

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
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Enquiries: Sityhilelo Ngcatsha
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CaseID: 17866

Date: Monday August 22, 2022
Page No: 1

Final Comment

In terms of Section 38(8), 38(4) 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 EMPr. 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.

SAHRA issued an interim comment dated 15/02/2022 which requesting a heritage field survey of the expansion footprint to be undertaken and the report of the survey be submitted during the draft Environmental Impact Assessment (EIA) phase.

SAHRA was notified of the submission of the FEIA to the Department of Forestry, Fisheries and the Environment (DFFE) on the 05/08/2022. Page 44 of the FEIA states that the Heritage Screening Report undertaken in the scoping phase concluded that no further assessment of heritage was required to be undertaken in the EIA phase of the process. It also states that no further comments were received from SAHRA in the Scoping Phase of the process and the findings are therefore acceptable.

Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot endorse this proposed

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development and advises the DFFE to reject the proposed expansion of the Sannaspos PV Plant Project on Porton 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 as no HIA that complies with section 24(4)b(iii) of the NEMA and section 38(3) or section 38(8) of the NHRA has been completed as part of the EA application.

This comment must be forwarded directly to the competent authorities and proof of the submission and receipt thereof must be provided to SAHRA.

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

Yours faithfully

Sityhilelo Ngcatsha
Archaeology, Palaeontology, Meteorite Assistant
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/592042>

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