

COMMENTS RECEIVED DURING SCOPING
REPORT FOR PUBLIC REVIEW:
ORGANS OF STATE

COMMENTS RECEIVED FROM:
DEPARTMENT OF ENVIRONMENTAL AFFAIRS
(DEA)



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA · 0001· Environment House · 473 Steve Biko, Arcadia· PRETORIA
Tel (+ 27 12) 399 9372

DEA Reference: 14/12/16/3/3/2/1107

Enquiries: Mr Thando Booï

Telephone: (012) 399 9387 E-mail: TBooi@environment.gov.za

Karen Jodas
Savannah Environmental (Pty) Ltd
P.O. Box 148
Sunninghill
2157

Telephone Number: (011) 656 3237
Email Address: karen@savannahsa.com

PER E-MAIL / MAIL

Dear Ms Jodas

COMMENTS ON THE DRAFT SCOPING REPORT FOR PROPOSED ALLEPAD PV THREE, 100 MW PHOTOVOLTAIC SOLAR ENERGY GENERATION FACILITY AND ASSOCIATED INFRASTRUCTURE NEAR UPINGTON, NORTHERN CAPE PROVINCE

The application form and draft Scoping Report (SR) dated October 2018 as received by this Department on 12 October 2018 refers.

This Department has the following comments on the abovementioned application:

Alternatives

It has been noted that the location, design and layout as well as no-go alternatives have been included in the draft report, taking into consideration the advantages and disadvantages as why the site is believed to be the preferred. Therefore, should there be any other alternatives considered, you are required to include the information in the final SR.

Impacts Assessment

This Department requests the EAP to familiarise themselves with the requirements of Appendix 2 of GNR 982 of the EIA Regulations, 2014 (as amended) and ensure that the final SR submitted to this Department for consideration meets the requirements in terms of identifying, assessing and providing mitigation measures of the impacts on the alternatives and preferred site.

Maps

Please provide the following maps depicting the footprint of each project specific site, instead of maps that are illustrating the whole site for all four proposed projects. Note that this request applies for the four applications, i.e.1105; 1106; 1107 and 1108 respectively.

- **Locality Map**

An A3 locality map. The scale of the locality map must be relevant to the size of the development (at least 1:50 000. For linear activities of more than 25 kilometres, a smaller scale e.g. 1:250 000 can be used. The scale must be indicated on the map).

The map must indicate the following:

- an accurate indication of the project site position as well as the positions of the alternative sites, if any; indication of all the alternatives identified; closest town(s)
- road access from all major roads in the area;
- road names or numbers of all major roads as well as the roads that provide access to the site(s);
- all roads within a 1km radius of the site or alternative sites; and
- a north arrow; a legend and locality: GPS co-ordinates must indicate the position of the activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates must be provided in degrees, minutes and seconds. The projection that must be used in all cases is the Hartebeesthoek94 WGS84 co-ordinate system, in line with Regulation 5(6) of the EIA Regulations, 2014 as amended.

- **A3 Layout map**

A copy of the final site layout map. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible e.g. roads. The layout map must indicate the following:

- Photovoltaic facility footprint and its associated infrastructure;
- Temporary construction camp;
- Permanent laydown area footprint;
- Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible);
- Wetlands, drainage lines, rivers, stream and water crossing of roads and cables indicating the type of bridging structures that will be used;
- The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;
- Substation(s) and/or transformer(s) sites including their entire footprint;
- Connection routes (including pylon positions) to the distribution/transmission network;
- All existing infrastructure on the site, especially roads;
- Buffer areas;
- Buildings, including accommodation; and
- All "no-go" areas.

- **A3 Sensitivity Map**

The layout plan as indicated above must be overlain with a sensitivity map that indicates all the sensitive areas associated with the site, including, but not limited to:

- Watercourses, drainage lines
- the 1:100 year flood line (where available or where it is required by DWS);
- ridges;
- cultural and historical features;
- areas with indigenous vegetation (even if it is degraded or infested with alien species);
- critical biodiversity areas
- Buffer areas; and
- No-go areas.

Public Participation Process

- Please ensure that all issues raised and comments received during the circulation of the SR from the 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 of the attempts that were made to obtain comments must be submitted to the Department.
- The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.

General Comments

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 amended EIA Regulations, 2014.

Further note that in terms of Regulation 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of the 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 faithfully



Mr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations

Department of Environmental Affairs

Signed by: Ms Olivia Letlalo

Designation: Control Environmental Officer: Strategic Infrastructure Developments

Date: 02/11/2018

cc:	Louise van Heerden	ILEnergy Developments (Pty) Ltd	Tel: (072) 793 9133	Email: louis@lenergysa.com
	Bryan Fischer	Northern Cape: DENC	Tel: (054) 307 7431	Email: BFisher@ncpg.gov.za
	Elias Ntoba	Dawid Kruiper Local Municipality	Tel: (054) 338 7001	Email:manager@kharais.gov.za

COMMENTS RECEIVED FROM:
ESKOM

Savannah Environmental Public Process

From: John Geeringh <GeerinJH@eskom.co.za>
Sent: 06 November 2018 9:07 AM
To: Savannah Environmental Public Process
Subject: FW: Allepad PV 1-4
Attachments: Eskom requirements for work in or near Eskom servitudes SOLAR (3).doc; Renewable Energy Generation Plant Setbacks to Eskom Infrastructure - Signed.pdf

See attached
John




From: John Geeringh
Sent: 01 November 2018 09:27 AM
To: Nicolene Venter (nicolene@savannahsa.com)
Subject: Allepad PV 1-4

Please find attached Eskom requirements for works at or near Eskom infrastructure. Please send me KMZ files of the affected properties. Please send me the DEA reference numbers as soon as they become available

Kind Regards

John Geeringh (Pr Sci Nat)
Senior Consultant Environmental Management
Group Capital Division: Land Development and Management
Megawatt Park, D1Y42, Maxwell Drive, Sunninghill, Sandton.
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	SCOT	Technology
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Title: **Renewable Energy Generation Plant Setbacks to Eskom Infrastructure** Unique Identifier: **240-65559775**

Alternative Reference Number: **N/A**

Area of Applicability: **Power Line Engineering**

Documentation Type: **Guideline**

Revision: **0**

Total Pages: **8**

Next Review Date: **N/A**

Disclosure Classification: **CONTROLLED DISCLOSURE**

Compiled by



J W Chetty
Mechanical Engineer

Date: 20/02/2014

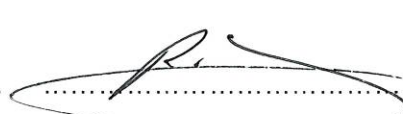
Approved by



V Naidoo
Chief Engineer (Lines)

Date: 24/02/2014


Authorised by



R A Vajeth
Acting Snr Manager (Lines)

Date: 27/2/2014

Supported by SCOT/SC



R Vajeth
SCOT/SC/ Chairperson

Date: 27/2/2014

PCM Reference: 240-65132732 **LINE ENGINEERING SERVICES**

SCOT Study Committee Number/Name : **OVERHEAD LINES**

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EXECUTIVE SUMMARY

In recent decades, the use of wind turbines, concentrated solar plants and photovoltaic plants have been on the increase as it serves as an abundant source of energy. This document specifies setbacks for wind turbines and the reasons for these setbacks from infrastructure as well as setbacks for concentrated solar plants and photovoltaic plants. Setbacks for wind turbines employed in other countries were compared and a general setback to be used by Eskom was suggested for use with wind turbines and other renewable energy generation plants.

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1. INTRODUCTION

During the last few decades, a large amount of wind turbines have been installed in wind farms to accommodate for the large demand of energy and depleting fossil fuels. Wind is one of the most abundant sources of renewable energy. Wind turbines harness the energy of this renewable resource for integration in electricity networks. The extraction of wind energy is its primary function and thus the aerodynamics of the wind turbine is important. There are many different types of wind turbines which will all exhibit different wind flow characteristics. The most common wind turbine used commercially is the Horizontal Axis Wind Turbine. Wind flow characteristics of this turbine are important to analyse as it may have an effect on surrounding infrastructure.

Wind turbines also cause large turbulence downwind that may affect existing infrastructure. Debris or parts of the turbine blade, in the case of a failure, may be tossed behind the turbine and may lead to damage of infrastructure in the wake path.

This document outlines the minimum distances that need to be introduced between a wind turbine and Eskom infrastructure to ensure that debris and / or turbulence would not negatively impact on the infrastructure.

Safety distances of wind turbines from other structures as implemented by other countries were also considered and the reasons for their selection were noted.

Concentrated solar plants and photovoltaic plants setbacks away from substations were also to be considered to prevent restricting possible power line access routes to the substation.

2. SUPPORTING CLAUSES

2.1 SCOPE

This document provides guidance on the safe distance that a wind turbine should be located from any Eskom power line or substation. The document specifies setback distances for transmission lines (220 kV to 765 kV), distribution lines (6.6 kV to 132 kV) and all Eskom substations. Setbacks for concentrated solar plants and photovoltaic plants are also specified away from substations.

2.1.1 Purpose

Setbacks for wind turbines and power lines / substations are required for various reasons. These include possible catastrophic failure of the turbine blade that may release fragments and which may be thrown onto nearby power lines that may result in damage with associated unplanned outages. Turbulence behind the turbine may affect helicopter flight during routine Eskom live line maintenance and

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inspections that may lead to safety risk of the aircraft / personnel. Concentrated solar plants and photovoltaic plants setback away from substations were required to prevent substations from being boxed in by these renewable generation plants limiting line route access to the substations.

2.1.2 Applicability

This document is applicable to the siting of all new and existing wind turbines, concentrated solar plants and photovoltaic plants near power lines and substations.

2.2 NORMATIVE/INFORMATIVE REFERENCES

2.2.1 Normative

1. <http://www.envir.ee/orb.aw/class=file/action=preview/id=1170403/Hiiumaa+turbulence+impact+EMD.pdf>.
2. <http://www.energy.ca.gov/2005publications/CEC-500-2005-184/CEC-500-2005-184.PDF>
3. <http://www.adamscountywind.com/Revised%20Site/Windmills/Adams%20County%20Ordinance/Adams%20County%20Wind%20Ord.htm>
4. http://www.dsireusa.org/incentives/incentive.cfm?Incentive_Code=PA11R&RE=1&EE=1
5. <http://www.wind-watch.org/documents/european-setbacks-minimum-distance-between-wind-turbines-and-habitations/>
6. <http://www.publications.parliament.uk/pa/ld201011/ldbills/017/11017.1-i.html>
7. http://www.caw.ca/assets/pdf/Turbine_Safety_Report.pdf
8. Rogers J, Slegers N, Costello M. (2011) A method for defining wind turbine setback standards. Wind energy 10.1002/we.468

2.2.2 Informative

None

2.3 DEFINITIONS

Definition	Description
Setback	The minimum distance between a wind turbine and boundary line/dwelling/road/infrastructure/servitude etc.
Flicker	Effect caused when rotating wind turbine blades periodically cast shadows
Tip Height	The total height of the wind turbine ie. Hub height plus half rotor diameter (see Figure1)

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2.3.1 Disclosure Classification

Controlled disclosure: controlled disclosure to external parties (either enforced by law, or discretionary).

2.4 ABBREVIATIONS

Abbreviation	Description
None	

2.5 ROLES AND RESPONSIBILITIES

All personnel involved in the positioning wind turbines, concentrated solar plants and photovoltaic plants near power lines/substations must follow the setbacks outlined in this guideline.

2.6 PROCESS FOR MONITORING

Approval by Eskom in writing.

2.7 RELATED/SUPPORTING DOCUMENTS

None

3. DOCUMENT CONTENT

3.1 INTERNATIONAL SETBACK COMPARISON

Wind Turbine setbacks employed by various countries were considered. It was found that setbacks were determined for various reasons that include noise, flicker, turbine blade failure and wind effects. The distances (setbacks) varied based on these factors and were influenced by the type of infrastructure

Wind turbine setbacks varied for roads, power lines, dwellings, buildings and property and it was noted that the largest setbacks were employed for reasons of noise and flicker related issues [1-7]. Very few countries specified setbacks for power lines.

The literature survey [1-7], yielded information about studies and experiments were conducted to determine the distance that a broken fragment from a wind turbine might be thrown. Even though of low probability of hitting a power line [5.0×10^{-5}]^[8], the distances recorded were significant [750m]^[8]

Setbacks were thus introduced to prevent any damage to Eskom infrastructure.

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Wind turbines may also cause changes in wind patterns with turbulent effects behind the hub. These factors dictate the wind turbine setbacks specified in this document.

Concentrated solar plants and photovoltaic plants also can limit access into the substation for power lines of all voltages. A setback distance must therefore be employed to prevent the substation from being boxed in by these generation plants. These setback distances are specified in this document.

3.2 ESKOM REQUIRED SETBACKS

- Eskom requires a setback distance of 3 times the tip height of the wind turbine from the edge of the closest Eskom servitude (including vacant servitudes) for transmission lines.
- Eskom requires a setback distance of 1 times the tip height of the wind turbine from the edge of the closest Eskom servitude (including vacant servitudes) for distribution Lines.
- Eskom must be informed of any proposed wind turbine, concentrated solar plants and photovoltaic activity within a 5 km radius of a substation. No wind turbine structure shall be built within a 2 km radius of the closest point of the substation. Where concentrated solar plants and photovoltaic structures fall within a 2 km radius of the closest point of a substation, Eskom should be informed in writing during the planning phase of the construction of such plant or structure.
- Applicants must show that Eskom radio telecommunication systems (mainly microwave systems) will not be affected in any way by wind turbines.

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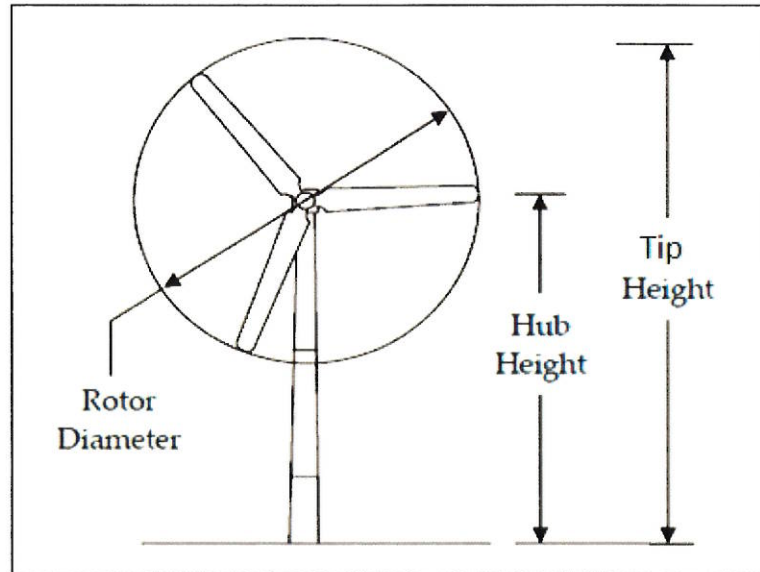


Figure 1: Horizontal Axis Wind Turbine ^[2]

4. AUTHORISATION

This document has been seen and accepted by:

Name & Surname	Designation
V Naidoo	Chief Engineer
Dr P H Pretorius	Electrical Specialist
J Geeringh	Snr Consultant Environ Mngt
B Haridass	Snr Consultant Engineer
R A Vajeth	Acting Snr Manager (Lines)

5. REVISIONS

Date	Rev.	Compiler	Remarks
November 2013	0	J W Chetty	First Publication - No renewable energy generation plant setback specification in existence

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6. DEVELOPMENT TEAM

The following people were involved in the development of this document:

Jonathan W Chetty (Mechanical Engineer)

Vivendhra Naidoo (Chief Engineer)

Dr Pieter H Pretorius (Electrical Specialist)

John Geeringh (Snr Consultant Environ Mngt)

Bharat Haridass (Snr Consultant Engineer)

Riaz A Vajeth (Acting Snr Manager (Lines))

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Eskom requirements for work in or near Eskom servitudes.

1. Eskom's rights and services must be acknowledged and respected at all times.
2. Eskom shall at all times retain unobstructed access to and egress from its servitudes.
3. Eskom's consent does not relieve the developer from obtaining the necessary statutory, land owner or municipal approvals.
4. Any cost incurred by Eskom as a result of non-compliance to any relevant environmental legislation will be charged to the developer.
5. If Eskom has to incur any expenditure in order to comply with statutory clearances or other regulations as a result of the developer's activities or because of the presence of his equipment or installation within the servitude restriction area, the developer shall pay such costs to Eskom on demand.
6. The use of explosives of any type within 500 metres of Eskom's services shall only occur with Eskom's previous written permission. If such permission is granted the developer must give at least fourteen working days prior notice of the commencement of blasting. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued in terms of the blasting process. It is advisable to make application separately in this regard.
7. Changes in ground level may not infringe statutory ground to conductor clearances or statutory visibility clearances. After any changes in ground level, the surface shall be rehabilitated and stabilised so as to prevent erosion. The measures taken shall be to Eskom's satisfaction.
8. Eskom shall not be liable for the death of or injury to any person or for the loss of or damage to any property whether as a result of the encroachment or of the use of the servitude area by the developer, his/her agent, contractors, employees, successors in title, and assignees. The developer indemnifies Eskom against loss, claims or damages including claims pertaining to consequential damages by third parties and whether as a result of damage to or interruption of or interference with Eskom's services or apparatus or otherwise. Eskom will not be held responsible for damage to the developer's equipment.
9. No mechanical equipment, including mechanical excavators or high lifting machinery, shall be used in the vicinity of Eskom's apparatus and/or services, without prior written permission having been granted by Eskom. If such permission is granted the developer must give at least seven working days' notice prior to the commencement of work. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued by the relevant Eskom Manager

Note: Where and electrical outage is required, at least fourteen work days are required to arrange it.

10. Eskom's rights and duties in the servitude shall be accepted as having prior right at all times and shall not be obstructed or interfered with.
11. Under no circumstances shall rubble, earth or other material be dumped within the servitude restriction area. The developer shall maintain the area concerned to Eskom's satisfaction. The developer shall be liable to Eskom for the cost of any remedial action which has to be carried out by Eskom.
12. The clearances between Eskom's live electrical equipment and the proposed construction work shall be observed as stipulated by *Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993)*.
13. Equipment shall be regarded electrically live and therefore dangerous at all times.
14. In spite of the restrictions stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993), as an additional safety precaution, Eskom will not approve the erection of houses, or structures occupied or frequented by human beings, under the power lines or within the servitude restriction area.
15. Eskom may stipulate any additional requirements to highlight any possible exposure to Customers or Public to coming into contact or be exposed to any dangers of Eskom plant.
16. It is required of the developer to familiarise himself with all safety hazards related to Electrical plant.
17. Any third party servitudes encroaching on Eskom servitudes shall be registered against Eskom's title deed at the developer's own cost. If such a servitude is brought into being, its existence should be endorsed on the Eskom servitude deed concerned, while the third party's servitude deed must also include the rights of the affected Eskom servitude.

John Geeringh (Pr Sci Nat)

Senior Consultant Environmental Management
Eskom GC: Land Development

COMMENTS RECEIVED FROM:
SOUTH AFRICAN NATIONAL ROADS AGENCY
(SANRAL)

Rozanne Els

From: Nicolene Venter <nicolene@savannahsa.com>
Sent: 06 November 2018 5:43 PM
To: abrahamsn@nra.co.za
Cc: 'Thalita Botha'; 'Sarah Watson'; 'Rozanne Els'
Subject: RE: Request for Comment: Allepad Scoping Report for public review

Good Day Nicole,

With reference to your enquiry below, I would like to confirm that the reference made to a “pipeline”.

Please be informed that the solid yellow line on the locality map is the 300m wide power line corridor (for environmental assessment purposes).

In terms of your request for the number appearing on the nearest blue km marker board along the N10, this will be forwarded as soon as it is available.

Also, we herewith confirm that you are registered as a Key Stakeholder on the above-mentioned projects’ databases.

Kind regards,

Nicolene Venter

Public Participation & Social Consultant | Savannah Environmental (Pty) Ltd
Tel: +27 (0)11 656 3237 | Fax: +27 (0)86 684 0547

[SAWEA Award for Leading Environmental Consultant for Wind Projects in 2013 & 2015](#)

From: Nicole Abrahams (WR) [<mailto:AbrahamsN@nra.co.za>]
Sent: 06 November 2018 3:11 PM
To: Savannah Environmental Public Process <publicprocess@savannahsa.com>
Cc: René de Kock (WR) <Dekockr@nra.co.za>
Subject: RE: Request for Comment: Allepad Scoping Report for public review

Dear Nicolene

The above listed project bears reference.

I would hereby wish to register as an I&AP for this particular project.

The South African National Roads Agency SOC Limited (SANRAL) has received background information and a site layout plan for this project and based on the proximity of the pipeline in relation to the National Road N10, it appears that SANRAL could be impacted by this development.

Could you also indicate the number appearing on the nearest blue km marker board on N10.

If services need to be constructed over or under the national road, (in this case the N10) or within 60m measured from the road reserve fence, the service owner must apply for a written permission from SANRAL, before any work may be carried out. Attached please find an application form for the proposed encroachment.

Do not hesitate to contact the sender should you have any further queries.

I trust that you will find the above in order.

Regards

Nicole Abrahams

Environmental Coordinator

Western Region

, Bellville, Western Cape, 7530,

T: 021 957 4602 | M: 062 215 8945

AbrahamsN@nra.co.za | www.sanral.co.za

Fraud Hotline Number - 0800 204 558



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From: Savannah Environmental Public Process <publicprocess@savannahsa.com>

Sent: Tuesday, November 6, 2018 10:32 AM

To: Nicole Abrahams (WR) <AbrahamsN@nra.co.za>

Subject: Request for Comment: Allepad Scoping Report for public review

Importance: High

Dear Nicole,

With reference to the attached notification letter in regards to the availability of the Scoping Report for public review for the four Allepad PV Facilities, we noted that we have not yet received written comment from SANRAL.

This e-mail serves as a reminder that the comment period for the above mentioned project ends on **Monday, 12 November 2018.**

It would be appreciated if you can submit written comment before or on **Monday, 12 November 2018** by close of business.

Should you not have any comments, please inform us accordingly.

Kind regards,



Public Process

t: 011 656 3237

f: 086 684 0547

e: publicprocess@savannahsa.com

c:

COMMENTS RECEIVED FROM:
SOUTH AFRICAN HERITAGE RESOURCE
AGENCY (SAHRA)



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: 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

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 13047

Date: Thursday November 08, 2018
Page No: 1

Interim Comment

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

Attention: IL Energy Development (Pty) Ltd

Project Name: Allepad PV Three Applicant: ILEnergy Development (Pty) Ltd Proposed Activity: The development of a 100MW Photovoltaic (PV) facility and associated infrastructure, including the following infrastructure: » Arrays of PV panels with a generation capacity of up to 100MW. » Mounting structures to support the PV panels. » Combiner boxes, on-site inverters (to convert the power from Direct Current (DC) to Alternating Current (AC)), and power transformers. » A 132kV on-site substation up to 1ha in extent to facilitate the connection between the solar energy facility and the Eskom electricity grid. » A new 132kV power line approximately 5km in length, between the on-site substation and Eskom grid connection point. » Cabling between the project's components (to be laid underground where practical). » Meteorological measurement station. » Energy storage area of up to 2ha in extent. » Access road and internal access road network. » On-site buildings and structures, including a control building and office, ablutions and guard house. » Perimeter security fencing, access gates and lighting. » Temporary construction equipment camp up to 1ha in extent, including temporary site offices, parking and chemical ablution facilities. » Temporary laydown area up to 1ha in extent, for the storage of materials during the construction. Project Location: The site is located approximately 11km north-west of Upington, in the Northern Cape, with the following properties identified for the development of the four PV facilities, and the supporting grid connection infrastructure: PV facilities: » Remaining Extent of Erf 5315 Upington Grid connection: » Remaining Extent of Erf 5315 Upington » Erf 01 Upington

Savannah Environmental (Pty) Ltd has been appointed by ILEnergy Development (Pty) Ltd to conduct an Environmental Authorisation (EA) Application process for the proposed Allepad PV Three facility, near Upington, Northern Cape Province. A draft Scoping Report (DSR) has been completed in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include the construction of an array of PV panels with a generation capacity of up to 100 MW, mounting structures for the PV panels, electrical infrastructure, on-site substation, powerline, cabling, energy storage area, access roads, control building, offices, ablutions, guard house, temporary construction camp and laydown area.

CTS Heritage had been appointed to provide heritage input into the EA Application process as per section

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
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 13047

Date: Thursday November 08, 2018
Page No: 2

38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Lavin, J. 2018. Heritage Screener. Proposed development of Allepad PV Three, a solar PV Facility and associated infrastructure on a site near Upington, in the Northern Cape Province.

The Heritage Screener showed that the heritage resources in the proposed development area have not been sufficiently recorded, and that an archaeological field assessment be conducted to inform a full Heritage Impact Assessment (HIA). The Heritage Screener indicated that the development area is of low palaeontological sensitivity and therefore no further assessment of palaeontological resources is required.

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit notes the submitted Heritage Screener and awaits the pending HIA. SAHRA does not accept the recommendation of the Heritage Screener that no further assessment of palaeontological resources is required. The SAHRIS PalaeoSensitivity map shows that the development area is located within an area of moderate palaeontological sensitivity and therefore a desktop assessment of palaeontological resources is required. The assessment must comply with the 2012 SAHRA Minimum Standards: Palaeontological Components of Heritage Impact Assessments and must be compiled by a qualified palaeontologist. The 2012 Minimum Standards makes reference to a Letter of Recommendation for Exemption that may be submitted, should the palaeontologist deem is necessary.

SAHRA awaits the pending HIA inclusive of an archaeological and palaeontological component, that takes into consideration the results of the Visual Impact Assessment and any heritage related comments during the public review periods, along with the Final Scoping report and the draft EIA with associated appendices when available for public review before further comments are issued.

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

Yours faithfully

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Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

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

ADMIN:
Direct URL to case: <http://www.sahra.org.za/node/513606>

COMMENTS RECEIVED FROM:
AIR TRAFFIC AND NAVIGATION SERVICES
(ANTS)

Savannah Environmental Public Process

From: Simphiwe Masilela <SimphiweM@atns.co.za>
Sent: 08 November 2018 2:57 PM
To: Savannah Environmental Public Process
Cc: Graham Mondzinger; Francois Coetzee
Subject: RE: Request for Comment: Allepad Scoping Report for public review



Good day,

RE: PV PROJECTS NEAR UPINGTON IN THE NORTHERN CAPE ALLEPAD PV ONE, ALLEPAD PV TWO, ALLEPAD PV THREE, AND ALLEPAD PV FOUR

Please note that ATNS is aware of the above mentioned.

The area in which the proposed Allepad PV will be situated falls within the boundaries of the ICAO Annex 14 surfaces and Procedures of Air Navigation Services Operations associated with Upington Airport, therefore we cannot verify whether the proposed will affect the safety of flights, we would have to conduct a formal assessment once the project is ready for construction. You may be required to have a glint and glare impact assessment done as per SACAA requirement (refer to: **Obstacle Notice 4/2017 (17/11/2017): Additional Requirements for Solar Project Applications**)

Please update us should there be any new developments that may affect our interests.

For future projects please forward all queries to ObstacleEvaluators@ats.co.za

For note for us to carry out a successful assessment we require the following information:

1. LOCATION (Co-ordinates WGS84 system)
2. SITE/GROUND ELEVATION (AMSL)
3. HEIGHT TO TOP OF PROPOSED DEVELOPMENT (in meters)

Please also note that there is a fee attached to the Obstacle Evaluations for all formal applications following the EIA process.

Kind Regards,

Simphiwe Masilela

Obstacle Evaluator | COO - Air Traffic Services
ATNS Head Office, Bruma, Johannesburg, South Africa

T: +2711 607 1228 • F: 011 607 1466 • C:
E: SimphiweM@atns.co.za • W: www.atns.com



[View Disclaimer](#)

From: Savannah Environmental Public Process [mailto:publicprocess@savannahsa.com]

Sent: Tuesday, November 06, 2018 9:03 AM

To: Simphiwe Masilela <SimphiweM@atns.co.za>

Subject: Request for Comment: Allepad Scoping Report for public review

Importance: High

Dear Simphiwe,

With reference to the attached notification letter in regards to the availability of the Scoping Report for public review for the four Allepad PV Facilities, we noted that we have not yet received written comment from ATNS.

This e-mail serves as a reminder that the comment period for the above mentioned project ends on **Monday, 12 November 2018**.

It would be appreciated if you can submit written comment before or on **Monday, 12 November 2018** by close of business.

Should you not have any comments, please inform us accordingly.

Kind regards,

savannah
environmental

Public Process

t: 011 656 3237

f: 086 684 0547

e: publicprocess@savannahsa.com

c:

[SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015](#)

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COMMENTS RECEIVED FROM:
SOUTH AFRICAN RADIO ASTRONOMY
OBSERVATORY (SARO)

Savannah Environmental Public Process

From: Musa Baloye <mbaloye@ska.ac.za>
Sent: 14 November 2018 10:24 AM
To: publicprocess@savannahsa.com; rozanne@savannahsa.com
Cc: Thato Nape; Tshegofatso Monama; Selaelo Matlhane
Subject: RE: DRAFT IMPACT ASSESSMENT REPORT FOR ALLEPAD PV FACILITIES
Attachments: SRAO response to Savannah_November 2018 (1) - signed.pdf

Dear Rozanne Els

Please kindly find the attached letter from SRAO.

Thank you.

Kind regards

--

Musa Baloye

Project Coordinator

South African Radio Astronomy Observatory (SRAO)

17 Baker Street, Rosebank, Johannesburg, 2196

Email: mbaloye@ska.ac.za

Website: www.ska.ac.za

Comments received during of Environmental Impact
Assessment Report for review and comment period
(to be included in Final EIAr)