

APPENDIX C6:  
Comments Received

# **ENVIRONMENTAL IMPACT ASSESSMENT PHASE**

**Our Ref:**



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Sityhilelo Ngcatsha  
Tel: 0212028663  
Email: [sngcatsha@sahra.org.za](mailto:sngcatsha@sahra.org.za)  
CaseID: 17866

Date: Tuesday February 15, 2022  
Page No: 1

## **Interim Comment**

**In terms of Section 38(8), 38(3) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Savannah Environmental (Pty) Ltd

PO Box 148  
Sunninghill  
2157

**ENGIE Sannaspos Solar Project (Pty) Ltd received authorisation for the proposed Sannaspos PV Plant Phase 1 (75MW) and associated infrastructure, located on portion 0 of Farm 1808 Besemkop and Portion 0 of Farm 2962 Lejwe, within the Mangaung Metropolitan Municipality, Free State Province in June 2013. The EIA considered includes an area of 150ha for the PV arrays. The applicant is proposing to expand this area by 50ha within which project infrastructure will be placed.**

Engie Sannaspos Solar Project (Pty) Ltd appointed Savannah Environmental (Pty) Ltd to undertake an Environmental Authorisation (EA) Application for the proposed expansion of the Sannaspos PV Plant Project on Portion 0 of Farm 1808 Besemkop and Portion 0 of Farm 2962 Lejwe, about 30 east south-east of Bloemfontein, Mangaung Local Municipality, Free State Province (DFFE Ref No.: 14/12/16/3/3/2/360)..

A Scoping Report was submitted in terms of the National Environmental Management Act (NEMA; Act No. 107 of 1998) and the 2014 NEMA EIA Regulations as amended. The development area is 150ha in extent and an additional 50ha is required. The 50ha is located within the properties assessed for the project for the installation of bifacial PV modules.

This development application is related to case ID 424 ([589558 | SAHRA](#)) on which a final comment was issued on the 24/11/2021 which noted the Heritage Impact Assessment (HIA), Palaeontological Impact Assessment (PIA) and the Heritage Conservation Management Plan (HCMP) along with the recommendations and the management procedures provided therein.

CTS Heritage was appointed to provide heritage specialist input as part of the EA process as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Bamford, M. 2021. Palaeontological Impact Assessment for the proposed Sannaspos Photo voltaic Facility, Farms Lejwe and Besemkop, Free State Province.*

# Additional development area for the authorised Engie Sannaspos PV Facility is the Mangaung Metropolitan Municipality, Free State Province

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The proposed development area is underlain the Adelaide Subgroup of the Beaufort Group and the unfossiliferous Jurassic Dolerite that has zero palaeontological sensitivity and overlain by the Quaternary sands which are unlikely to preserve any fossils. Fossils that could occur in the Adelaide Subgroup are fish, amphibians, reptiles, therapsids, terrestrial and freshwater tetrapods, as well as freshwater bivalves, trace fossils including tetrapod trackways and burrows. Vascular plants of the late Glossopteris Flora and insects are also prevalent are also known to exist in the Adelaide Subgroup.

There are no previously recorded fossils from the area there is a small chance that fossils may occur in the Adelaide Subgroup, therefore, the attached Fossil Chance Find Protocol should be added to the EMP. If fossils are found once excavations for foundations and amenities has commenced then their locations should be recorded (GPS), photographed, and a palaeontologist called to assess and collect a representative sample.

*Lavin, J. 2021. Heritage Screener: Additional development area for the authorised Engie Sannaspos PV Facility is the Mangaung Metropolitan Municipality, Free State Province*

Fossils have been identified in the development footprint and it is not likely that the proposed expansion to the PV facilities will negatively impact on significant resources on condition that the protocols outlined in the HIA and the Heritage Management Plan are followed. No further assessment of impacts to heritage resources is recommended.

## Interim Comment

A heritage field survey of the expansion footprint must be undertaken and the report of the survey must be submitted during the draft Environmental Impact Assessment (EIA) phase before further comments can be made.

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

Yours faithfully

**Additional development area for the authorised Engie Sannaspos PV Facility is  
the Mangaung Metropolitan Municipality, Free State Province**

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

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

**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/592042>

## Nondumiso Bulunga

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**From:** Savannah Public Process  
**Sent:** Wednesday, 22 June 2022 13:07  
**To:** 'Lehlohonolo Lenkoe'  
**Cc:** Tamryn Lee Goddard  
**Subject:** RE: meeting

Good day,

Thank you for the email.

Would you be able to join a virtual meeting perhaps on MSN teams or ZOOM or WhatsApp Call on Wednesday 30<sup>th</sup> June 2022?

Anytime that suits you we will avail ourselves.

Please advise.

Kind regards,



t: +27 (0)11 656 3237  
f: +27 (0) 86 684 0547

**Nondumiso Bulunga**

Lead Consultant: Social, Stakeholder  
Engagement & GIS

e: [nondumiso@savannahsa.com](mailto:nondumiso@savannahsa.com)

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

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**From:** Lehlohonolo Lenkoe <[lenkoelv@gmail.com](mailto:lenkoelv@gmail.com)>  
**Sent:** Tuesday, 21 June 2022 10:17  
**To:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Subject:** Re: meeting

Some people of aletta trust know nothing about that project that will take place in they're farm so it will make some difficulty when proses go through.so we just need to hear from your side what happening all of us thanks

On Mon, 20 Jun 2022, 11:14 Savannah Public Process, <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)> wrote:

Good day,

Thank you for your email.

Please could you kindly advise what you would like to know as part of the meeting agenda we would need to prepare.

We are running the environmental impact assessment for the project and would like to know if the meeting request is to receive environmental related information?

Thank you .

Kind regards,



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**Nondumiso Bulunga**  
Lead Consultant:Social, Stakeholder  
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SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

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**From:** Lehlohonolo Lenkoe <[lenkoelv@gmail.com](mailto:lenkoelv@gmail.com)>  
**Sent:** Friday, 17 June 2022 12:16  
**To:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Subject:**

# **SCOPING PHASE**





# forestry, fisheries & the environment

Department:  
Forestry, Fisheries and the Environment  
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA 0001· Environment House 473 Steve Biko Road, Arcadia,· PRETORIA

**DFFE Reference:** 14/12/16/3/3/2/2126

**Enquiries:** Ms Julliet Mahlangu

**Telephone:** (012) 399 9320 **E-mail:** [jmmahlangu@environment.gov.za](mailto:jmmahlangu@environment.gov.za)

Ms Jo-Anne Thomas  
Savannah Environmental (Pty) Ltd  
P.O. Box 148  
**SUNNINGHILL**  
2157

**Telephone Number:** 011 656 3237  
**Email Address:** [joanne@savannahsa.com](mailto:joanne@savannahsa.com)

## PER MAIL / E-MAIL

Dear Ms Thomas

### **COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED ADDITIONAL DEVELOPMENT AREA FOR THE AUTHORISED ENGIE SANNASPOS PV FACILITY, IN THE MANGUANG DISTRICT MUNICIPALITY IN THE FREE STATE PROVINCE**

The Application for Environmental Authorisation and Draft Scoping Report (SR) dated February 2022 and received by the Department on 10 February 2022, refer.

This letter serves to inform you that the following information must be included to the Final Scoping Report:

#### **(a) Listed Activities**

- Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description.
- If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.environment.gov.za/documents/forms>.

#### **(b) Public Participation Process**

- Please ensure that all issues raised and comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the Final SR. Proof of correspondence with the various stakeholders must be included in the Final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.
- A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document

from the main report. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as “Noted” is not regarded as an adequate response to I&AP’s comments.

- The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development; particularly the South African Astronomical Observatory, the Free State Environmental Department, the District and Local Municipalities.

### **(c) Specialist Assessments**

- Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of turbine positions, and all other associated infrastructures that they have assessed and are recommending for authorisations.
- The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.
- Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.
- It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. “the Protocols”), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. **Please note that specialist assessments must be conducted in accordance with these protocols.**

### **(d) Cumulative Assessment**

- Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:
  - Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.
  - Detailed process flow and proof must be provided, to indicate how the specialist’s recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
  - The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
  - A cumulative impact environmental statement on whether the proposed development must proceed.

### **General**

You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:

*“If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority”*

You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.

Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely



**Mr Sabelo Malaza**  
**Chief Director: Integrated Environmental Authorisations**  
**Department of Forestry, Fisheries and the Environment**  
**Letter signed by: Dr Danie Smit**  
**Designation: Deputy Director: National Infrastructure Projects**  
**Date: 03/03/2022**

cc:	Reginald Niemand	ENGIE Sannaspos (Pty) Ltd.	E-mail: <a href="mailto:reggie.niemand@engie.com">reggie.niemand@engie.com</a>
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