OSLAAGTE SOLAR 2 (PTY) LTD

PROPOSED 460MW OSLAAGTE SOLAR 2 PHOTOVOLTAIC PROJECT, SOUTHEAST OF KROONSTAD, FREE STATE PROVINCE

HERITAGE IMPACT ASSESMENT 26 MAY 2023

Submitted to: Nemai Consulting

Prepared by:

Jennifer Kitto

Nitai Consulting (PTY) Ltd

147 Bram Fischer Drive

Ferndale

2194



The heritage impact assessment report has been compiled considering the NEMA Appendix 6 requirements for specialist reports as indicated in the table below.

Requirements of Appendix 6 – GN R326 EIAs Regulations (2014, amended 2017)	Relevant section in report	
	Section 1.1.3 of	
1.(1) (a) (i) Details of the specialist who prepared the report	Report	
(ii) The expertise of that person to compile a specialist report including a curriculum vita	Section 1.1.3 and of Report and Appendix 2	
(b) A declaration that the person is independent in a form as may be specified by the competent authority	Page iii of the report	
(c) An indication of the scope of, and the purpose for which, the report was prepared	Section 1.1	
(cA) An indication of the quality and age of base data used for the specialist report	N/A	
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 5	
(d) The duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 6	
(e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 7	
(f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;	Section 5.2 and 5.4, Section 6	
(g) An identification of any areas to be avoided, including buffers	Section 6, Section 12	
(h) A map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Appendix 1	
(i) A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 3	
(j) A description of the findings and potential implications of such findings on the impact of the proposed activity, including identified alternatives, on the environment	Sections 6, 8	
(k) Any mitigation measures for inclusion in the EMPr	Sections 11, 12	
(I) Any conditions for inclusion in the environmental authorisation	N/A	
(m) Any monitoring requirements for inclusion in the EMPr or environmental authorisation	N/A	
(n)(i) A reasoned opinion as to whether the proposed activity, activities or portions thereof should be authorised and	Section 12	
(n)(iA) A reasoned opinion regarding the acceptability of the proposed activity or activities; and		
(n)(ii) If the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	Section 11, 12	
(o) A description of any consultation process that was undertaken during the course of carrying out the study	Not applicable. A public consultation process will be handled as part of the EIAs and EMPr process.	

Requirements of Appendix 6 – GN R326 EIAs Regulations (2014, amended 2017)	Relevant section in report
	Not applicable. To date no comments have been raised regarding heritage
(p) A summary and copies if any comments that were received during any consultation process	resources that require input from a specialist.
(q) Any other information requested by the competent authority.	Not applicable.
(2) Where a government notice by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	Section 38(3) of the NHRA

Declaration of Independence

The report has been compiled by Nitai Consulting (Pty) Ltd, an appointed Heritage Specialist for Nemai Consulting for the Proposed 460MW Oslaagte Solar 2 Photovoltaic Project Southeast of Kroonstad, Free State Province. The views contained in this report are purely objective and no other interests are displayed during the Heritage Impact Assessment Process.

I, Jennifer Kitto, declare that -

General declaration:

- I act as the independent heritage specialist for this project
- I will perform the work relating to the project in an objective manner, even if this results in views and findings that are not favourable to the applicant
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting heritage impact assessments, including knowledge of the National Heritage Resources Act, No 25 of 1999 (NHRA), associated Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the NHRA, Regulations and all other applicable legislation, including National Environmental Management Act, No 107 of 1998 (NEMA);
- I will take into account, to the extent possible, the matters listed in section 38 of the NHRA when preparing the application and any report relating to the application;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the project by the competent authority; and the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;
- I will provide the competent authority with access to all information at my disposal regarding the project, whether such information is favourable to the applicant or not
- All the particulars furnished by me in this form are true and correct;
- I will perform all other obligations as expected of a heritage specialist in terms of the NHRA and the NEMA and the constitutions of my affiliated professional bodies; and
- I realise that a false declaration is an offence in terms of regulation 71 of the NEMA Regulations and is punishable in terms of section 24F of the NEMA.

Disclosure of Vested Interest

I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Regulations;

<u>HERITAGE CONSULTANT -</u> Nitai Consulting (Pty) Ltd

PRINCIPAL HERITAGE PRACTITIONER Jennifer Kitto

<u>CONTACT PERSON -</u> Jennifer Kitto

Tel - +27 (0) 633316606

Email – jenniferK@nitaiconsulting.co.za

SIGNATURE -

ACKNOWLEDGEMENT OF RECEIPT

CLIENT - Nemai Consulting

CONTACT PERSON - Donavan Henning

Tel - +27 (0) 11 781 1730

Fax - +27 (0) 11 781 1731

Email - donavanH@nemai.co.za

SIGNATURE -

Executive Summary

The applicant, Oslaagte Solar 2 (Pty) Ltd, proposes the development of a 460MW solar photovoltaic (PV) facility, as well as associated infrastructure, on a site located near the town of Kroonstad in the Free State Province. The solar PV facility will be known as Oslaagte Solar 2 PV.

The Oslaagte Solar 2 (up to 460MW) Solar PV Project will be located approximately 17,5 km to the southeast of Kroonstad's central business district (CBD) and falls within Ward 1 of the Moqhaka Local Municipality (MLM). The electricity generated by the Project will be transmitted through a 132kV power line between facility substation and the Eskom Collector Switching Station/Main Transmission Substation (MTS). At this stage it is envisaged for the project to be bid into the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP).

Methodology/ Significance Assessment

The Site Survey fieldwork provided confirmation of the existence of heritage resources occurring within and close to the solar PV project area footprint. The inspection identified a total of four heritage resources situated within the project area footprint. Two of these sites are recent/modern structures (Os2-01 and Os2-03), one is a graveyard depicted on the 1960 topographic map (Os2-04) and one comprises several clusters of rocks likely to be the remains of an African homestead (Os2-02).

Identification of Activities, Aspect, and Impacts

The project area that will be impacted by the proposed Oslaagte Solar 2 PV project contains some areas that are currently disturbed by grazing activities and other animal activity (e.g., burrows and termite mounds). The impact significance of the project on graves and cemeteries is high before mitigation as the graveyard site (Os2-04) and site with potential infant burials (Os2-02) are both located inside the proposed PV array area of the project footprint. Site Os2-04 is protected by section 36 of the NHRA and must be avoided in the design planning (as a "no go" area). There is also a possibility that potential infant burials could be located at Site Os2-02. However, implementation of the mitigation measures required will reduce the impact to low.

The impact significance of the proposed project on protected historical structures is low as only one potential historical structure site was identified (Os2-02) which contained the collapsed remains of several structures of a homestead.

Alternatives

The project applicant adopted a comprehensive iterative design process to inform the Oslaagte Solar 2 PV layout/design. By integrating the screening and assessment of environmental (including heritage) and social constraints alongside the technical components of the project, allowed for the reduction in risks to the project.

All the identified heritage resources have been avoided by the Alternative 2 layout, however there may be some indirect impacts associated with the construction related activities such as site clearance, etc. Therefore, the mitigation measures set out below remain applicable.

Mitigation Measures

The proposed Oslaagte Solar 2 PV project (Alternative 1 and Alternative 2) could impact on heritage resources identified within and adjacent to the project footprint. Heritage resources that were verified by the field survey to occur within the project footprint include a total of four heritage resources situated within the project area footprint and one situated just north of the north-eastern boundary (within the Oslaagte Solar 1 PV footprint). Two of these sites are recent/modern structures (Os2-01 and Os2-03), one is the graveyard depicted on the 1960 topographic map (Os2-04) and one comprises several clusters of rocks likely to be the remains of an African homestead (Os2-02).

In terms of the impact on the identified heritage resources, the Alternative 2 layout which has been revised to exclude certain environmentally and heritage sensitive areas is the preferred alternative. However, the graveyard site (Os2-04) and homestead site with potential infant graves (Os2-02) could still be subject to indirect impact, specifically during site clearance or construction activities. Consequently, the mitigation measures set out above and below will still apply.

The recommendations below are provided to mitigate the potential impact of the grid connection on the identified heritage resources:

- The heritage sites Os2-02 and Os2-04 must be protected with at least a 30m buffer;
- The formal graves at Site Os2-04 are protected by section 36 of the NHRA and must be demarcated and avoided as a "no go" area. There is also a possibility that potential infant burials could be located at Site Os2-02. This site should also be demarcated and avoided as a "no go" area.;
- The remains of Historical structures at Os2-02 are protected by section 34 of the NHRA and should be fenced and avoided as "no go" areas to prevent any indirect impact;
- A separate desktop palaeontological assessment is being undertaken by a palaeontologist as
 the project area falls into an area of Very High fossil sensitivity. The desktop assessment will
 indicate if significant/sensitive fossils will be impacted by the proposed project and provide
 mitigation measures and the way forward in this regard.

No fatal flaws were identified during this study, therefore, it is the considered opinion of the heritage specialist that the construction of the proposed Oslaagte Solar 2 PV project within the footprint can proceed. There are no objections from a heritage perspective provided the recommendations and

mitigation measures contained in this report and in the palaeontological assessment are implemented before any site clearance or construction activities commences. In terms of the impact on the identified heritage resources, Alternative 2 is preferred as the layout has been revised to avoid the two sites containing historical graves and structure remains (Os2-04 and Os2-02).

Table of Contents

INTRODUCTION	1	
Scope & Terms of Reference for the HIA report	1	
Summary of Key Issues & Triggers Identified During Scoping		
Approach	1	
Nominated Specialist Details	1	
Project Description	2	
LEGISLATION	2	
National Heritage Resources Act, No 25 of 1999 (NHRA)	2	
National Environmental Management Act, Act 107 of 1998 (NEMA)	3	
The National Health Act, No. 61 of 2003 (NHA), Regulations 2013	3	
ASSUMPTIONS AND CONSTRAINTS	3	
PROJECT DESCRIPTION	4	
Location	4	
Project Technical Details	6	
Solar Technology	6	
PV Technology Overview	6	
Overview of Technical Details: Oslaagte 2 Solar PV project	7	
Project Layout	7	
Components of the Proposed Solar PV Plant	8	
STATUS QUO ANALYSIS	9	
General Existing Condition of Receiving Environment	9	
Cultural-Heritage Receiving Environment	12	
DFFE Environmental Screening Tool	12	
Historical Background of Surrounding Region (archaeological and historical literature survey)	13	
Cartographic findings	18	
Previous HIA reports in the area	21	
Desktop Palaeontological sensitivity		
Findings of the Historical Desktop Study	23	
SITE SURVEY/FIELDWORK RESULTS	23	
	Scope & Terms of Reference for the HIA report Summary of Key Issues & Triggers Identified During Scoping Approach Nominated Specialist Details Project Description LEGISLATION National Heritage Resources Act, No 25 of 1999 (NHRA) National Environmental Management Act, Act 107 of 1998 (NEMA) The National Health Act, No. 61 of 2003 (NHA), Regulations 2013 ASSUMPTIONS AND CONSTRAINTS PROJECT DESCRIPTION Location Project Technical Details Solar Technology PV Technology Overview Overview of Technical Details: Oslaagte 2 Solar PV project Project Layout Components of the Proposed Solar PV Plant STATUS QUO ANALYSIS General Existing Condition of Receiving Environment Cultural-Heritage Receiving Environment DFFE Environmental Screening Tool Historical Background of Surrounding Region (archaeological and historical literature survey) Cartographic findings Previous HIA reports in the area Desktop Palaeontological sensitivity Findings of the Historical Desktop Study	

7	7 SIGNIFICANCE ASSESSMENT	
7.1 Methodology for Assessing Heritage Site Significance		35
8	IDENTIFICATION OF IMPACTS	39
8.1	Impacts and Mitigation Framework	39
8.2	Identification of Activities and Aspects	41
8.3	Impact and Mitigation Assessment	42
8.4	Impacts During the Planning, Construction and Operation Pha	ase 42
8.5	Cumulative impacts	44
9	ANALYSIS OF ALTERNATIVES	45
9.1	Introduction	45
9.2	Site Alternatives	45
9.3	Layout / Design Alternatives	45
9.4	Technology Alternatives Er	ror! Bookmark not defined.
9.4.1	PV TechnologyEr	ror! Bookmark not defined.
9.4.2	BESS TechnologyEr	ror! Bookmark not defined.
9.5	No-Go Option	45
10	STATEMENT OF IMPACT SIGNIFICANCE	46
11	HERITAGE MANAGEMENT GUIDELINES	46
11.1	General Management Guidelines	46
12	RECOMMENDATIONS AND CONCLUSION	47
13	REFERENCES	48
Арре	NDIX 1: HERITAGE SENSITIVITY MAP/S	50
Арре	NDIX 2: CURRICULUM VITAE OF HERITAGE SPECIALIS	т54
	f Tables	_
	I: Technical details of the proposed PV PlantI: SAHRIS Fossil Map Palaeontological Sensitivity Ratings and Rec	7 22 quired Actions
	3: Literature sources accessed	quired Actions 22
	I: Rating system for archaeological resources	36
Table 5	s: Rating system for built environment resources	37
Table 6	5: Site significance classification standards as prescribed by SAHF	RA. 39

Table 7: Impact and Mitigation Quantification Framework	40
Table 8: Impact Methodology Table	41
Table 9: Activity, Aspects and Impacts of the Project	41
Table 10: Heritage Resources – Historical Graves Mitigation Table	42
Table 11: Heritage Resources – Historical Structures Mitigation Table	43
List of Figures	
Figure 1: Oslaagte Solar 2 Project Locality south of Kroonstad (Nemai 2023)	
Figure 2: Oslaagte Solar 2 PV Project - Layout Alternative 1	
Figure 3: Oslaagte Solar 2 PV Project - Layout Alternative 2	
Figure 4: Overview of Solar PV Power Plant (International Finance Corporation, 201 Solar Photovoltaic Power Plan.)	•
Figure 5: View of the vegetation and terrain in the north-central section of the project	•
Figure 6: General view of the grassland and shrubs, with a termite mound in the lower le	
Figure 7: View of the long dense grass vegetation on the south-central section of the pro-	•
Figure 8: View showing the mixed grassland and acacia vegetation over large portions footprint	of the project
Figure 9: View of existing powerline and grassland vegetation in the south-eastern project footprint	
Figure 10: Archaeological Cultural Sensitivity map indicating that the project footprint is	
a region of low archaeological and cultural heritage sensitivity (DFFE Screening To	
Figure 11: Palaeontological Sensitivity map indicating that the project footprint is lo region with Very High palaeontological sensitivity (DFFE Screening Tool)	
Figure 12: Enlarged view of topographic map 2727CD Ed 1 1960, depicting two heritage	features within
the Oslaagte Solar 2 PV footprint – Alternative 1. One feature is a graveyard, and	one feature is
a group of homesteads. There are also four structures marked in the area adjacent	t to the railway
line, immediately outside the north-west corner of the footprint. Two homestead	ds are depicted
at the south end of the powerline. All features are marked by orange polygons	19
Figure 13: Enlarged view of topographic map 2727CD Ed 1 1960, depicting one herit	tage feature (a
cemetery) within the Oslaagte Solar 2 PV footprint – Alternative 2. Two features ar	e depicted just
outside or on the boundary of the footprint: one is a group of homesteads, the o	ther is a group
of four structures located adjacent to the railway line, immediately outside the no	rth-east corner
of the footprint. The powerline is not included in this view. All features are mar	ked by orange
polygons	20

Figure 14: SAHRIS Palaeo-sensitivity map overlain on the Oslaagte Solar 2 PV project footprint (purple
polygon). The underlying geology is shown as having Very High fossil sensitivity (red)22
Figure 15: View of support structure for water tank (Site Os2-01)24
Figure 16: View of Os2-02, looking north
Figure 17: Another view of the rock clusters, looking south
Figure 18: View of western elevation of the substation building, Os2-0328
Figure 19: View of northern end of the substation building, showing swallow/ swift colony nests28
Figure 20: View of the Botha family graveyard, showing the fence and dense vegetation30
Figure 21: View of the Botha family graves, from inside the fenced area30
Figure 22: View of the oldest Botha grave in the graveyard (date of death 1925)31
Figure 23: View of the second oldest grave, (date of death 1930)31
Figure 24: View of the most recent grave in the graveyard (date of death 1983)31
Figure 25: Heritage resources identified during the site survey and overlain on the project layout –
Alternative 1 (blue icon = Structure or Homestead, red icon = grave)32
Figure 26: Heritage resources identified during the site survey and overlain on the project layout –
Alternative 2 (blue icon =heritage resource)
Figure 27: Site Survey Tracklog (orange lines) overlain on the general project footprint area (purple
polygon)34
Figure 28: Side view of proposed tracker mounting structure Error! Bookmark not defined.
Figure 29: example of Monofacial solar panels (https://www.bluestemenergysolutions.com/bifacial-
versus-monofacial-solar-panels-an-analysis/ Error! Bookmark not defined.
Figure 30: Example of bifacial solar panels (https://www.bluestemenergysolutions.com/bifacial-
versus-monofacial-solar-panels-an-analysis/) Error! Bookmark not defined.
Figure 31: Heritage Sensitivity for Oslaagte Solar 2 PV – Layout Alternative 152
Figure 32: Heritage Sensitivity for Oslaagte Solar 2 PV – Layout Alternative 253

List of Abbreviations

APHP Association of Professional Heritage Practitioners

ASAPA Association of Southern African Professional Archaeologists

BESS Battery Energy Storage System
CRM Cultural Resources Management

DALRRD Department of Agriculture, Land Reform & Rural Development

DFFE Department of Environment, Fisheries and Forestry

EA Environmental Authorisation

EIA Environmental Impact Assessment

EAP Environmental Assessment Practitioner

EIA Early Iron Age

EMPr Environmental Management Programme

ESA Early Stone Age

GIS Geographic Information System

ha Hectare

HIA Heritage Impact Assessment
IAP Interested and Affected Party

IAIAsa International Association for Impact Assessment South Africa

km Kilometre (1 000m)

LIA Late Iron Age

kV Kilo Volt

LSA Later Stone Age
MSA Middle Stone Age

MTS Main Transmission Station

NEMA National Environmental Management Act (No. 107 of 1998)

NHA National Health Act, (No. 61 of 2003)

NHRA National Heritage Resources Act (No 25 of 1999)

NHS National Heritage Site

PHRA Provincial Heritage Resources Authority

PV Photo Voltaic

FSHRA Free State Heritage Resources Authority

REIPPPP Renewable Energy Independent Power Producer Procurement Programme

SAHRA South African Heritage Resources Agency

1 Introduction

The Applicant, Oslaagte Solar 2 (Pty) Ltd, proposes the development of a 460MW solar photovoltaic (PV) facility, as well as associated infrastructure, to be located approximately 17,5 km southeast of Kroonstad. The Oslaagte Solar 2 (up to 460MW) Solar PV Project will be located on the Farm Oslaagte 2564, within Ward 1 of the Moqhaka Local Municipality (MLM). The project will cover up to approximately 600 ha and is intended to generate up to 460MW. The electricity generated by the Project will be transmitted through a 132kV power line between facility substation and the Eskom Collector Switching Station/Main Transmission Substation (MTS). At this stage it is envisaged for the project to be bid into the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP).

1.1 Scope & Terms of Reference for the HIA report

1.1.1 Summary of Key Issues & Triggers Identified During Scoping

In terms of the NHRA, the following proposed activities trigger the need for a Heritage Impact Assessment (HIA):

- Potential occurrence of heritage resources, graves and structures older than 60 years within the Project's footprint.
- Proposed development that is more than 5000m²
- Proposed linear development that is longer than 300m
- Proposed development where an impact assessment is triggered in terms of NEMA.

1.1.2 Approach

- Undertake a Heritage Impact Assessment in accordance with the NHRA.
- Identify and map all heritage resources in the area affected, as defined in Section 2 of the NHRA, including archaeological sites on or near (within 100m of) the proposed developments.
- Assess the significance of such resources in terms of the heritage assessment criteria as set out in the regulations.
- Assess the impacts of the Project on such heritage resources.
- Prepare a heritage sensitivity map (GIS-based), based on the findings of the study.
- Identify heritage resources to be monitored.
- Comply with specific requirements and guidelines of FSHRA and SAHRA.

1.1.3 Nominated Specialist Details

Organisation:	Nitai Consulting
Name:	Jennifer Kitto

Qualifications:	BA Archaeology and Social Anthropology; BA (Hons) Social Anthropology		
No. of years' experience:	24		
Affiliation (if applicable):	Association of Southern African Professional Archaeologists (ASAPA) - Technical member No.444 International Association for Impact Assessment (IAIAsa) –		
	Member No. 7151		

1.2 **Project Description**

The Oslaagte Solar 2 120MW Solar Photo Voltaic (PV) Project will be located on the Farm Oslaagte 2564, within Ward 1 of the Moqhaka Local Municipality (MLM). The project will cover up to approximately 480 ha and is intended to generate up to 240MW. The electricity generated by the Project will be transmitted through a 132kV power line from the new facility substation to a new 400/132 kV Main Transmission Substation (MTS). The 132kV powerline is approximately3.45 kilometres (km) long, with a 100 meter (m) wide assessment corridor.

2 LEGISLATION

The identification, evaluation and assessment of any cultural heritage site, artefact or find in the South African context is required and governed by various pieces of legislation, including the National Heritage Resources Act, 25 of 1999 (NHRA) and associated Regulations, National Environmental Management Act, Act 107 of 1998 (NEMA) and associated Regulations and, as well as the National Health Act, Act No. 61 of 2003 (NHA), specific Regulations governing human remains.

2.1 National Heritage Resources Act, No 25 of 1999 (NHRA)

The NHRA is the defines cultural heritage resources (section 3), provides protection to specific types of heritage resources (sections 34, 35, 36) and requires an impact assessment of such resources for specific development activities (section 38(1)). Section 38(8) further allows for cooperation and integration of the management of such impact assessment between the national or provincial heritage authority (SAHRA or a PHRA) and the national environmental authority (DFFE).

In terms of section 38(1)(a) of the NHRA, the specific types of development activity that may require a Heritage Impact Assessment (HIA) include: the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length. As the proposed Solar PV project is larger than 5000m², this study falls under s38(8) and requires comment from the relevant heritage

resources authority. (South African Heritage Resources Authority-SAHRA and/or the Free State Provincial Heritage Authority).

Sections 34-36 of the NHRA further stipulate the protections afforded to specific types of heritage resources, i.e., structures older than 60 years (s34); archaeological, palaeontological, meteorites (s35); graves and burial grounds (s36), as well as the mitigation process to be followed if these resources need to be disturbed. The construction of the solar PV project and associated powerline may result in impacts to any of these types of heritage resources.

2.2 National Environmental Management Act, Act 107 of 1998 (NEMA)

NEMA states that an integrated Environment Management Plan (EMP) should, (23 -2 (b)) "...identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage". In addition, the NEMA and associated Regulations GNR 982 (Government Gazette 38282, 14 December 2014, amended 2017) state that, "the objective of an environmental impact assessment process is to, ... identify the location of the development footprint within the preferred site ... focussing on the geographical, physical, biological, social, economic, *cultural and heritage aspects* of the environment" (GNR 982, Appendix 3(2)(c), emphasis added).

The EIA Regulations, 2014 (as amended, 2017), published in GNR 982 of 2014 (Government Gazette 38282) promulgated under the (NEMA) contain specific requirements to be addressed in the different types or impact assessment repots (Regulations 19, 21 and 23) as well as requirements for Specialist Reports (Appendix 6).

2.3 The National Health Act, No. 61 of 2003 (NHA), Regulations 2013

In the case of graves and/or burial grounds that could be impacted by a proposed development, and which are identified through an impact assessment, specific Regulations relating to the Management of Human Remains (GNR 363 of 2013 in Government Gazette 36473) address the exhumation and reburial of human remains: Regulations 26, 27 and 28.

3 ASSUMPTIONS AND CONSTRAINTS

This assessment assumes that all the information provided by the Applicant and the Environmental Assessment Practitioner (EAP) regarding the project footprint (Including the powerline) is correct and current.

The project area traverses various properties separated by fences, and access was often restricted by localised flooding due to the rainy (summer) season and extremely dense vegetation (grass and acacia

thicket), as well as the occurrence of animal burrows and large termite mounds in some areas. In addition, some gates to fields were locked and therefore not all areas were accessible.

The large area of the project footprint meant that it was not feasible to undertake a pedestrian survey of the whole area and the fieldwork, therefore, comprised a combination of vehicle and pedestrian investigation. The extremely dense and long vegetation in several areas meant that archaeological and heritage visibility was low in those areas. Therefore, there is a possibility that some heritage resources were not identified, specifically, graves or burial sites.

4 PROJECT DESCRIPTION

4.1 Location

The Oslaagte Solar 2 project is located on the Farm Oslaagte 2564, and will cover up to approximately 600haa. The solar PV facility has a contracted capacity of up to 460 MW. The 132kV power line will exit the new facility substation, which is located near the south eastern boundary, to a new 400/132kV Main Transmission Substation (MTS) that is located 3.45km south of the Project PV site.

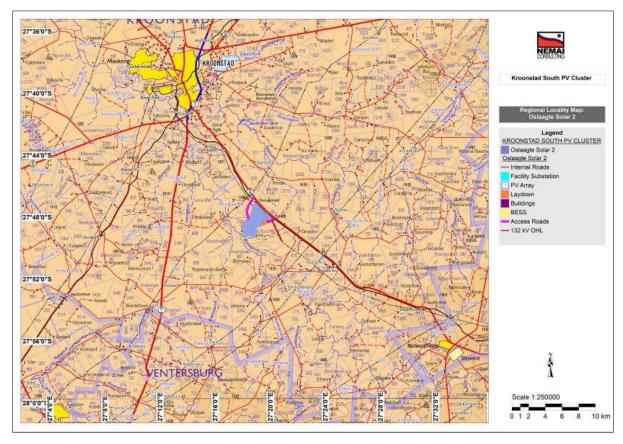


Figure 1: Oslaagte Solar 2 Project Locality south of Kroonstad (Nemai 2023)

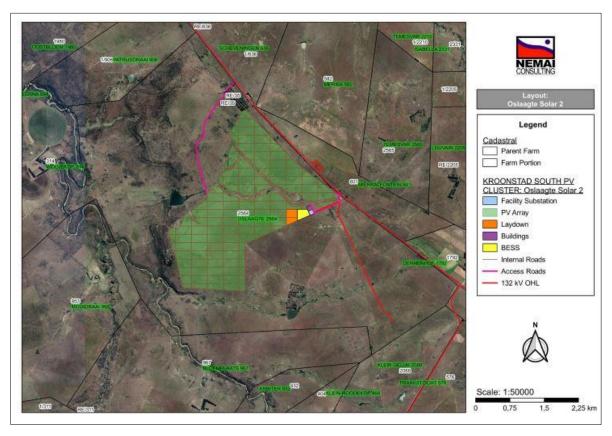


Figure 2: Oslaagte Solar 2 PV Project - Layout Alternative 1 (Nemai 2023)



Figure 3: Oslaagte Solar 2 PV Project - Layout Alternative 2

4.2 Project Technical Details

4.2.1 Solar Technology

Solar energy facilities operate by converting solar energy into a useful form (i.e. electricity). The use of solar energy for electricity generation is a non-consumptive use of a natural resource and consumes no fuel for continuing operation. Solar power produces an insignificant quantity of greenhouse gases over its lifecycle as compared to conventional coal-fired power stations. The operational phase of a solar facility does not produce carbon dioxide, sulphur dioxide, mercury, particulates, or any other type of air pollution, as fossil fuel power generation technologies do.

4.2.2 PV Technology Overview

PV technology produces direct current (DC) which is then converted to alternating current (AC) via power electronic inverters. The main technology categories are crystalline modules (mono or poly), thin film, and concentrated photovoltaics (CPV). **Figure 4** below, provides an overview of a typical Solar PV Power Plant.

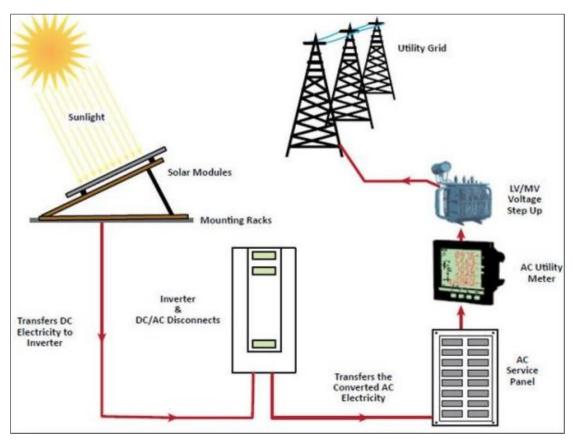


Figure 4: Overview of Solar PV Power Plant (International Finance Corporation, 2015. Utility-Scale Solar Photovoltaic Power Plan.)

4.2.3 Overview of Technical Details: Oslaagte 2 Solar PV project

The technical details of the proposed Solar PV Plant are captured in Table 1 below.

Table 1: Technical details of the proposed PV Plant

No.	Component	Alternative 1 - Description / Dimensions	Alternative 2 - Description / Dimensions
1.	Height of PV panels	Up to 5 m	Up to 5.5 m
2.	Facility generation capacity (MW)	120 MW	Up to 240 MW
3.	Area of PV Array	Up to approximately 218,8 ha	Monofacial or Bifacial PV panels, mounted on either fixed-tilt, single-axis tracking, and/or double-axis tracking systems. Up to 325 ha
4.	Area occupied by substations	Up to 1 ha	Up to 1 ha
5.	Capacity of on-site substation	High voltage (132 kV)	The facility substation will collect the power from the facility and transform it from medium voltage (up to 33kV) to high voltage (132 kV).
6.	BESS	Area up to ± 4ha	Area up to ± 4ha
7.	Area occupied by both permanent and construction laydown areas	Temporary: Up to 5ha Permanent: Up to 1 ha (located within the area demarcated for temporary construction laydown)	Temporary: Up to 5ha Permanent: Up to 1 ha (located within the area demarcated for temporary construction laydown)
8.	Area occupied by buildings	Up to 1 ha	Up to 1 ha
9.	Length of internal roads	Up to 17 km	Up to 17 km
10.	Width of internal roads	The internal roads will be up to 6 m wide. The access roads will be up to 8 m wide.	The internal roads will be up to 6 m wide. The access roads will be up to 8 m wide.
11.	Proximity to grid connection	±7.30 km	±7.30 km
12.	Height of fencing	Up to 3.5m	Up to 3.5m
13.	Type of fencing	Type will vary around the site, welded mesh, palisade and electric fencing	Type will vary around the site, welded mesh, palisade and electric fencing

4.2.4 Project Layout

The layout alternatives for the Solar PV Plant are shown in **Figure 2** (Alternative 1) and **Figure 3** (Alternative 2), above. The desirability of the earmarked site for the development of the proposed Solar PV Plant is due to the following key characteristics:

- Solar Irradiation: The feasibility of a solar facility is dependent on the direct solar irradiation levels
- Topography: The suitability of the surface area is an important characteristic for the construction and operation of solar facilities. Most of the site has a low gradient slope and is suitable for this development.
- Grid connection: The electricity generated by the Project will be transmitted through a 132kV power line from the new facility substation to a new 400/132 kV Main Transmission Substation (MTS).
- o Extent of site: The overall extent of the site is sufficient for the installation of the PV facility.
- o Site access: The site can be accessed via the R76, which runs along the eastern boundary of the site.

4.2.5 Components of the Proposed Solar PV Plant

The Project consists of the following systems, sub-systems or components (amongst others):

- PV modules and mounting structures which will consist of either Monofacial or Bifacial PV panels, mounted on either fixed-tilt, single-axis tracking, and/or double-axis tracking systems.
- 132kV power line that is 3.45km in length.
- Inverter stations, transformers, switchgear and internal electrical reticulation (underground cabling).
- Battery Energy Storage System (BESS), potentially Lithium Battery Technologies, with an area up to 5ha.
- Facility grid connection infrastructure, including:
 - 33kV cabling between the project components and the facility substation;
 - A 132kV facility substation. The maximum size of the facility substation will not exceed 1 ha.
 The facility substation will collect the power from the facility and transform it from medium voltage (up to 33 kV) to high voltage (132 kV).
 - 33kV or 132kV cabling or powerline between the facility substation and the proposed Main Transmission Substation or the Kroonstad Switching Station.
- Temporary construction laydown area up to seven (7) ha and permanent laydown area up to 1 ha (to be located within the area demarcated for the temporary construction laydown).
- Internal roads will be up to 6 m wide, to allow access to the Solar PV modules for operations and maintenance activities.
- Main access road is up to 8 m wide. The site is accessible via the R76.
- Operation and Maintenance buildings including a gate house and security building, control centre, offices, warehouses and workshops for storage and maintenance. The buildings will occupy an area of 1.5ha.
- Fencing around the PV site to a height of 3.5m.

5 STATUS QUO ANALYSIS

5.1 General Existing Condition of Receiving Environment

The Oslaagte Solar 2 PV project area is situated on the middle portion of the farm Oslaagte 2564. A railway line runs along the eastern boundary of the site, adjacent to the R76 road. The general area is covered with a combination of acacia thickets and grassland which varies from shorter to long dense grass. Several farm dams occur and there are several outcrops of sandstone. There are also many termite mounds as well as animal burrows occurring on the property. The topography varies from relatively flat to gently undulating. The areas affected by the proposed Project footprint are rural in nature. The Project's PV Site is vacant and was historically used for agricultural purposes. The property is currently used for cattle grazing with some game (gemsbok and springbok) present as well. The south-eastern section of the project area contains a small electricity substation situated adjacent to the eastern boundary.



Figure 5: View of the vegetation and terrain in the north-central section of the project footprint area



Figure 6: General view of the grassland and shrubs, with a termite mound in the lower left-hand corner



Figure 7: View of the long dense grass vegetation on the south-central section of the project footprint,



Figure 8: View showing the mixed grassland and acacia vegetation over large portions of the project footprint



Figure 9: View of existing powerline and grassland vegetation in the south-eastern section of the project footprint

5.2 <u>Cultural-Heritage Receiving Environment</u>

5.2.1 DFFE Environmental Screening Tool

The DFFE Environmental Screening Tool was accessed for information on the cultural-heritage sensitivity as well as the palaeontological sensitivity of the general region. This tool indicated that the Archaeological and Cultural Heritage Sensitivity of the general region is Low (**Figure 10**). However, the palaeontological sensitivity of the geology of the surrounding area is indicated as Very High (**Figure 11**).

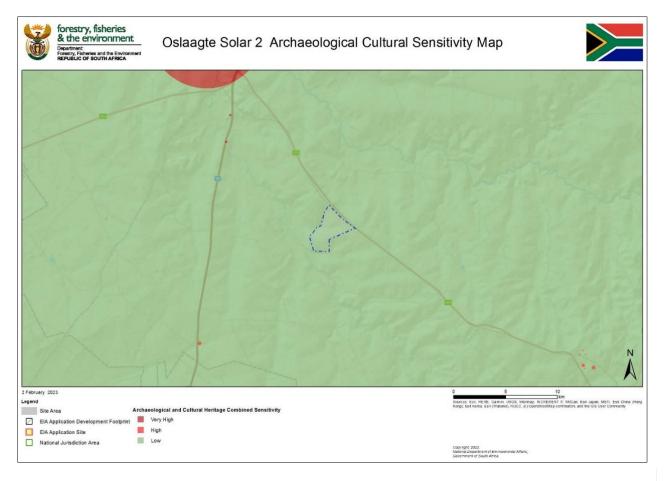


Figure 10: Archaeological Cultural Sensitivity map indicating that the project footprint is located within a region of low heritage sensitivity (DFFE Screening Tool).

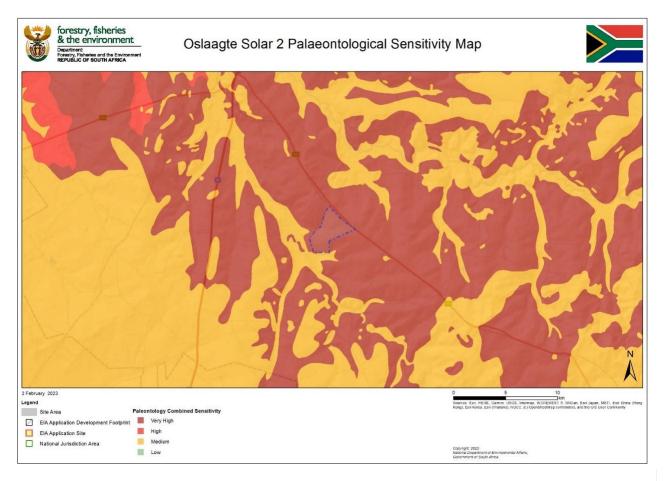


Figure 11: Palaeontological Sensitivity map indicating that the project footprint is located within a region with Very High sensitivity (DFFE Screening Tool)

5.2.2 Historical Background of Surrounding Region (archaeological and historical literature survey)

The Free State is rich in archaeological and historical resources and includes significant aspects such as Later Stone Age rock art, Battlefields and Iron Age stonewalled enclosures. Historically, the general region of the project area was a frontier region where San hunter-gatherers, Nguni and Sotho-Tswana agro-pastoralists, Dutch Voortrekkers and British Colonists all interacted.

The archaeological history of the area can be divided into a Stone Age, Iron Age and Historic or Colonial Period. An overview of the general region is presented below.

The Stone Age

The Earlier Stone Age (ESA) is the first and oldest phase identified in South Africa's archaeological history and the material culture of the earliest people comprises two technological phases. The earliest of these is known as Oldowan and is associated with crude flakes and hammer stones. It dates to approximately two million years ago. The second technological phase is the Acheulian which is comprised of more refined stone artefacts such as the cleaver and bifacial hand axe. The Acheulian dates to approximately 1.5 million years

ago. No ESA sites are known from the study area and surrounding region (Fourie 2021; Angel and Kitto 2018).

The Middle Stone Age (MSA) material culture is associated with flakes, points and blades manufactured by means of a technique known as the "prepared core" technique. This phase is furthermore associated with modern humans and complex cognition (Wadley, 2013). research fieldwork by the National Museum in Bloemfontein, recorded ten sites where MSA and/or Later Stone Age artefacts were identified in association with mammal fossil remains from erosion channels along the Sand, Vet and Doring Rivers (De Ruiter *et. al.* 2011, Fourie 2021; Angel and Kitto 2018).

The Later Stone Age (LSA) is the third archaeological phase and is characterised by very small stone tools known as microliths. This period is associated with hunter-gatherers (San) as well as early pastoralists (Khoekhoe) and lasted until the arrival of Iron Age and European communities (in some areas, for a considerable period). Apart from the occurrence of LSA stone tools along the Sand, Vet and Doring Rivers (see above), no other LSA are known from the surroundings of the study area.

The Later Stone Age is also associated with the production of rock engravings and rock paintings. Rock engravings are known from the wider vicinity of the study area (Bergh, 1999). The closest rock art site in the general area is Spitskop. Spitskop is located 12 km west of Verkeerdevlei on the link road to the N1 in the Brandfort District. The Spitskop site consists of three San or 'Bushman', as well as Khoe or 'Khoi' rockengraving sites located on adjacent farms, which are all relatively close to a sandstone mountain known as Spitskop. There are images of eland, geometric forms, human figures, and ostrich (Ouzman, S. 2001); http://www.nasmus.co.za/departments/rock-art/public-rock-art-sites).

The Iron Age

The Iron Age in South Africa (c.AD 1600 – c.AD 1840) is associated with pre-colonial farming communities and includes both agricultural and pastoralist farming activities, metal working, and the occurrence of stone-walled settlements known as the 'Central Cattle Pattern' (Huffman, 2007) as well as cultural customs such as lobola . According to the distribution map for Iron Age settlements on the Southern Highveld as published in Maggs (1976:38-39), the project area is located within the western boundary of the known distribution of such Late Iron Age sites. The distribution maps as published by Huffman (2007) also indicate that the project area is located very close to the periphery of two Iron Age ceramic typological sub-groups known as facies. These two Iron Age facies are known as Thabeng and Makgwareng.

The Thabeng facies of the Moloko Branch of the Urewe Tradition is one of the sub-groups identified within the study area. The decoration on the ceramics associated with this facies is characterised by incised triangles, coloured chevrons and arcades. The Tlhaping at Dithakong, Rolong at Platberg and the Kubung from the Free State form a Southwestern Sotho-Tswana cluster that is associated with this Thabeng facies pottery and so-called 'Type Z' settlement layouts (Huffman, 2007). The Type Z settlements are one of the Late Iron Age stonewalled settlement types identified initially by Tim Maggs during his extensive archaeological research project on the Iron Age of the southern Highveld (Maggs, 1976), which includes the current project area. These Type Z sites are characterised by large primary enclosures surrounded by dwellings which are comprised of two sections or lobes, one being larger than the other. Each of these

'bilobial' dwellings comprises a hut at the front with a semi-circular courtyard at the back. While several Type Z sites are located within the general region of the project area, one of the more well-known ones is OXF1, situated a short distance north-west of the town of Ventersburg. Ventersburg is located approx.45km south of Kroonstad. This site was excavated by Tim Maggs during the 1970s as part of his overall research project (Maggs, 1976).

The next known Iron Age period within the surroundings of the study area is represented by the Makgwareng facies of the Blackburn Branch of the Urewe Ceramic Tradition (Huffman 2007). The decoration on the ceramics from this sub-group is characterised by finely stamped triangles, rim notching and appliqué (Huffman, 2007). This sub-group developed from Ntsuanatsatsi south of the Vaal River and can be associated with the so-called 'Type V' stone walling settlement type (Huffman, 2007). Dreyer (1990) also conducted excavations on Type V Late Iron Age stonewalled settlements which are located a short distance south-west of Winburg, which is approx. 100km south of Kroonstad. The Type V settlements comprise a central core of cattle enclosures surrounded by beehive type huts. Corbelled stone huts are also associated with this walling type. They are low stone huts located at the edge of the cattle enclosures (Huffman 2007).

The best-known site of this type found within the surroundings of the study area, is a site known as "Early Sotho Settlement, Waterval, Sandrivierhoogte" that was originally declared a National Monument and which is now registered as a Provincial Heritage Site in terms of the National Heritage Resources Act (No 25 of 1999). The site is located roughly 42km south-east of the current study area. The original declaration as a national monument was on 17 December 1982. In the declaration, the site is described as a "Leghoya Village", comprising corbelled huts and stonewalls (Govt. Gazette No. 8481, 1982).

Historical/Colonial Period

From roughly the 1820s there was a period characterised by conflict across the Southern Highveld. This resulted from the migration of three Nguni groups from the current Kwazulu-Natal province into the present-day Free State province which was a result of the expansion of the Zulu kingdom under King Shaka. The three Nguni groups were the Hlubi of Mpangazitha, the Ngwane of Matiwane and the Khumalo Ndebele (Matabele) of Mzilikazi. The migrations of all three groups would have had a definite impact on the northern Free State (Fourie 2021).

During the early Colonial Period (early 1800s) the study area and surroundings became known as Transorangia. The people called the Griqua had moved into the area in the years prior to 1804. Then a few white Trekboers started moving across the Orange River from the Cape Colony in search of better grazing for their livestock during times of drought. At first the farmers requested permission from the Cape authorities before crossing the river. However, later groups moved into the Transorangia region without permission (Fourie 2021, citing Schoeman, 1980). During the 1830s, this occasional movement developed into a mass migration of Afrikaner families from the Cape Colony to the interior. This mass migration became known as the 'Great Trek' and the families were known as Voortrekkers (Fourie 2021, citing Visagie, 2011). The first Voortrekker party of some 70 wagons crossed over the Orange River during early 1836. More groups followed and established themselves along the Vet River (Fourie 2018, citing Schoeman, 1980).

In 1841 the town of Winburg was established on the banks of the Vet River. It was laid out on the farm Waaifontein in 1841 and became a municipality in 1872. Raper (2014) notes that the name was originally spelt 'Wenburg', which means 'town of winning'. He considers that this original spelling may refer to a military victory over the Matabele at Mosega on 17 January 1837, or to the triumph of those residents of the town who were in favour of Waaifontein as the site of the town (Raper 2014). After the annexation of Natal by the British in 1843 and the subsequent dissolution of the Voortrekker Republic of Natalia, Winburg became the capital of the Voortrekkers in what is today known as the Free State (Erasmus, 2014). Winburg is located nearly 83km south-west of the project area.

In 1846, Major H.D. Warden was appointed British Resident of the area between the Orange and the Vaal rivers, to maintain peace between the various population groups. In 1848, General Harry Smith annexed the area between the Orange and Vaal rivers as British territory and named it the Orange River Sovereignty. However, due to ongoing conflict between the Boers, the Griqua and the Basotho people, the British government subsequently withdrew from the Orange River Sovereignty in 1854 and the area became an Afrikaner republic, the Orange Free State, with J.P. Hoffman as first Afrikaner State President and Bloemfontein as the state capital (Afrikaans community 1820-1899 | South African History Online (sahistory.org.za)).

On 16 January 1852, the Sand River Convention was signed between the British Government and the Transvaal Boers. This convention formally recognised the existence and independence of a Boer Republic north of the Vaal River by the British Government, namely the Zuid-Afrikaansche Republiek (South African Republic). The site where the signing of the convention took place, was declared a monument and for many years was marked by a stone cairn and plaque (Fourie 2021, citing Oberholster, 1972). The site is located near the bridge where the N1 highway passes over the Sand River and is located approximately 53.36 km south- west of the present project area.

The Town of Kroonstad was laid out on the farm Klipplaatsdrift in 1855. It is generally accepted to have been named after Kroondrift, a ford on the Vals /Valsch River, so called because a horse named Kroon broke its leg there (Raper 2014).

After the end of the Anglo-Transvaal War (also referred to the First South African War) which ended the two-year British annexation of the Zuid-Afrikaansche Republiek (ZAR), the Pretoria Convention of 1881 redefined the western boundary of the ZAR which was moved from the Makwassie Spruit to roughly the Harts River. In 1884, the western boundary of the ZAR was again moved further west following the recommendations of the London Convention (Bergh, 1999).

The railway line between Bloemfontein and Johannesburg was built during the early 1890s, and eventually reached Johannesburg during September 1891 and Pretoria in January 1892 (Fourie 2021, citing Schoeman, 1980).

The Second South African War (1899 - 1902) was fought between the Boer Republics of the Transvaal and Free State against Great Britain, but the victims and participants of the war were not excluded to British or Boer citizens alone.

During this war, a concentration camp was located at Kroonstad, somewhere in the vicinity of the Valsch Rivier. This was at first divided into two sections, with people from the Lindley district on the south side of the river and those from other districts on the north side. However, flooding of the river cut off the Lindley people completely and made it impossible to provide them with rations, so the Lindley people were transferred to the main section on the south of the river. The camp at Kroonstad seems to have been formed between September and November 1900. Quite a few farms had been burnt by 1900, resulting in a substantial influx of homeless families into the town. A camp for black people was also established but information on the location and other details is lacking (British Concentration Camps of the South African War 1900-1902 (uct.ac.za).

At the beginning of the First World War (1914-1918), when the South African Government of General Louis Botha notified Great Britain of their willingness to support that country against Germany, several former Boer Generals who disagreed strongly with this decision, such as Christiaan de Wet, J.C.G. Kemp and General Christiaan Frederik Beyers, led an armed rebellion. An incident which occurred close to Kroonstad was an attempt by De Wet with about 1500 or more men to capture the railway station at Virginia, roughly 55km southwest of Kroonstad, which was held by about 250 government troops. The troops held off the rebels until government reinforcements and a train arrived (The-Boer-Rebellion-in-South-Africa-pdf.pdf (moltenofamily.net). Several casualties of the Rebellion are buried in the old Kroonstad Cemetery (SJ de Klerk 2021, Battlefields Route — Koppies to Kroonstad | The Heritage Portal).

In 1975, Winnie Mandela was incarcerated at the Kroonstad Prison. In February 1975, her husband, the late Nelson Mandela, wrote her a letter where he was encouraging her not to let Prison break her down (Kroonstad | South African History Online (sahistory.org.za)).

In 2014 the Kroonstad Correctional Centre was officially renamed to the 'Bizzah Makhate Correctional Centre". This name pays tribute to the late Comrade; Wilfred Sefularo 'Bizzah' Makhate who was incarcerated at this facility in the eighties (https://www.gov.za/kroonstad-correctional-centre-officially-renamed-bizzah-makhate-correctional-centre).

Reverend Zaccheus Richard "ZR" Mahabane, lived and worked in Kroonstad for most of his lengthy career, and is buried in Seeisoville Cemetery in Maokeng, although he was born in Thaba Nchu. Rev. Mahabane was one of the Founding Fathers of the ANC and was elected ANC President in 1924. He constantly strove for black unity and together with Mr A Abdurahman established the non-European Unity Movement (NEUM) between 1927 and 1934. In 1935 he served as an executive committee member of the All Africa Convention (AAC), a federal body that gave expression to the aspirations of black people and fought against the Native trust and Land Act promulgated in 1936. He was elected as ANC President for the second time from 1936 – 1940. He also played a prominent role in the development of the Methodist Church in South Africa and helped draft the church's constitution and define the equal status of all in the church (Verwey 1995, SA History Online). His grave in Seeisoville Cemetery was recently declared as a National Heritage Site (Govt. Gazette Notice No.380 2019).

5.2.3 Cartographic findings

An assessment of available historical topographical maps was undertaken to establish a historic layering for the study area. Overlays of the maps were made on Google Earth. These historic maps are valuable resources in identifying possible heritage sites and features located within the study area. It should be noted that the earliest edition of the map sheet for this area dates to 1960, therefore, it was not considered necessary to examine the later edition map sheets. Any heritage resources that are 60 years or older would be depicted on the 1960 edition sheet.

The topographical map was obtained from the Department of Agriculture, Land Reform and Rural Development (DALRRD) in Cape Town

The following 1:50 000 map sheet was assessed for the Oslaagte Solar 2 footprint: 2727CD Wonderhoek Edition 1 1960. The map was surveyed in 1960 and drawn in 1962 by the Trigonometrical Survey Office of the Republic of South Africa from aerial photographs taken in 1951.

As can be seen in **Figure 12** and **Figure 13** below, the 1960s edition map depicts one heritage feature within the Oslaagte Solar 2 footprint, which is a graveyard. Two features are located adjacent to the project footprint. One is a group of homesteads and the other is a group of four structures marked adjacent to the railway line, outside the north-west corner of the footprint. Two homesteads are depicted at the south end of the powerline (not shown in the figures). The features depicted will be at least 63 years old.

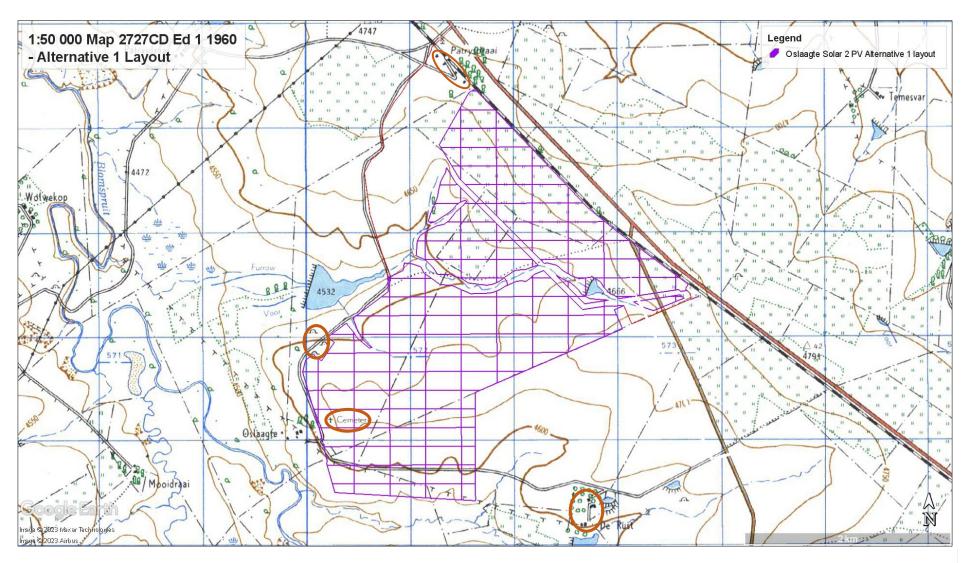


Figure 12: Enlarged view of topographic map 2727CD Ed 1 1960, depicting one heritage feature which is a graveyard within the Oslaagte Solar 2 PV footprint – Alternative 1. Two features are located adjacent to the project footprint. One is a group of homesteads. The other is a group of four structures in the area adjacent to the railway line, outside the north-west corner of the footprint. All features are marked by orange polygons.

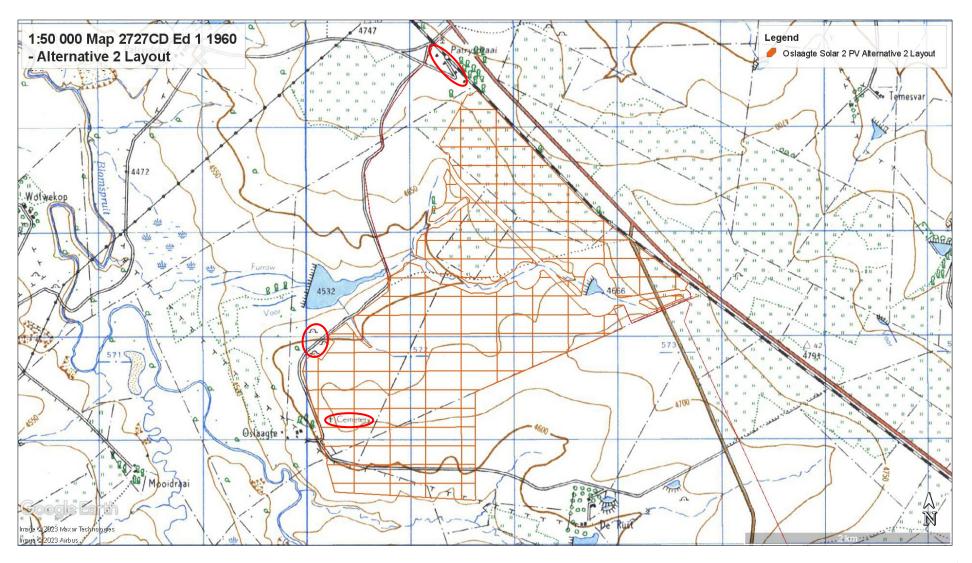


Figure 13: Enlarged view of topographic map 2727CD Ed 1 1960, depicting one heritage feature (a cemetery) within the Oslaagte Solar 2 PV footprint – Alternative 2. Two features are depicted just outside the boundary of the footprint: one is a group of homesteads, the other is a group of four structures located adjacent to the railway line, immediately outside the north-east corner of the footprint. The powerline is not included in this view. All features are marked by red polygons

5.3 Previous HIA reports in the area

A search on the South African Heritage Resources Information System (SAHRIS) has identified several Heritage Impact Assessments conducted in and around the study area.

Fourie, W. 2021. HIA for *The Proposed Harmony Fss6 Reclamation Pipeline, Welkom, Free State Province*. During the survey, no heritage sites were identified.

Lavin, J. 2020. Archaeological Specialist Study In terms of Section 38(8) of the NHRA for a Proposed development of the Vrede and Rondavel Solar Energy Facilities near Kroonstad, Free State Province. Two Later Stone Age scatters and one isolated flake were identified within the area proposed for the Rondavel SEF. A series of four stone cairns were also identified, as possible graves.

Van der Walt, J. 2019. Heritage Desktop Report Lengana Health SA Prospecting Application, Koppies, Free State Province. The proposed prospecting activities were located on Felix 318, Goedgunst 315, Kronenbloem 51, Ventersbloem 163, Oceaan 64, Oceaan 99, Broodkop 304, Enkelsbosch 31, Hooge Bult 542, Geluk 237, Verdeel 278, Goudlaagte 238, Ongegund 507. The desktop study noted that structures of unknown age occur within the prospecting right area, no stone walled settlements were visible on aerial images consulted and no known graves occur in the study area, although informal graves could be expected in the study area.

Angel, J and J Kitto. 2018. Kophia Diamonds (Pty) Ltd Catherine's Fancy 831, which forms part of the Blaauwbosch Mine, Boshof District, Free State Province Heritage Impact Assessment. The HIA was necessitated by the discovery of skeletal material during mining activities on the farm Catherine's Fancy. Seven heritage resources were located, not including the accidentally discovered burial ground. These included three Middle Stone Age sites and four historical structures.

De Bruyn, C. 2018. Basic Assessment Report for the Prospecting Right and Environmental Authorisation Application for Kroonstad South Situated in the Free State Province. A graveyard with several marked and unmarked graves as well as two historical farmhouses were found within the project area.

De Jong, RC. 2011. Specialist Study: Heritage Impact Assessment for the Installation of the Sirius Fibre Optic Cable between Johannesburg and Yzerfontein, Gauteng, Free State, Eastern and Western Cape Provinces. The cable corridor included the section of the N1 roads between northern Johannesburg and Bloemfontein via Kroonstad, Ventersburg and Winburg. No significant heritage resources were identified along the N1 in the Kroonstad area.

5.4 <u>Desktop Palaeontological sensitivity</u>

Note that this section was compiled by the author and not by a palaeontological specialist. A basic palaeontological sensitivity was determined using the SAHRIS South African Palaeontological Sensitivity Map (http://www.sahra.org.za/sahris/map/palaeo). This map indicates that the Oslaagte Solar 2 PV project footprint falls within an area of Very High (red colour) fossil sensitivity (see **Figure 14** below). The different palaeontological sensitivities that are defined on the SAHRIS Palaeontological Sensitivity Map, are outlined

in the table below. A separate desktop palaeontological assessment has been undertaken by a professional palaeontologist.



Figure 14: SAHRIS Palaeo-sensitivity map overlain on the Oslaagte Solar 2 PV project footprint (purple polygon). The underlying geology is shown as having Very High fossil sensitivity (red).

Table 2: SAHRIS Fossil Map Palaeontological Sensitivity Ratings and Required Actions

Colour	Sensitivity	Required Action	
RED	VERY HIGH	Field assessment and protocol for finds is required.	
ORANGE/ YELLOW	HIGH	Desktop study is required and based on the outcome of the desktop study; a field assessment is likely to be requested.	
GREEN	MODERATE	Desktop study is required.	
BLUE	LOW	No palaeontological studies are required however a protocol for finds is required.	
GREY	INSIGNIFICANT /ZERO	No palaeontological studies are required.	
WHITE/CLEAR	UNKNOWN	These areas will require a minimum of a desktop study. As more information becomes known, SAHRA will continue to populate the map.	

5.5 Findings of the Historical Desktop Study

The general overview from the historical desktop study has shown that various archaeological and historical resources can be expected to occur in the project area. Furthermore, the examination of the earliest edition (1960) of the 1:50 000 topographical maps overlain with the project footprint has shown that at least two specific heritage features, one being a graveyard. could be present within the project area footprint.

The Site Survey fieldwork provided confirmation of some of the heritage resources occurring within and close to the project area footprint, specifically the graveyard.

6 SITE SURVEY/FIELDWORK RESULTS

The survey of the Oslaagte Solar 2 project footprint took place over one day (07 January 2023) by the author (heritage specialist) and an assistant. A vehicle was used to access the project footprint area and the survey was conducted both by vehicle and on foot (at selected areas). The survey covered as much of the project footprint area as was feasibly accessible, given the long grass and dense acacia thicket in several areas, as well as certain sections which contained many animal burrows and termite mounds, which limited accessibility. Some areas could not be accessed due to the gates being locked.

The author used a Global Positioning System (GPS) application to navigate access roads in the study area and for recording the tracklog of the survey and waypoints of the identified heritage resources. A Sony digital camera was used for photographic recording of identified heritage resources and general images of the project study area.

The survey aimed to find and identify archaeological and other heritage resources such as burial grounds and graves (BGG), archaeological material or sites, historic built structures or remains and landscape features of cultural heritage significance. The inspection identified a total of four heritage resources situated within or adjacent to the project area footprint. Two of these sites are recent/modern structures (Os2-01 and Os2-03), one is the graveyard depicted on the 1960 topographic map (Os2-04) and one comprises several clusters of rocks likely to be the remains of an African homestead (Os2-02). A fourth site was identified a short distance to the north of the project footprint, which is the demolished remains of several railway houses.

Identified Heritage Sites

Site Name	Os2-01_Structure	
GPS Coordinates	27°48'18.22"S, 27°19'21.27"E	
Site Description	A redbrick and concrete structure, which seems to be a water tank support is located here.	
Approximate Age	Recent/modern structure	
NHRA, No. 25	N/A	
Field Grading and Ratings		
Site context and description	The structure is situated in the central area of both the proposed Alternative 1 and Alternative 2 footprints (within the PV solar area layout). However, the impact will not be significant.	
Site Density	One brick and concrete structure	
Uniqueness	Low	
Heritage Significance	Low - GP.C/ NCW	
Mitigation	No mitigation is required.	



Figure 15: View of support structure for water tank (Site Os2-01)

Site Name	Os2-02_Homestead	
GPS Coordinates	27°48'20.36"S, 27°19'22.24"E	
Site Description	The site comprises a scattered group of sandstone rocks/stones that form the collapsed remains of several structures, possibly a homestead. The remains are located on a sandstone outcrop. Extent approx. 31mx15m.	
Approximate Age	Unclear if the site is more than 60 years old as nothing is depicted on the 1960s map	
NHRA, No. 25	Section 34 of the Act (Section 36, potential infant graves).	
Field Grading and F	Ratings	
Site context and description	The structure remains are situated in the central area of the proposed Alternative 1 and Alternative 2 footprints (within the PV array layout). If this is the remains of a homestead, then infant burials could be present. Nothing is depicted in this location on the 1960 topographic map 2727CD.	
Site Density	The number of the collapsed structures could not be identified. More building remains could be present.	
Uniqueness	Low	
Heritage Significance	IIIC / GP.C- Low (demolished structures); IIIB / GP.A - High (possible infant graves – to be confirmed)	
Mitigation	The site should be avoided with at least a 30m buffer as a "no go" area. The Alternative 2 Layout has been designed to avoid this area. No additional mitigation is required unless the site will be impacted.	



Figure 16: View of Os2-02, looking north



Figure 17: Another view of the rock clusters, looking south

Site Name	Os2-03_Structure	
GPS Coordinates	-27°48'24.26"S, 27°20'29.49"E	
Site Description	The site is a building constructed of yellow/tan bricks, comprising part of an electrical substation.	
Approximate Age	It is probably younger than 60 years (not depicted on the 1960 map)	
NHRA, No. 25	N/A	
Field Grading and R	Ratings	
Site context	The site is situated outside of the PV layout area for both Alternative 1 and Alternative 2 footprints.	
Site Density	One modern/recent substation building	
Uniqueness	Low	
Heritage Significance	IIIC / GP. C - Low/ NCW	
Mitigation	No mitigation is required.	



Figure 18: View of western elevation of the substation building, Os2-03



Figure 19: View of northern end of the substation building, showing swallow/ swift colony nests

Site Name	Os2-04_Graveyard	
GPS Coordinates	27°49'5.46"S, 27°18'22.89"E	
Site Description The site is a formal graveyard containing six graves of the Botha family. The graves date 1925 (oldest) to 1983 (youngest). Extent approx. 555m²/0.5ha.		
Approximate Age	Oder than 60 years. A graveyard is depicted in this location on the 1960 topographic map.	
NHRA, No. 25	Section 36 of the Act	
Field Grading and R	Ratings	
Site context	The graves all belong to the Botha family, the oldest date of death inscription is 1925 youngest is 1983. The graveyard is fenced, with no gate. It is situated within the west boundary of the Oslaagte Solar 2 PV footprint and within the PV array area for Alternative 1 and Alternative 2 (however the Alt. 2 layout does avoid this site).	
Site Density	The graveyard comprises six formal graves.	
Uniqueness	Low	
Heritage Significance	IIIA/ GP.A - High	
Mitigation	The site should be avoided with a buffer of at least 30-50m and demarcated clearly as a "no go" area. Provision should be made for visitation access by the family. Social consultation should be undertaken to identify any surviving family members and determine their wishes regarding the graves. The graves can be relocated subject to the family's consent. This will require a permit from the responsible Heritage Authority (SAHRA) as well as the responsible Health authorities and should be undertaken by an archaeologist experienced in grave relocations.	



Figure 20: View of the Botha family graveyard, showing the fence and dense vegetation



Figure 21: View of the Botha family graves, from inside the fenced area



Figure 22: View of the oldest Botha grave in the graveyard (date of death 1925)



Figure 23: View of the second oldest grave, (date of death 1930)



Figure 24: View of the most recent grave in the graveyard (date of death 1983)

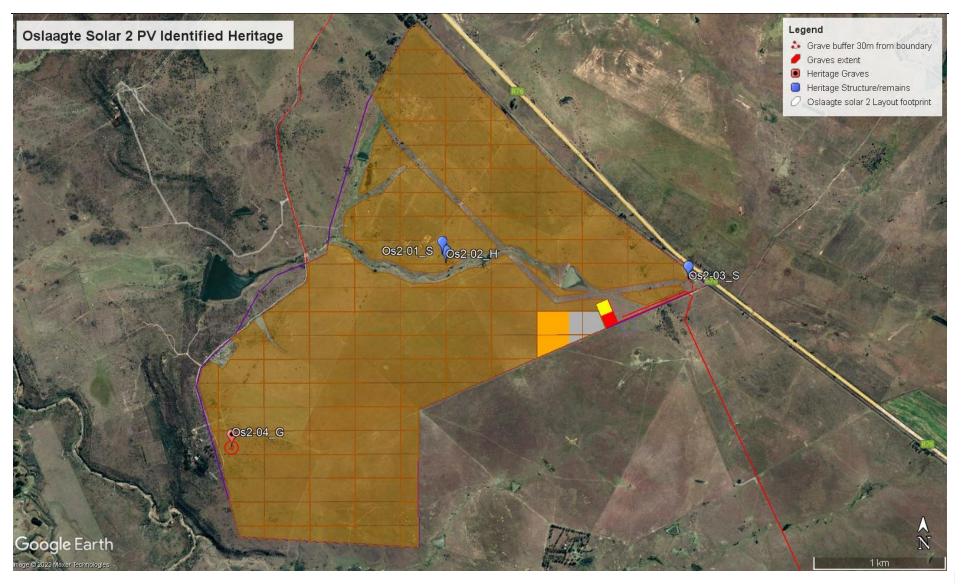


Figure 25: Heritage resources identified during the site survey and overlain on the project layout – Alternative 1 (blue icon = Structure or Homestead, red icon = grave)

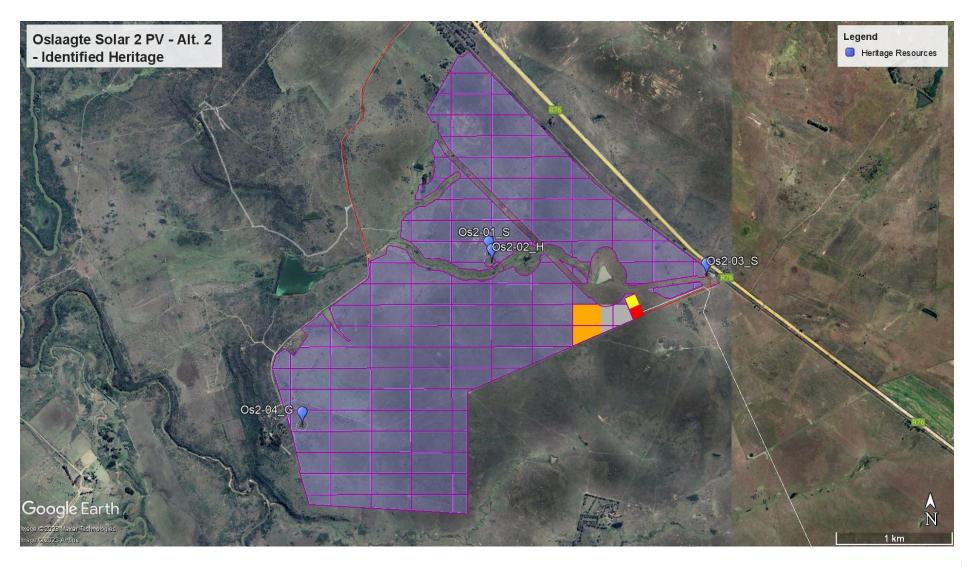


Figure 26: Heritage resources identified during the site survey and overlain on the project layout – Alternative 2 (blue icon =heritage resource)

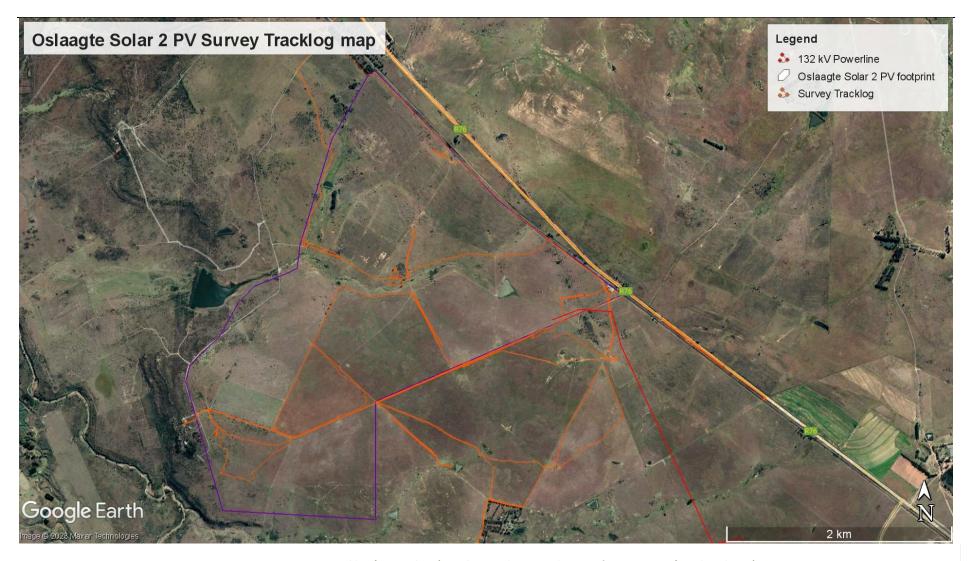


Figure 27: Site Survey Tracklog (orange lines) overlain on the general project footprint area (purple polygon)

7 SIGNIFICANCE ASSESSMENT

7.1 Methodology for Assessing Heritage Site Significance

The applicable maps, tables and figures are included, as stipulated in NHRA and NEMA. The HIA process consists of three steps:

Literature Review

The desktop literature review provided information on the Heritage Background of the general region and project area. This included investigating published sources as well as past HIA studies conducted for the project area and surrounding region. An examination of the relevant historical 1:50 000 topographical map and/or archival maps (if available) was also undertaken. The relevant early editions of the 2727CD topographical map sheets were obtained from the Department of Rural Development & Land Reform, Cape Town.

Several internet sites were also accessed for information including ,amongst others, the website of SA History Online (https://www.sahistory.org.za), and the concentration camp database website of the University of Cape Town (British Concentration Camps of the South African War 1900-1902 (uct.ac.za)

Literature resources accessed are listed in Table 3.

Table 3: Literature sources accessed

Source	Information
Background Information Document - Nemai	Project location and description details
Published and unpublished sources and Past HIAs	Historical and archaeological background on Kroonstad and surrounding region
Directorate: National Geo-spatial Information of the Department of Rural Development & Land Reform, Cape Town	Historical topographic map 1:50 000, 2727CD Wonderhoek Edition 1 1960.

Field Survey

A physical Site Inspection or Field Survey was then conducted predominantly by vehicle and on foot through the project area by an experienced heritage specialist and an assistant. This focussed on identifying and documenting heritage resources situated within and immediately adjacent to the proposed project area footprint.

HIA Report

The final step involved the recording and documentation of the identified heritage resources, the assessment of such resources in terms of heritage significance and impact assessment criteria, producing a heritage sensitivity map and compiling the heritage impact assessment report with constructive recommendations for mitigation, if required.

Impacts on these sites by the development will be evaluated as follows:

Site Significance

Site significance classification standards use is based on the heritage classification of s3 in the NHRA and developed for implementation keeping in mind the grading system approved by SAHRA for archaeological impact assessments. The update classification and rating system as developed by Heritage Western Cape (2021) is implemented in this report.

Site significance classification standards prescribed by the Heritage Western Cape Guidelines (2016), were used for the purpose of this report (**Table 4** and **Table 5**).

Table 4: Rating system for archaeological resources

Grading	Description of Resource	Examples of Possible Management Strategies	Heritage Significance
1	Heritage resources with qualities so exceptional that they are of special national significance. Current examples: Langebaanweg (West Coast Fossil Park), Cradle of Humankind	May be declared as a National Heritage Site managed by SAHRA. Specific mitigation and scientific investigation can be permitted in certain circumstances with sufficient motivation.	Highest Significance
II	Heritage resources with special qualities which make them significant, but do not fulfil the criteria for Grade I status. Current examples: Blombos, Paternoster Midden.	May be declared as a Provincial Heritage Site managed by Provincial Heritage Authority. Specific mitigation and scientific investigation can be permitted in certain circumstances with sufficient motivation.	Exceptionally High Significance
III	Heritage resources that contribute to the environmental quality or cultural significance of a larger area and fulfils one of the criteria set out in section 3(3) of the Act but that does not fulfil the criteria for Grade II status. Grade III sites may be formally protected by placement on the Heritage Register.		
IIIA	Such a resource must be an excellent example of its kind or must be sufficiently rare. Current examples: Varschedrift; Peers Cave; Brobartia Road Midden at Bettys Bay	Resource must be retained. Specific mitigation and scientific investigation can be permitted in certain circumstances with sufficient motivation.	High Significance

Grading	Description of Resource	Examples of Possible Management Strategies	Heritage Significance
IIIB	Such a resource might have similar significances to those of a Grade III A resource, but to a lesser degree.	Resource must be retained where possible where not possible it must be fully investigated and/or mitigated.	Medium Significance
IIIC	Such a resource is of contributing significance.	Resource must be satisfactorily studied before impact. If the recording already done (such as in an HIA or permit application) is not sufficient, further recording or even mitigation may be required.	Low Significance
NCW	A resource that, after appropriate investigation, has been determined to not have enough heritage significance to be retained as part of the National Estate.	No further actions under the NHRA are required. This must be motivated by the applicant or the consultant and approved by the authority.	No research potential or other cultural significance

Table 5: Rating system for built environment resources

Grading	Description of Resource	Examples of Possible Management Strategies	Heritage Significance
I	Heritage resources with qualities so exceptional that they are of special national significance. Current examples: Robben Island	May be declared as a National Heritage Site managed by SAHRA.	Highest Significance
II	Heritage resources with special qualities which make them significant in the context of a province or region, but do not fulfil the criteria for Grade I status. Current examples: St George's Cathedral, Community House	May be declared as a Provincial Heritage Site managed by Provincial Heritage Authority.	Exceptionally High Significance
II	Such a resource contributes to the environmental quality or cultural significance of a larger area and fulfils one of the criteria set out in section 3(3) of the Act but that does not fulfil the criteria for Grade II status. Grade III sites may be formally protected by placement on the Heritage Register.		

Grading	Description of Resource Examples of Possible Management Strategies		Heritage Significance
IIIA	Such a resource must be an excellent example of its kind or must be sufficiently rare. These are heritage resources which are significant in the context of an area.	This grading is applied to buildings and sites that have sufficient intrinsic significance to be regarded as local heritage resources; and are significant enough to warrant that any alteration, both internal and external, is regulated. Such buildings and sites may be representative, being excellent examples of their kind, or may be rare. In either case, they should receive maximum protection at local level.	High Significance
IIIB	Such a resource might have similar significances to those of a Grade III A resource, but to a lesser degree. These are heritage resources which are significant in the context of a townscape, neighbourhood, settlement or community.	Like Grade IIIA buildings and sites, such buildings and sites may be representative, being excellent examples of their kind, or may be rare, but less so than Grade IIIA examples. They would receive less stringent protection than Grade IIIA buildings and sites at local level.	Medium Significance
IIIC	Such a resource is of contributing significance to the environs These are heritage resources which are significant in the context of a streetscape or direct neighbourhood.	This grading is applied to buildings and/or sites whose significance is contextual, i.e., in large part due to its contribution to the character or significance of the environs. These buildings and sites should, as a consequence, only be regulated if the significance of the environs is sufficient to warrant protective measures, regardless of whether the site falls within a Conservation or Heritage Area. Internal alterations should not necessarily be regulated.	Low Significance

Grading	Description of Resource	Examples of Possible Management Strategies	Heritage Significance
NCW	A resource that, after appropriate investigation, has been determined to not have enough heritage significance to be retained as part of the National Estate.	No further actions under the NHRA are required. This must be motivated by the applicant and approved by the authority. Section 34 can even be lifted by the PHRA for structures in this category if they are older than 60 years.	Not Conservation worthy – no research potential or other cultural significance

Table 6: Site significance classification standards as prescribed by SAHRA.

FIELD RATING	GRADE	SIGNIFICANCE	RECOMMENDED MITIGATION
National Significance (NS)	Grade 1	Very High - of National Significance	Conservation; National Site nomination
Provincial Significance (PS)	Grade 2	Very High – of Provincial Significance	Conservation; Provincial Site nomination
Local Significance (LS)	Grade 3A	High Significance	Conservation; Mitigation not advised
Local Significance (LS)	Grade 3B	High Significance	Mitigation (Part of site should be retained)
Generally Protected A (GP.A)		High / Medium Significance	Mitigation before destruction
Generally Protected B (GP.B)		Medium Significance	Recording before destruction
Generally Protected C (GP.C)		Low Significance	Destruction

8 IDENTIFICATION OF IMPACTS

8.1 Impacts and Mitigation Framework

All impacts are analysed in the section to follow regarding their nature, extent, magnitude, duration, probability and significance.

ISO 14001-2004 defines impacts as "any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects".

When considering an assessment of the impacts and their mitigation, the following definitions as per Table 7 apply.

Table 7: Impact and Mitigation Quantification Framework

Nature	The project could have a positive, negative or neutral impact on the environment.
Nature	
Extent	Local – extend to the site and its immediate surroundings. Regional – impact on the region but within the province. National – impact on an interprovincial scale. International – impact outside of South Africa.
Magnitude	Degree to which impact may cause irreplaceable loss of resources: Low — natural and socio-economic functions and processes are not affected or minimally affected. Medium — affected environment is notably altered; natural and socio-economic functions and processes continue albeit in a modified way. High — natural or socio-economic functions or processes could be substantially affected or altered to the extent that they could temporarily or permanently cease.
Duration	Short term – 0-5 years. Medium term – 5-11 years. Long term – impact ceases after the operational life cycle of the activity either because of natural processes or by human intervention. Permanent – mitigation either by natural process or by human intervention will not occur in such a way or in such a time span that the impact can be considered transient.
Probability	Almost certain – the event is expected to occur in most circumstances. Likely – the event will probably occur in most circumstances. Moderate – the event should occur at some time. Unlikely – the event could occur at some time. Rare/Remote – the event may occur only in exceptional circumstances.
Significance	Provides an overall impression of an impact's importance, and the degree to which it can be mitigated. The range for significance ratings is as follows- 0 – Impact will not affect the environment. No mitigation necessary. 1 – No impact after mitigation. 2 – Residual impact after mitigation. 3 – Impact cannot be mitigated.
Mitigation	Information on the impacts together with literature from socio-economic science journals, case studies and field work will be used to provide mitigation recommendations to ensure that any negative impacts are decreased, and positive benefits are enhanced.
Monitoring	Monitoring usually involves developing and implementing a monitoring programme to identify deviations from the proposed action and to manage any negative impacts. The recommended mitigation measures will also include monitoring measures.

Table 8: Impact Methodology Table

Nature											
Negative			Neutral			Positive					
-1			0			+1					
Extent											
Local	l Regional			National				International			
1		2			3				4		
Magnitude											
Low			Mediur	dium High							
1			2 3			3					
Duration											
Short Term (0-5yrs) Medium Term (5-1			erm (5-11	Lyrs)	Long Term			Permanent			
1	2			3			4				
Probability											
Rare/Remote	Remote Unlikely			Moderate		Like	Likely		Almost Certain		
1	2			3	4		4			5	
Significance											
No Impact/None No In Mitigation		npact [/] Low	After Residual Impa Mitigation/Medi				Impact Cannot be Mitigated/High		be		
0 1				2		3					

8.2 <u>Identification of Activities and Aspects</u>

An "Activity" is defined as a distinct process or risks undertaken by an organisation for which a responsibility can be assigned. Activities also include facilities or pieces of infrastructure that are possessed by an organisation (International Organization for Standardization, 2011).

An aspect is defined as elements of an organisation's activities, products, or services that can interact with the environment.

In order to capture the impacts associated with the proposed infrastructure, an activity – aspect – impact table was created, refer to Table 9 below.

Table 9: Activity, Aspects and Impacts of the Project

Activity	Aspect	Potential Impact – Positive	Potential Impact – Negative		
Site clearance/construction camp	Heritage		Damage to existing historical structures and/or graves		
Construction	Heritage	Positive - if historical structures are reused	Damage to existing historical structures and/or graves		
Operation	Heritage	Positive – if historical structures are reused	Damage to existing historical structures and/or graves		

8.3 Impact and Mitigation Assessment

The project area that will be impacted by the proposed Oslaagte Solar 2 PV project contains some areas that are currently disturbed by grazing activities and other animal activity (e.g., burrows and termite mounds).

The impact significance of the project on graves and cemeteries is high before mitigation as the graveyard site (Os2-04) and site with potential infant burials (Os2-02) are both located inside the proposed PV array area of the project footprint (for both Alternative 1 and Alternative 2). Site Os2-04 is protected by section 36 of the NHRA and must be avoided in the design planning. There is also a possibility that potential infant burials could be located at Site Os2-02. However, implementation of the mitigation measures required (set out in **Table 10**, below) will reduce the impact to low.

The impact significance of the proposed project on protected historical structures is low as only one potential historical structures site was identified (Os2-02) which contained the collapsed remains of several structures of a homestead.

8.4 Impacts During the Planning, Construction and Operation Phase

As a result of the analysis above, **Error! Reference source not found.** the following impact/mitigation table has been generated.

Table 10: Heritage Resources – Historical Graves Mitigation Table

Environmental Feature	Haritage recourses. Craves and hurial grounds						
Environmental Feature	Heritage resources – Graves and burial grounds						
Project life cycle	Planning, Construction and Operation						
Potential Impact	Proposed Management Objectives / Mitigation Measures						
Possible damage to or destruction of identified historical graves (Os2-04)	 A buffer of at least 30m must be placed around the graveyard at Os2-04 to ensure that during construction, the graves are not damaged The materials demarcating the 30m buffer must be highly visible and made of durable material to ensure that they are still in place during the operation of the PV site so that work crews are aware of the site. If, for any reason, the graves cannot be avoided, then a Phase 2 mitigation process will need to be undertaken. During this process, the family and relevant communities will have to be engaged with regarding their wishes on the possibility of relocating the graves (permission and to discuss where the remains are to be moved to). In addition, application will have to be made to SAHRA for the necessary permits. Sub-sections (4) and (5) of section 36 of the NHRA regarding the removal of graves must be adhered to. The exhumation and removal of graves is strongly discouraged as graves are highly significant to many people and there are many traditional, cultural and personal sensitivities concerning the removal of graves. 						
Potential infant burials (Site Os2-02) and unidentified	A buffer of at least 30m must be placed around the site Os2-02 to ensure						
graves	that during construction, the site is not damaged						

 If any impact is anticipated to this site, then social consultation with the local community is required to confirm the presence or absence infant burials If infant burials are confirmed then a Phase 2 mitigation process for grave removal will be required, as above If any significant changes are made to the general project footprint pri to construction, monitoring of site clearance activities must lundertaken by a heritage specialist to identify any addition unidentified grave sites or burials 							
Alternative 1	Nature	Extent	Magnitude	Duration	Probability	Significance	
Before Mitigation	Negative	Local	High	Permanent	Almost Certain	3	
After Mitigation	Negative	Local	Medium	Long- term	Unlikely	1	
Significance of Impact and Preferred Alternatives	The graveyard site (Os2-04) and site with potential infant burials (Os2-02) are both located inside the proposed PV array area of the project footprint (Alternative 1), therefore, the above mitigation measures must be followed for both sites. It is recommended that specifically site Os2-04 be avoided and demarcated as a "no go" area.						
Alternative 2	Nature	Extent	Magnitude	Duration	Probability	Significance	
Before Mitigation	Negative	Local	High	Permanent	Moderate	2	
After Mitigation	Negative	Local	Medium	Long- term	Unlikely	1	
Significance of Impact and Preferred Alternatives	The graveyard site (Os2-04) and site with potential infant burials (Os2-02) are both avoided by the Alternative 2 layout. However, there is still a possibility of indirect impact. It is recommended that specifically site Os2-04 be avoided and demarcated as a "no go" area.						

Table 11: Heritage Resources – Historical Structures Mitigation Table

Environmental Feature	Heritage resources – Historical structures (Os2-02)				
Project life cycle	Planning, Construction and Operation				
Potential Impact	Proposed Management Objectives / Mitigation Measures				
Possible damage to or destruction of extant historical structures	Not applicable, none identified.				
Possible destruction of demolished remains of historical structures (Site Os2-02)	 A buffer of at least 30m must be placed around this site to ensure that during construction, no historical-archaeological material is damaged The materials demarcating the 30 m buffer must be highly visible and made of durable material to ensure that they are still in place during the construction of the PV site so that work crews are aware of the site. If any destruction/clearance of the area is anticipated, a permit will be required from FS PHRA or SAHRA NB: the above will apply in addition to the mitigation measures set out in the table above for the potential infant graves 				

Alternative 1	Nature	Extent	Magnitude	Duration	Probability	Significance		
Before Mitigation	Negative	Local	Medium	Permanent	Almost certain	2		
After Mitigation	Positive	Local	Low	Short-term	Unlikely	1		
Significance of Impact and Preferred Alternatives	Site Os2-02 has low significance as the buildings are all demolished. However, the potential for infant graves increases the significance to medium-high without mitigation. This site is located within the Alternative 1 layout and should be avoided with a 30m buffer.							
Alternative 2	Nature	Extent	Magnitude	Duration	Probability	Significance		
Before Mitigation	Negative	Local	Medium	Permanent	Moderate	2		
After Mitigation	Positive	Local	Low	Short-term	Unlikely	1		
Significance of Impact and Preferred Alternatives	Site Os2-02 has low significance as the buildings are all demolished. However, the potential for infant graves increases the significance to medium-high without mitigation. This site is avoided by the Alternative 2 layout.							

8.5 Cumulative impacts

The project area and surrounding region has been affected by impacts of activities occurring in the past, current activities and proposed future developments. These will be discussed below.

Past impacts: The past HIA reports recovered from the SAHRIS database indicated that the Oslaagte Solar 2 PV project footprint and surrounding region has been affected by several development and other activities that would have disturbed the heritage resources which occur in the area. These include other solar PV projects, prospecting and mining projects, pipeline and fibre optic cable construction and the construction of the N1 national road and R76 regional road, in addition to historical farming activities around Kroonstad and the development of Kroonstad town.

Current impacts: the immediate area of the Oslaagte Solar 2 PV footprint is affected by farming activities (cattle and game) and the R76 regional road is currently being upgraded with roadworks in progress along the eastern boundary of the project area.

The baseline impacts are considered to be moderate for Heritage resources, and additional project impacts (if no mitigation measures are implemented) will increase the significance of the existing baseline impacts, where the cumulative unmitigated impact will probably be of a moderate to high significance. The impact is going to happen and will be long-term in nature, therefore the impact risk class will be Moderate to High. However, with the implementation of the recommended management and mitigation measures this risk class can be minimized to a Low rating.

9 ANALYSIS OF ALTERNATIVES

9.1 Introduction

Alternatives are the different ways in which the Project can be executed to ultimately achieve its objectives. Examples could include carrying out a different type of action, choosing an alternative location or adopting a different technology or design for a project.

9.2 <u>Site Alternatives</u>

No site alternatives are proposed for this Project. Favourable location factors for the PV Site include suitable solar irradiation levels, short distance to grid connection point, flat topography, suitable site access and availability of land.

9.3 Layout / Design Alternatives

The project applicant adopted a comprehensive iterative design process to inform the Oslaagte Solar 2 PV layout/design. By integrating the screening and assessment of environmental (including heritage) and social constraints alongside the technical components of the project, allowed for the reduction in risks to the project.

In terms of the impact on the identified heritage resources, the original layout (Alternative 1) has been revised to exclude certain environmentally and heritage sensitive areas (Alternative 2). The Alternative 2 layout avoids the graveyard site (Os2-04) and also avoids the homestead structure remains site (Os2-02) with potential infant graves. Therefore, from a heritage perspective, Alternative 2 is the preferred layout. However, these two heritage resources could be subject to indirect impact, specifically during site clearance or construction activities, therefore the mitigation measures set out above and below will still apply.

9.4 No-Go Option

As standard practice and to satisfy regulatory requirements, the option of not proceeding with the Project is included in the evaluation of the alternatives.

The no-go alternative can be regarded as the baseline scenario against which the impacts of the Project are evaluated. This implies that the current status and conditions associated with the proposed Project footprint will be used as the benchmark against which to assess the possible changes (impacts) associated with the Project.

In contrast, should the proposed Project not go ahead, any potentially significant environmental issues would be irrelevant, and the status quo of the local receiving environment would not be affected by the project-related activities. The objectives of the Project, including the benefits (such as the

exploitation of SA's renewable energy resources, potential economic development and related job creation, and increased security of electricity supply), will not materialise.

10 STATEMENT OF IMPACT SIGNIFICANCE

The project area that will be impacted by the proposed Oslaagte Solar 2 PV project contains some areas that are currently disturbed by cattle and game farming activities and other animal activity (e.g., burrows and termite mounds).

The impact significance of the project on graves and cemeteries is high before mitigation as the graveyard site (Os2-04) and site with potential infant burials (Os2-02) are both located inside the proposed PV panel area of the project footprint (both Alternative 1 and Alternative 2 layouts). Site Os2-04 is protected by section 36 of the NHRA and must be avoided in the design planning. There is also a possibility that potential infant burials could be located at Site Os2-02. However, implementation of the mitigation measures required (set out in **Table 10**, above) will reduce the impact to low.

The impact significance of the proposed project on protected historical structures is low before mitigation as only one potential historical structure site was identified (Os2-02) which contained the collapsed remains of several structures of a homestead.

11 HERITAGE MANAGEMENT GUIDELINES

11.1 General Management Guidelines

The following General Heritage Management Guidelines are recommended:

- 1. It is advisable that an information section on cultural resources be included in the SHEQ training given to contractors involved in surface earthmoving activities. These sections must include basic information on:
 - a. Heritage;
 - b. Graves;
 - c. Archaeological finds; and
 - d. Historical Structures.
- 2. This module must be tailor made to include all possible finds that could be expected in that area of construction. Possible finds include:
 - a. Unidentified graves or burials;

- b. Historical-archaeological material, including middens;
- c. Historical structure remains;
- d. Palaeontological deposits such as bones and teeth or plant fossils.
- 3. If a possible find is discovered during construction, all activities must be halted around the discovery and a qualified archaeologist contacted.
- 4. The archaeologist needs to evaluate the finds on site and make recommendations towards possible mitigation measures.
- 5. If mitigation is necessary, an application for a rescue permit must be lodged with SAHRA.
- 6. After mitigation, an application must be lodged with SAHRA for a destruction permit. This application must be supported by the mitigation report generated during the rescue excavation. Only after the permit is issued may such a site be destroyed.
- 7. If during the initial survey sites of cultural significance are discovered, it will be necessary to develop a management plan for the preservation, documentation or destruction of such a site. Such a program must include an archaeological/palaeontological monitoring programme, timeframe and agreed upon schedule of actions between the company and the archaeologist.
- 8. If human remains are uncovered, or previously unknown graves are discovered, a qualified archaeologist needs to be contacted and an evaluation made of the finds.
- 9. If the remains or grave/s are to be exhumed and relocated, the relocation procedures as accepted by SAHRA need to be followed. This includes an extensive social consultation process.

12 RECOMMENDATIONS AND CONCLUSION

The proposed Oslaagte Solar 2 PV project (Alternative 1 and Alternative 2) could impact on heritage resources identified within and adjacent to the project footprint. Heritage resources that were verified by the field survey to occur within the project footprint include a total of four heritage resources situated within the project area footprint and one situated just north of the north-eastern boundary (within the Oslaagte Solar 1 PV footprint). Two of these sites are recent/modern structures (Os2-01 and Os2-03), one is the graveyard depicted on the 1960 topographic map (Os2-04) and one comprises several clusters of rocks likely to be the remains of an African homestead (Os2-02).

In terms of the impact on the identified heritage resources, the Alternative 2 layout which has been revised to exclude certain environmentally and heritage sensitive areas is the preferred alternative. However, the graveyard site (Os2-04) and homestead site with potential infant graves (Os2-02) could still be subject to indirect impact, specifically during site clearance or construction activities. Consequently, the mitigation measures set out above and below will still apply.

The recommendations below are provided to mitigate the potential impact of the grid connection on the identified heritage resources:

- The heritage sites Os2-02 and Os2-04 must be protected with at least a 30m buffer;
- The formal graves at Site Os2-04 are protected by section 36 of the NHRA and must be demarcated and avoided as a "no go" area. There is also a possibility that potential infant burials could be located at Site Os2-02. This site should also be demarcated and avoided as a "no go" area.;
- The remains of Historical structures at Os2-02 are protected by section 34 of the NHRA and should be fenced and avoided as "no go" areas to prevent any indirect impact;
- A separate desktop palaeontological assessment is being undertaken by a palaeontologist as
 the project area falls into an area of Very High fossil sensitivity. The desktop assessment will
 indicate if significant/sensitive fossils will be impacted by the proposed project and provide
 mitigation measures and the way forward in this regard.

No fatal flaws were identified during this study, therefore, it is the considered opinion of the heritage specialist that the construction of the proposed Oslaagte Solar 2 PV project within the footprint can proceed. There are no objections from a heritage perspective provided the recommendations and mitigation measures contained in this report and in the palaeontological assessment are implemented before any site clearance or construction activities commences. In terms of the impact on the identified heritage resources, Alternative 2 is preferred as the layout has been revised to avoid the two sites containing historical graves and structure remains (Os2-04 and Os2-02).

13 REFERENCES

- Angel, J and J Kitto. 2018. Kophia Diamonds (Pty) Ltd Catherine's Fancy 831, which forms part of the Blaauwbosch Mine, Boshof District, Free State Province Heritage Impact Assessment.
- Bergh, J.S 1999. Geskiedenisatlas van Suid-Afrika: die Vier Noordelike Provinsies. Van Schaik, Pretoria.
- De Bruyn, C. 2018. Basic Assessment Report for the Prospecting Right and Environmental Authorisation Application for Kroonstad South Situated in the Free State Province.
- De Jong, RC. 2011. Specialist Study: Heritage Impact Assessment for the Installation of the Sirius Fibre
 Optic Cable between Johannesburg and Yzerfontein, Gauteng, Free State, Eastern and Western
 Cape Provinces
- De Ruiter, DJ., SE Churchill, JK Brophy and LR Berger. 2011. *Regional Survey of Middle Stone Age Fossil Vertebrate Deposits in the Virginia-Theunissen area of the Free State, South Africa* in Navorsinge van die Nasionale Museum, vol. 27, part 1.
- Dreyer, JJB. 1990. *The Iron Age Prehistory of the Winburg Area, Orange Free State*. Unpublished MA Dissertation, University of the Witwatersrand.
- Erasmus, BPJ. 2014. On Route in South Africa. Third edition. Jonathan Ball Publishers: Johannesburg

- Fourie, W. 2021. HIA for *The Proposed Harmony FSS6 Reclamation Pipeline, Welkom, Free State Province.*
- Huffman, T.N. 2007. Handbook to the Iron Age. University of KwaZulu-Natal Press, Scottsville.
- Maggs, TMO'C. 1976. Iron Age Communities of the Southern Highveld. Natal Museum
- Notice No. 380. 2019. South African Heritage Resources Agency Declaration of the Grave of Reverend Zaccheus Richard Mahabane; Maokeng; Free State as a National Heritage Site in *Government Gazette Republic of South Africa Vol. 645 15 March 2019 No. 42304*
- Lavin, J. 2020. Archaeological Specialist Study In terms of Section 38(8) of the NHRA for a Proposed development of the Vrede and Rondavel Solar Energy Facilities near Kroonstad, Free State Province
- Oberholster, J.J. 1972. *The Historical Monuments of South Africa*. The Rembrandt van Rijn Foundation for Culture, Cape Town. Cited in Fourie 2021.
- Ouzman, S. 2001. *Spitskop rock-engraving site complex*. National Museum Rock Art Department internal publication.
- Raper, PE. 2014. Dictionary of Southern African Place Names. Jonathan Ball Publishers
- Schoeman, K. *Bloemfontein: die ontstaan van 'n stad 1846 1946*. Human & Rousseau, Cape Town. Cited in Fourie 2021.
- Van der Walt, J. 2019. Heritage Desktop Report Lengana Health SA Prospecting Application, Koppies, Free State Province.
- Wadley, L. 2013. Recognizing complex cognition through innovative technology in Stone Age and Palaeolithic sites in Cambridge Archaeological Journal, 23: 163-183. doi:10.1017/S0959774313000309
- Verwey EJ (Ed). 1995. New Dictionary Of South African Biography Volume 1

Afrikaans community 1820-1899 | South African History Online (sahistory.org.za)

Battlefields Route - Koppies to Kroonstad | The Heritage Portal

British Concentration Camps of the South African War 1900-1902 (uct.ac.za)

https://www.gov.za/kroonstad-correctional-centre-officially-renamed-bizzah-makhate-correctional-centre

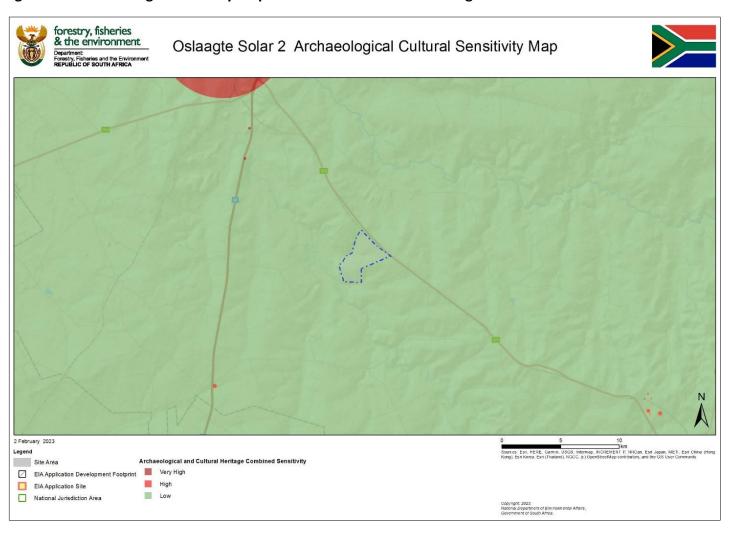
de Klerk SJ. 2021. Battlefields Route - Koppies to Kroonstad | The Heritage Portal

The-Boer-Rebellion-in-South-Africa-pdf.pdf (moltenofamily.net)

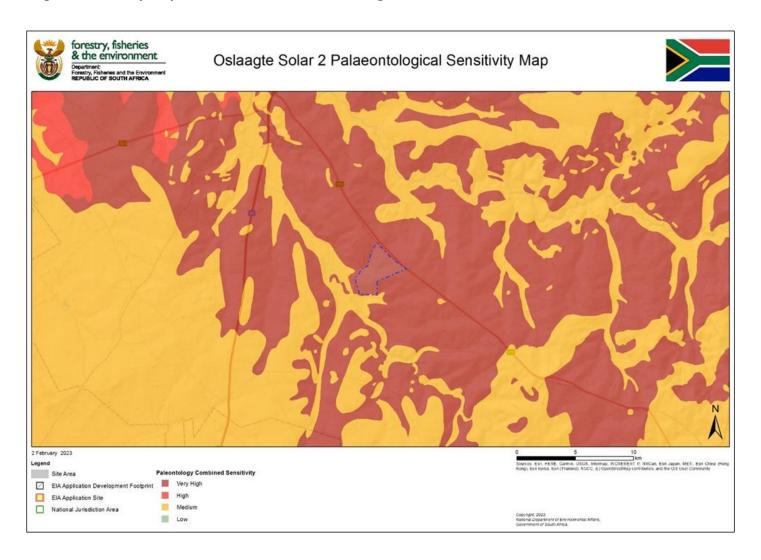
Kroonstad | South African History Online (sahistory.org.za)

APPENDIX 1: HERITAGE SENSITIVITY MAP/S

1. Archaeological Cultural Heritage Sensitivity map from Environmental Screening Tool



2. Palaeontological Sensitivity map from Environmental Screening Tool



3. Heritage Sensitivity Maps based on the Site Inspection / Field survey .

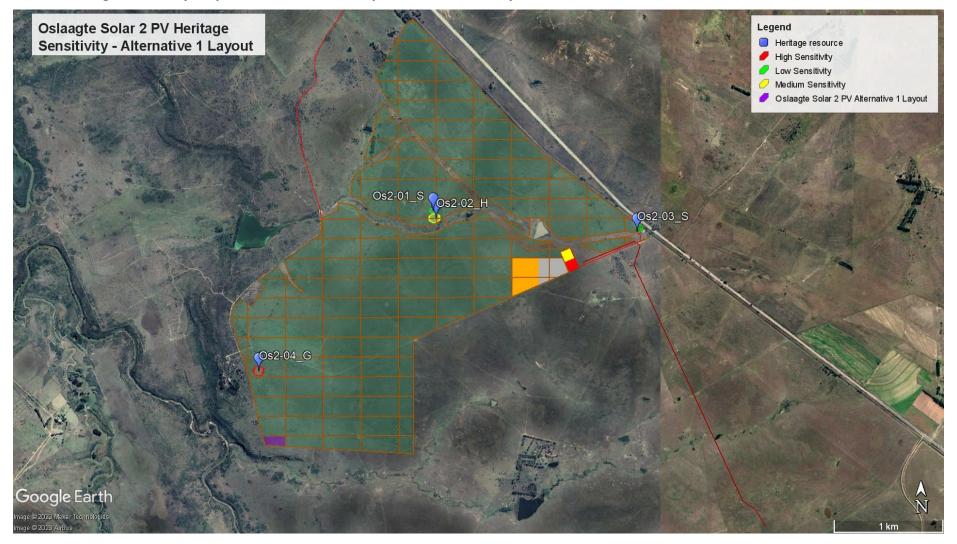


Figure 28: Heritage Sensitivity for Oslaagte Solar 2 PV – Layout Alternative 1

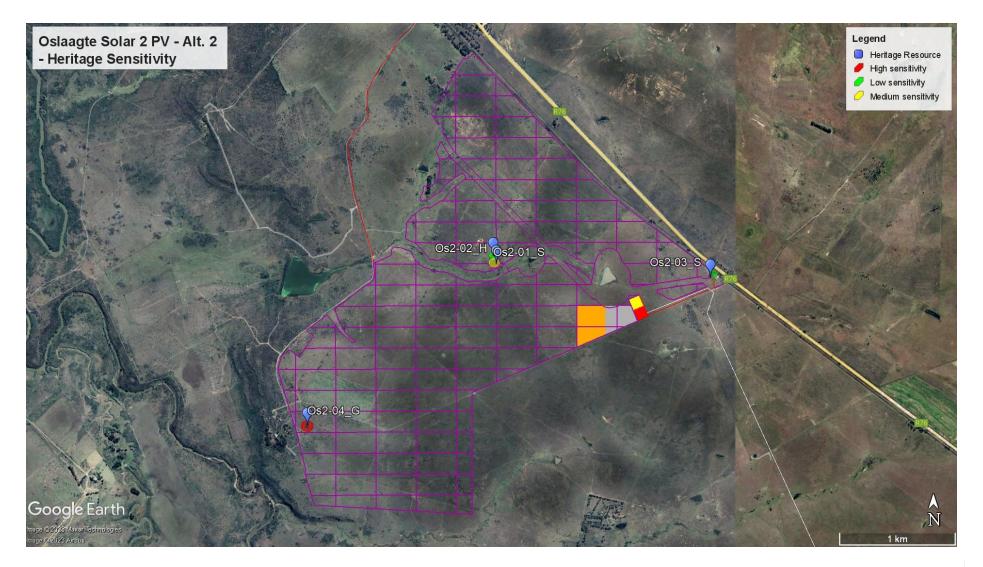


Figure 29: Heritage Sensitivity for Oslaagte Solar 2 PV – Layout Alternative 2

APPENDIX 2: CURRICULUM VITAE OF HERITAGE SPECIALIST

1 Personal Particulars

Profession: Heritage Specialist

Date of Birth: 11 September 1966

Name of Firm: Nitai Consulting

Name of Staff: Jennifer Kitto

Nationality: RSA

Membership of Professional Societies Association of Southern African Professional

Archaeologists (444); International Association

for Impact Assessment South Africa (7151)

2 **Education**:

BA Hons Social Anthropology, WITS, South Africa, 1994

BA. Archaeology and Social Anthropology, WITS, South Africa, 1993

Higher National Diploma, Practical Archaeology, Dorset Institute for Higher Education (now Bournemouth University), UK, 1989

3 <u>Employment Record:</u>

2022 - Present Heritage Specialist, Nitai Consulting

Conduct Heritage Impact Assessments;

2012 – 2021 Heritage Specialist, PGS Heritage (Pty) Ltd

Conduct Heritage Impact Assessments

Compile Desktop Historical Research

Compile Heritage Audit and Management Plans

Compile and submit permit applications to National and Provincial Heritage Authorities for Section 34

building alterations and demolitions (under National Heritage Resources Act, 25 of 1999)

Compile and submit permit applications to Provincial and Municipal Health Authorities for Section 36

relocations of graves and burial grounds (under National Heritage Resources Act, 25 of 1999 and

National Health Act, No 61 of 2003)

2008 – 2011 Cultural Heritage Officer (National), Burial Grounds and Graves Unit: South African Heritage Resources Agency (SAHRA)

Review and assessing permit applications for relocation of historical graves and burial grounds

1998 – 2008 Cultural Heritage Officer (Provincial), Provincial Office – Gauteng: SAHRA

Review and comment on heritage and archaeological impact reports

Research for the nomination and grading process for related to the declaration of specific heritage resources as National Heritage Sites

Monitoring of certain archaeological and built environment National Heritage Sites (e.g. The Cradle of Humankind World Heritage Site)

4 <u>Selected Consultancies</u>

4.1 GDID East Corridor, OHS Implementation, Tambo Memorial Regional Hospital (as subcontractor to PGS Heritage (Pty) Ltd

2022 Independent Heritage Specialist. Compile Historical Archival Report of Tambo Hospital Boksburg, Gauteng for PGS Heritage (Pty) Ltd, Finalise HIA Report and submit HIA report to Gauteng Provincial Heritage Resources Authority

4.2 GDID East Corridor, OHS Implementation, Tembisa Regional Hospital (as sub-contractor to PGS Heritage (Pty) Ltd

2022 Independent Heritage Specialist. Compile Historical Archival Report of Tembisa Hospital, Ekurhuleni, Gauteng for PGS Heritage (Pty) Ltd, Finalise HIA Report and submit HIA report to Gauteng Provincial Heritage Resources Authority.

4.3 Kroonstad Cluster Solar PV Facilities

2022/2023 Heritage Specialist, Development of three Solar PV facilities west of Kroonstad, Free State Province, South Africa, Undertake Heritage Impact Assessment of all heritage resources associated with the three solar PV facilities

4.4 Rustenburg Solar PV Facilities

2022/2023 Heritage Specialist, Development of three Solar PV facilities near Raisimone, Rustenburg, North West Province, South Africa, Undertake Heritage Impact Assessment of all heritage resources associated with the three solar PV facilities

4.5 Seelo Solar PV Cluster

2022/2023 Heritage Specialist, Development of three Solar PV facilities near Carletonville, North West Province, South Africa, Undertake Heritage Impact Assessment all heritage resources associated with the three solar PV facilities

4.6 Decommissioning of Komati Power Station

2023, Heritage Specialist, Proposed Decommissioning of the Komati Power Station, Middelburg, Mpumalanga, Undertake Heritage Impact Assessment of all heritage structures within the power station

4.7 Carbon Capture Utilisation & Storage Pilot Project

2023 Heritage Specialist, Proposed pilot project for the capture and storage of CO₂, in Mpumalanga, comprising a 3D seismic survey and test drilling for the purpose of geological characterisation of the project area. Undertake Heritage Impact Assessment all heritage resources associated with the CCUS Pilot Project.

5 <u>Languages:</u>

English - excellent speaking, reading, and writing Afrikaans –fair speaking, reading and writing