, only clarification on temporary site conservation measures is, and with direct reference to the maintenance of the conservation fence for the tenure of construction.

A geotech test pit, labelled DR-F4.1 (S33°36′27.6″; E25°30′02.1″), situated approximately 1.5km from Site DR-F4, near WTG-21, may shed some light on aspects of the heritage characteristics of Site DR-F4. While the rich surface calcrete deposits typifying the study site has been widely reported on (Almond 2014; CES 2021, van Ryneveld 2014), the backfilled geotech pit provides some insight into the sub-surface calcrete characteristics of the direct development terrain. The churned backfilled material yielded clean calcrete chunks, implying a near exclusive calcrete sub-surface stratum, albeit for an unknown depth but with the geotech pit reasonably inferred to be some 0.5–1m in depth. Clean, quality, easily available calcrete is opined to signal local opportunistic past use thereof—it is inferred to have been used in the manufacture of *whitewash* (or white "paint") used at the Site DR-F4 monolith, and most likely also originally at Site DR-S2, with *whitewashed* (whitewash ranges in colour from white to soft pink and yellowish, depending on the raw material used) farmsteads being a signatory Karoo-style architectural feat; at Site DR-S2, the original *whitewash* had been replaced with white paint (maintenance and upkeep). If local calcrete was used to produce *whitewash*, then the Site DR-F4 monolith and the DR-F4.1 geotech pit form an interesting supplement to the mentioned Site DR-S2 Colonial Period cultural landscape, speaking of the past emphasis on low keyed locally sourced and widely used material to support a traditional Karoo farming lifestyle.

Site DR-F4 recommendations include testing—both Ground Penetrating Radar (GPR) and archaeological test excavations—to determine site identity (CES 2021, Kruger 2021). These methods are in principle acknowledged; however, it is recommended that GPR be combined with test excavations. Untested soil type may result in poor or no GPR visibility and indicated anomalies may not be readily identifiable without physical testing; it is, thus, recommended that site identity be best verified by a combination of GPR and archaeological test pits, or by archaeological test pits alone. While the use of GPR for human remains identification is recommended to be preapproved by ECPHRA, as a non-intrusive method, ECPHRA consent therefor is not compulsory. Phase 2 archaeological test pitting must be done under an ECPHRA permit.

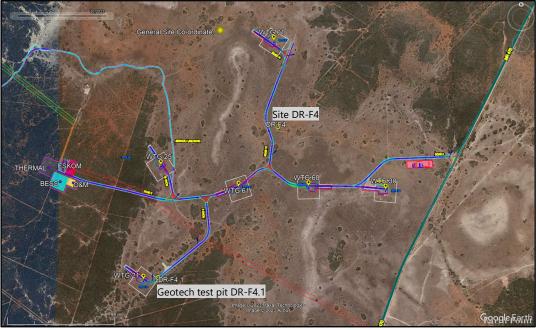
At Site DR-F4 verification of site identity is, however, of concern. If the site marks a grave, then the site is of high heritage significance. However, if the site is a farm marker, then the site is of cultural interest with reference to the cultural landscape, but of low to no cultural significance: farm markers are not readily NHRA 1999 protected heritage resources/sites.

Recommendations: It is requested that ECPHRA approves the preliminary temporary conservation fence, with its 1.5–1.8m conservation buffer around site DR-F4, as suitable temporary conservation measure for the project. Should this recommendation be approved, then "No-go Area" signage will be attached to the fence to finalise temporary site conservation measures for the site during the early works phase of development.

In addition, it is requested that ECPHRA confirms whether site identification testing would be required for Site DR-F4, and if so, to stipulate testing requirements for project purposes.



Map 8: Locality of Site DR-F4



Map 9: Localities of Site DR-F4 and geotech test pit DR-F4.1



Plate 17: Site DR-F4 from the nearby rise



Plate 18: Site DR-F4 with preliminary temporary conservation fencing in place [1]



Plate 19: Site DR-F4 with preliminary temporary conservation fencing in place [2]



Plate 20: The DR-F4.1 geotech test pit

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4.3 Site DR-F5 – Possible Human Burial Site – S33°36'36.3"; E25°29'47.3"

Site DR-F5 is described as (Kruger 2021: 43)

"F5: Possible Human Burial Site (S33.61009° E25.49648°). This feature comprises a number of circular and irregular stone cairns and stone heaps located at WTG21 and its access road and cabling routes. The cairns vary in size and they are irregularly situated in the landscape. The function and possible archaeological context of these cairns are not known but the possibility of the features indicating human graves should be considered. It is also possible that the features originated from agriculture activities where stones could have been cleared from adjacent fields for crop farming."

Site recommendations are listed as (Kruger 2021: 47–48):

"F5: The circular and irregular stone cairns and stone heaps located at WTG21 and its access road and cabling routes might indicate human graves but it is also possible that the features originated from agriculture activities where stones could have been cleared from adjacent fields for crop farming. Nonetheless, it is primarily recommended that the site be left in situ and that a conservation buffer of at least 50m be observed for the features, i.e. it would be advisable to redesign infrastructure components to avoid encroachment on the conservation buffer. Should impact on the site prove inevitable, the provenience of the site should be tested by means of non-intrusive (Ground Penetrating Radar) or intrusive (archaeological excavations) methods. If the features prove to be human burials, full grave relocation procedures including social consultation should be effected."

Site DR-F5 is situated about 250m south-east of WTG-21 (and the DR-S4.1 geotech test pit). The site was reported by EDF Renewables and Power Construction team members to comprise of some 30–40 cairn features. The cairns, situated routinely adjacent to the farm access road/track, with some being positioned slightly further away, however, are not graves. In size the cairns vary, measuring between ~2–4m in length, with some being near surface features, while others stand to approximately 1–1.5m in height. Indigenous graves, sometimes with extensive surface demarcations may well measure in the region of 2.5(+)m in size, but it is the characteristic absence of a patterned base-feature uniformity that manifests the cosmological life/death belief system, and that may result in more than one pattern at a site, as is often found at old cemetery sites, that signals a uniquely unlike grave identity for the features. While an argument can be made that many culture groups who once held onto a circular/oval cosmological life/death pattern adopted a rectangular pattern associated with the adoption of Christianity as religion, this is not inferred to explain the varying circular/oval vs rectangular base-patterns present at the site—even rectangular base-patterns are irregular without a Christian associated conformity/affinity.

The above, thus, raises the question of site identity other that the reported stone cairn–large grave site interpretation. The random stone cairns at the DR-F5 locality, situated routinely adjacent to the farm access road/track are interpreted merely as deposition cairns that resulted from the removal of surface stone to make the road/track; hence, their random base-feature nature without conformity to an underlying cosmological life/death belief pattern system.

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Surface stone thus collected seems to have served an additional past use function, aside from road clearance only, resulting in some cairns being near surface features, where cairn stones were again removed for use elsewhere, while other features still bear their original "cairn" deposition—or heap-like—quality. Stone may have been used "as is"—in its chunk or block-like forms—in the construction of farm structures; crushed and processed, it may have been used in the making of bricks, or perhaps more readily in the making of plaster/cement.

[The alternative interpretation by Kruger (2021), as cairns, or stone heaps, that resulted from field clearing for agricultural purposes would, thus, have resulted in a similar random base-feature cairn pattern, without conformity to a cosmological life/death belief pattern system, and such cairns are regularly found adjacent to old Colonial Period and Iron Age agricultural fields.]

The cairn site forms an interesting part of the Colonial Period cultural landscape and allows a brief local landscape interpretation: 'Follow the road until you see the DR-F4 whitewashed stone monolith on your lefthand side'—inferred to indicate direction to a farm locality, primarily for use by persons other that the farmer (or farm staff). 'About 200m from the monolith, at the T-junction, where the road swirls eastward toward the left, take a right turn. Carry on straight, for about 1.7km, that's where the site is.' The farmer, in this case, did not only use the stone for private use, but also dealt on local level therein.

Low keyed "industrial" use of resources, in this case, the stone collected (quarried) at the DR-F5 site, was widely practiced in the past, and the DR-F5 locality may not have been the only raw material resource site thus exploited and used in the region—many a current quarry/mining site in the region is reasonably inferred to have humble origins in the local use of raw material resources to support an earlier Karoo farming lifestyle.

To summarise, the reported stone cairn site at DR-F5 is an interesting Colonial Period cultural landscape feature/occurrence, reflective of landscape use to support a primarily self-sustainable, and low-keyed "industrial" and trade earlier Karoo farming lifestyle, but the site is of low to no cultural significance and does not necessarily constitute a NHRA 1999 protected resource/site. The site is not inferred to be a stone cairn—large grave site; should the site, in fact, be a grave site, then it would be a *Type Site*—the DR-F5 site would be the first of its kind identified as a burial site, because no such burial pattern has, as yet, been identified in South Africa.

Time constraints did not allow full site documentation at the time of the site visit. However, five cairns were plotted to briefly sketch geospatial distribution of the cairn features in relation to the farm access road/track.

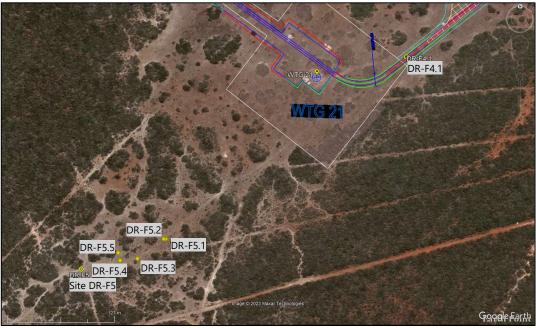
Recommendations: It is requested that ECPHRA:

Withdraws their issued compliance conservation requirements—including conservation fencing with a 50m conservation buffer around the cairn features and heritage signage—for Site DR-F5, based on this incident site assessment report, designating the locality as a Colonial Period cultural landscape feature/occurrence—no heritage site conservation measures are necessary at the locality, not during the construction or implementation phases of the project.

 Withdraws their development restriction beyond WTG21 for the Umoyilanga–Dassiesridge WEF based on classification of Site DR-F5 as a stone cairn–large grave site in favour of its designation as Colonial Period cultural landscape feature/occurrence. Should ECPHRA, based on difference of archaeological site interpretation, require verification of site identity to do so, then it is requested that ECPHRA stipulate the required testing methods. A cautionary note is, however, here raised with regard the use of GPR at stone cairn sites. GPR is a non-intrusive technology with many possibilities, but its use at a stone cairn site would require the scientific removal, for purposes of reconstruction, of all or sampled cairns on site. In addition, anomalies detected must still be physically tested. It is thus, practically, a high impact method with little definitive possibilities on its own and is best combined with Phase 2 archaeological test pits. In the case of a stone cairn site, Phase 2 archaeological test pitting alone often achieves the desired definitive results with equal (or less) impact on the site. Furthermore, because of the high unlikelihood of Site DR-F5 being a grave site, it is recommended that testing be done as archaeological testing, thus, under an archaeological permit, and not as grave verification, thus, without having to comply with the social consultation process related to grave sites.



Map 10: General locality of Site DR-F5



Map 11: Distribution of the sampled northern cairn features at Site DR-F5



Plate 21: Site DR-F5 cairn features situated along the farm access road/track



Plate 22: Cairn feature DR-F5.4



Plate 23: Cairn feature DR-F5.2



Plate 24: Cairn feature DR-F5.1

#### 5 Additional archaeological and cultural heritage matters

#### 5.1 Site DR-S1 – Colonial Period – Farmstead Remains – S33°36'09.1"; E25°26'38.0"

The Site DR-S1 Prentice Kraal 14/233 vernacular farmstead remains, inferred to date to the mid-1800s, comprise the rectangular pebble and cement remains of a 5(+) roomed structure. A low frequency of rusted metal artefacts was found on site. Approximately 150m from the farmstead remains a series of undulations and mound remains associated with alignments of garingboom (*Agave sisalana*) signalled the presence of period associated livestock enclosures originally constructed from organic material. The site was ascribed a SAHRA *Medium Significance* with a *Generally Protected IV-B* field rating (van Ryneveld 2014).

Site DR-S1 is situated more than 2km from the nearest development aspect. The property Prentice Kraal 233 seems to be wholly excluded from the project authorisation (CES 2021). The site will, by implication (proximity to the study site and project authorisation), not be impacted on and will also not be reported on in follow-up interim monitoring reports.

#### 5.2 Site DR-F1 – Possible Human Burial Site – S33°34′51.7″; E25°27′01.9″

Due to time constraints identified Site DR-F1, near WTG-52a, was not visited during the site visit. The site will be reported on in a follow-up interim monitoring report. The site is described as (Kruger 2021: 40):

"F1: Possible Human Burial Site (S33.58104° E25.45053°). This feature comprises a number of circular and irregular stone cairns located directly south of WTG52 and its access road and cabling routes. The cairns vary in size and they are irregularly placed on the landscape. The function and possible archaeological context of these cairns are not known but the possibility of the features indicating human graves should be considered. It is also possible that the features might indicate an initiation area due to the remoteness of the site and general absence of settlement remains."

## 5.3 Site DR-F2 – Possible Human Burial Site – S33°35′13.4″; E25°28′36.9″

Due to time constraints identified Site DR-F1 was not visited during the site visit. The site will be reported on in a follow-up interim monitoring report. The site is described as (Kruger 2021: 41):

"F2: Possible Human Burial Site (S33.58707° E25.47629°). This feature comprise a single circular stone cairn located along the proposed route for the OHL line. The cairn measures approximately  $1m \times 1m$  in size and no other man-made features were noted in its vicinity. The function and possible archaeological context of the cairn is not known but might represent a human grave."

#### 5.4 Site DR-F3 – Possible Human Burial Site – S33°35'31.0"; E25°28'50.9"

Due to time constraints identified Site DR-F3, near WTG-28, was not visited during the site visit. The site will be reported on in a follow-up interim monitoring report. The site is described as (Kruger 2021: 42):

"F3: Possible Human Burial Site (\$33.59197° E25.49748°). This feature comprise at least 3 elongated stone cairns located at WTG28 and its access road and cabling routes. The features, constructed out of quartzite stones, are relatively uniform in size. The exact function and possible archaeological context of these cairns are not known but according to indications the features are human burials."

#### 5.5 Site DR-F6 – Possible Historical Period Occupation Area – S33°34′28.7"; E25°28′21.5"

Due to time constraints identified Site DR-F6, near WTG-16, was not visited during the site visit. The site will be reported on in a follow-up interim monitoring report. The site is described as (Kruger 2021: 44):

"F6: Possible Historical Period Occupation Area (\$33.57464° E25.47265°). This feature comprises a possible Historical Period settlement area at WTG16. Here, an ash and cattle dung deposit as well as stonewall foundation structures were noted in dense Prickly Pear stands. Material culture such as metal and glass were noted and the site likely dates to the late Historical Period."

#### 5.6 Site DR-F7 – Possible Human Burial Site – S33°33′56.8″; E25°28′46.3″

Due to time constraints identified Site DR-F7, near WTG-54[?], was not visited during the site visit. The site will be reported on in a follow-up interim monitoring report. The site is described as (CES 2021: 52):

"F7: Possible Human Burial Site (S33.56580° E25.47954°). This feature comprises a single circular stone cairn located directly north of WTG16 [WTG-54?]. The cairn measures approximately 1m x 1m in size and no other man-made features were noted in this vicinity. The function and possible archaeological context of the cairn is not known but it might represent a human grave."

#### 5.7 Monitoring of vegetation clearing with a specific focus on Stone Age resources/sites

Notable changes from the initially proposed Dassiesridge to the authorised Umoyilanga–Dassiesridge WEF resulted in associated amended requirements for archaeological monitoring of vegetation clearing with a specific focus on, albeit not limited to, Stone Age resources/sites, briefly summarised as:

ARCHAEOLOGICAL MONITORING OF VEGETATION CLEARING WITH A FOCUS ON STONE AGE RESOURCES/SITES					
DASSIESRIDGE WEF	UMOYILANGA-DASSIESRIDGE WEF				
Turbine line WTG-01-TWG-02-WTG-03-WTG-05	Turbine WTG-01				
Turbine line WTG-08-WTG-06-WTG-07-(WTG-40)-WTG-05	Turbine WTG-08				
Turbine line WTG-03/04-WTG-07/39	N/A				
Turbine line WTG-16-WTG-17	Turbine WTG-16				
Turbine line WTG-20-WTG-21	Turbine line WTG-20-WTG-21				
Turbine WTG-44	N/A				
Turbine <del>WTG-46</del>	N/A				
Turbine WTG-51	N/A				
Turbine <del>WTG-50</del>	N/A				
Turbine WTG-63	Turbine WTG-63				
Turbine line WTG-15-WTG-19-WTG-23	N/A				

**Table 2:** Summary of monitoring of vegetation clearing with a specific focus on Stone Age resources/sites applicable to the Umoyilanga–Dassiesridge WEF

In summary, vegetation clearing in the vicinities of turbines WTG-01, WTG-08, WTG-16, WTG-63, and turbine line WTG-20–WTG-21 will be monitored with a specific focus on Stone Age resources/sites (CES 2021).

# 5.8 The Colonial Period–contemporary infrastructure destruction list/register

Farming infrastructure—ranging from reservoirs to large brick and cement/corrugated iron cladded dams, to smaller brick and cement dams, to water troughs, and feed lots—some derelict and others still in use, abounds at the site. Continuous use of these resources/sites over time resulted in continuing reparations and alterations for purposes of upkeep that makes it near impossible to determine which infrastructural resources are older, and which younger than 60 years of age, directly affecting their heritage status quos, site significance ratings, and related recommendations; however, the majority infrastructure are of a low to no heritage significance. It was, therefore, recommended that a basic infrastructure destruction list/register be kept (van Ryneveld 2014).

The destruction of all infrastructure still in use must be authorised by the landowner prior to destruction, unless suitable arrangements for destruction have been agreed upon in the applicable lease agreement.

#### 6 Paleontological matters

Almond (2014: 1) identified two potentially highly sensitive palaeontological areas:

"Significant impacts on fossil heritage for this project are only anticipated in two small portions of the Dassiesridge WEF study area (marked in green on Fig. 62 herein):

- A sector of the access road from the R75 that runs in a low-lying area underlain by the Voorstehoek
   Formation (Grassridge 187);
- Wind turbine positions and associated access roads in the eastern portion of Farm 3/190 that may
  impact fossil oyster beds in the basal Alexandria Formation, as well as fossil wood and marine shell
  in the Kirkwood and Sundays River Formations respectively."

Only one of the sensitive palaeontological areas described, namely the Voorstehoek Formation area, located in the WTG-08–WTG-63–WTG-67–WTG-20–WTG-52a region applies to the authorised development layout; the paleontologically sensitive basal Alexandria, Kirkwood, and Sundays Formations lie to the east thereof. Almond (2014: 2), moreover, recommended that, "[d]uring the construction phase all deeper (>1m) bedrock excavations should be monitored for fossil remains by the responsible Environmental Control Officer (ECO)." At the time of the site visit the early works phase had just started, with impact mainly confined to limited vegetation clearing—no palaeontological finds were reported on, not by the project team or the ECO.



Map 12: Paleontological sensitivity

SUNDAYS RIVER VALLEY LOCAL MUNICIPALITY, NELSON MANDELA BAY METROPOLITAN MUNICIPALITY, EASTERN CAPE

- 1. ECPHRA is the heritage consenting authority for development projects in the Eastern Cape.
- 2. SAHRA does not have a mandate to comment on heritage for developments in the Eastern Cape, except where the development impacts, directly or indirectly (in close proximity), on a NHS or a WHS.
- 3. Heritage management across South Africa, whether managed by SAHRA or a PHRA—being the ECPHRA in the Eastern Cape—follows the same basic procedure as described in the:
  - o National Heritage Resources Act, Act No. 25 of 1999 (NHRA 1999).
  - o NHRA 1999 Regulations 2000 No. 21239 (permitting process).
  - SAHRA. 2007. Minimum standards: archaeological and palaeontological components of impact assessment reports.
- 4. Across South Africa heritage is managed via the online SAHRIS system.

# Landowner interpretation/comments on Site DR-S8

The landowner requested Jeremy Peyroutet, EDF Renewables, to communicate his interpretation/comments on Site DR-S8 to ECPHRA. (See email communication by Peyroutet).



# **DWP site visit || Heritage**

Jeremy Peyroutet < Jeremy.Peyroutet@edf-re.co.za>

11 October 2023 at 23:23

To: Karen Low <Karen.Low@edf-re.co.za>, ArchaeoMaps <k.archaeomaps@gmail.com>

Cc: Andries Junior Bierbaum < Andries Bierbaum@edf-re.co.za>

Hi Karen and Karen.

The landowner confirmed that "those stones are not from a grave or any sorts but stones that were used along a fence line to anchor the netting, there used to be a fence line there and when [they] broke the fence down a few years ago [they] stacked the stones like that as they were lying in the road and [they] removed them from the road."

When we compare recent google images from 2019 and 2023, we can easily that these potential heritage findings (if any) were not covered by vegetation, but indeed already in an open area when works started:

2019 (before vegetation clearing):



2023 (after vegetation clearing)



That being said, there is a possibility that these findings are not graves and I would appreciate if the report could identify them as "potential graves", including the feedback from the farmer.

Nothing was identified the heritage impact assessment from 2014 neither. In this screenshot from august 2014, we can see that there is actually less vegetation that we have to date. I am very surprised that these findings were not identified back in time if they were present at this time.



In conclusion, my suggestion would be:

- to reschedule a site visit to double check, ideally with a scanner or another method that could help us to confirm the presence of graves or not; and
- to approach the authorities with an updated report anyway in order not to lose time in a situation were the cottage/graves are confirmed.

BR,

Jeremy

From: Karen Low <Karen.Low@edf-re.co.za> Sent: Wednesday, October 11, 2023 4:17 PM To: ArchaeoMaps <k.archaeomaps@gmail.com>

Cc: Jeremy Peyroutet < Jeremy.Peyroutet@edf-re.co.za>; Andries Junior Bierbaum < Andries.Bierbaum@edf-re.co.za>

Subject: RE: DWP site visit || Heritage



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