



an agency of the
Department of Arts and Culture

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CaseID: 424

Date: Wednesday November 24, 2021
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Final Comment

In terms of Section 38 of the National Heritage Resources Act (Act 25 of 1999)

Attention: Sannaspos Solar PV (Pty) Ltd

P. O Box 4778
Rivonia
Johannesburg
Gauteng
2128

Phase 1 of the Proposed Sannaspos Photovoltaic Solar Energy Facility, Free State DEA Ref: 14/12/16/3/3/2/360

Engie Solar Africa (Pty) Ltd [previously known as Solaire Direct Southern Africa (Pty) Ltd] was granted an Environmental Authorisation (EA) for the Sannaspos PV Solar Energy Facility on portion 0 of the farm 1808 Besemkop and portion 0 of the farm 2962 Lejwe, Mangaung Metropolitan Municipality, Free State Province on the 26/06/2013 (Ref: 14/12/16/3/3/2/360).

SAHRA provided a Letter on the 17/08/2012, requesting that a Heritage Impact Assessment (HIA) be conducted (<https://sahris.sahra.org.za/node/49888>). An HIA and Palaeontological Impact Assessment (PIA) were submitted to the application on the 11/03/2013 along with the Final Environmental Impact Assessment report. No further comments were provided by SAHRA. These heritage reports will be briefly summarized below.

Kibili, J. M. 2012. Palaeontological Impact Assessment: Desktop Study. Proposed Sannaspos Photovoltaic (PV) Solar Energy Facilities, Portion 0 of Farm 1808 Besemkop and Portion 0 of Farm 2962 Lejwe of Mangaung Metropolitan Municipality, Free State Province.

The development area is underlain by the Beaufort Group that consists of sandstone and shale that may contain fossils such as primitive reptiles, therapsids, amphibians, fish, molluscs and plant fossils.

Recommendations provided in the report included the following:

- That a qualified palaeontologist be commissioned to undertake ground reconnaissance of the



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designated area prior to groundbreaking;

- That construction manager(s) report any fossil finds encountered during construction to a qualified palaeontologist who will undertake necessary mitigation procedures in accordance with protocols of the South African Heritage Resources Agency (SAHRA).

Tomose, N. 2012. A Phase 1 Heritage impact assessment study for the proposed photovoltaic (PV) solar energy facilities (in Sannaspos), near Bloemfontein, Free State Province: DEA Ref No: 14/12/16/3/3/2/360 (Phase 1); DEA Ref No: 14/12/16/3/3/1/615 (Phase 2).

A total of four heritage sites were identified within the development area. These included one surface scatter of Middle Stone Age lithics of low heritage significance, one historical stone shed of high heritage significance, and two cemeteries of high significance. The graffiti is not considered to be a heritage resource.

Recommendations provided in the report include the following:

- It is proposed that the three sites should be preserved in situ and not be disturbed or altered during the Sannaspos Solar Farm construction activities;
- Should construction activities come closer to these sites, a buffer of approximately 20m should be retained between graves and construction activities – for example, for Sannas-5 and Sannas-1;
- It is recommended that the proposed project construction phase should pay special attention to possible encounter of archaeological resources and sites such as unmarked graves or stone and iron implements (dating to Iron Age and to events of the Second South African War as discussed above);
- Should such sites be discovered during the construction phase, construction activities need to be stopped with immediate effect and a professional archaeologist need to be called on site to inspect and investigate the finds and make recommendations on further actions that need to take place to rescue or mitigate the finds. For example, applying for rescue permits with SAHRA-BGG Unit in case of discovery of unmarked graves and SAHRA-APM Unit in case of archaeological and palaeontological remains;
- To achieve the above two recommendation – it is further recommended that an Environmental Control Officer should be inducted on heritage management before the commencement of construction activities and that he/she should be to take responsibility for heritage sites and resources during the construction phase of the project.

It is noted that the recommendations from the above specialist reports were included in the Environmental



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Management Programme (EMPr).

The EA has subsequently been amended to split the PV facility and the associated grid infrastructure into separate EA's (Ref: 14/12/16/3/3/2/360/AM5/1 and Ref: 14/12/16/3/3/2/360/AM5/2).

It is noted that the EA granted in 2013 contained the following conditions:

- 26. A Site Management Plan must be development (sic) for Site Sannas-1 (an informal cemetery of approximately 13 graves oriented east to west, with stone dressing) and Site Sannas-5 (a formal cemetery of approximately 08 graves oriented east to west, with granite dressing and headstones). Both these sites must be fenced and provided with a secure access gate. The fencing must be placed 2m away from the perimeter of the graves. No development is allowed within 15m from the fenceline surrounding the graves.
- 27. Site Sannas-3 must be documented and a permit must be obtained from the relevant authority for the demolition of this stone shed.
- 28. A qualified palaeontologist must be commissioned to undertake a ground reconnaissance before commencement of any construction activities and the construction manager and ECO must report any fossil finds encountered during construction activities

As a result of the above EA conditions, a PIA and Heritage Management Plan has been submitted to SAHRA for review (13/09/2021).

Bamford, M. 2021. Palaeontological Impact Assessment for the proposed Sannaspos Photo voltaic Facility, Farms Lejwe and Besemkop, Free State Province. Site Visit (Phase 2) Report.

The site visit did not reveal any fossils within the project footprint. A Fossil Chance Finds Procedure should be added to the EMPr.

Lavin, J. 2021. Heritage Conservation Management Plan for the approved Sannaspos Photovoltaic Facility near Bloemfontein in the Free State Province.

The HMP contains management procedures for the two cemeteries identified during the HIA process i.e. Site Sannas-1 and Site Sannas-5, and general Chance Finds Procedures. The HMP includes conservation and management requirements, guidelines for consultation procedures, and a monitoring and site maintenance



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action plan. The HMP makes note that a section 34 permit must be applied for from Heritage Free State for Site Sannas -3.

Currently, Engie Solar Africa has been awarded the preferred bidder status as part of the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) and require updated comments from SAHRA.

Final Comment

As the NEMA EIA process has long since been concluded, SAHRA cannot provide approval or note any objections to the approved Sannaspos PV facility, powerlines and grid infrastructure (Ref: 14/12/16/3/3/2/360/AM5/1 and Ref: 14/12/16/3/3/2/360/AM5/2) in terms of NEMA. The applicant is advised to note and implement the following:

- The recommendations provided by the heritage specialists during the EIA phase are supported;
- The recommendations provided in the Phase 2 PIA and HMP are supported;
- No comments are required from the Heritage Free State (HFS) in this regard, however, if a permit in terms of section 34 of the NHRA is required at any point for the development, this must be applied for from the HFS;
- If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Ngqalabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- See section 51 of the NHRA for offences;
- The following conditions apply with regards to the appointment of specialists:
- With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above;
- If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to



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inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA.

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

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/49885>
(DETEA, Ref: 14/12/16/3/3/2/360)