

Comments Received

Revised

## Basic Assessment Report

(Friday, 11 December 2020 – Monday, 01 February 2021)

## Ronald Baloyi

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**From:** Savannah Public Process  
**Sent:** Thursday, 28 January 2021 11:01  
**To:** fdconradie@roggeveld.co.za  
**Cc:** Ronald Baloyi  
**Subject:** GUNSTFONTEIN WEF - Beantwoording van versoek rakende kraglynroete

Tracking:	Recipient	Delivery
	fdconradie@roggeveld.co.za	
	Ronald Baloyi	Delivered: 2021/01/28 11:01

More Francois,

Die betrokke Gunstfontein Uitbreiding van die Oorhoofse-kraglyn projek sal op die volgende eiendomme geleë wees:

- Restant van Gedeelte 1 van die Plaas Orange Fontein 203 (Mev Jordaan)
- Restant van die Plaas Annex Orange Fontein 185 (Mev Jordaan)
- Restant van die Plaas Leeuwe Hoek 183 (Mev Jordaan)
- Die Plaas De Hoop 202 (Eldri Van Zyl)

Ons kan dus bevestig dat jou please Standvastigheid en Appelsfontein nie deur die projek se kraglynroete geraak word nie.

Vriendelike groete



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

Nicolene Venter  
**Public Process**

e: [Publicprocess@savannahsa.com](mailto:Publicprocess@savannahsa.com)  
c: +27 (0)60 978 8396

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

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**From:** fdconradie@roggeveld.co.za <fdconradie@roggeveld.co.za>  
**Sent:** Wednesday, January 27, 2021 9:02 AM  
**To:** Savannah Public Process <publicprocess@savannahsa.com>  
**Subject:** RE: GUNSTFONTEIN WEF - Power Line Extension: Reminder of commenting period ending soon

Goeiedag

Ek neem kennis van u beplanning van Gunsfontein windplaas.

As eienaar van Standvastigheid en Appelfontein vra ek u om die roetes van u 123kv lyn te beplan dat u nie nodig het om oor my eiendom te gaan nie.

Die uwe

Francois Conradie

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**From:** Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>

**Sent:** Monday, 25 January 2021 15:44

**To:** Francois Conradie <[fdconradie@roggeveld.co.za](mailto:fdconradie@roggeveld.co.za)>

**Subject:** GUNSTFONTEIN WEF - Power Line Extension: Reminder of commenting period ending soon

**EXTENTION OF GRID CONNECTION INFRASTRUCTURE FOR THE GUNSTFONTEIN WIND FARM, NORTHERN CAPE PROVINCE**

**(DEFF Ref.No.: 14/12/16/3/3/1/2228)**

Dear Stakeholder and Interested and Affected Party,

With reference to the attached notification letter sent on Friday, 11 December 2020 per e-mail, this e-mail serves to inform you that the comment period for the Basic Assessment Report (BAR) is ending on **Monday, 01 February 2021**.

As you may recall, the review and comment period for the BAR was from Friday, 11 December 2020 to Monday, 01 February 2021.

Thank you to those Stakeholders and Interested and Affected Parties who submitted their written comments and those who had not yet submitted written comments, we kindly request that you do so before or on **Monday, 01 February 2021**

Kind regards,

[Unsubscribe this type of email](#)

savannah  
environmental

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

BREEDE-GOURITZ

# BREDE-GOURITZ

Catchment Management Agency  
Opvanggebied Bestuursagentskap  
I-Arhente yoLawulo lomMandla nokungqongileyo

P.O Box 1205 / 101 York Street  
George, 6530

✉: Mr.M Mthimkhulu  
✉: mmthimkhulu@bgcma.co.za

☎: 023-346 8000

📁: 4/10/2/J11A/Gunsfontein farm

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

**Attention:** Thalitha Botha

Dear Madam

## **COMMENTS ON THE PROPOSED GUNSTFONTEIN SWITCHING STATION, 132 KV OVERHEAD POWER LINE & ANCILLARY INFRASTRUCTURE FOR THE PORPOSED GUNSTFONTEIN WIND FARM NEAR SUTHERLAND, NORTHERN CAPE PROVINCE**

The above mentioned report, dated 22 August 2016 has reference.

The Breede-Gouritz Catchment Management Agency (BGCMA) has the following comments:

1. No operation is allowed within 100m of a water resource or 1:100 year floodline whichever is the greatest. If the proposed activity falls within these criteria, you need to apply for water use license to ensure that the riparian ecological status of the water resource will not be negatively impacted.
2. Refer to page 50 of your report. The crossing of watercourses constitutes a Water Use authorisation in terms of section 21 of the National Water Act (NWA) 1998(Act No. 36 of 1998). Please submit a Water Use License application to this Agency.
3. Please note that no water maybe abstracted from any surface water body and groundwater unless authorized by this Agency.
4. No surface, ground or storm water may be polluted as a result of any activities on the site.
5. The rehabilitation of the site must ensure that the final conditions of the site is environmentally acceptable and that there will be no adverse long term effects on the surrounding environment especially the water resources.

6. Please note that all requirements as stipulated in the National Water Act (NWA) 1998(Act No. 36 of 1998) must be adhered to.
7. Please note that this Agency reserves the right to amend and / or add to the comments made above in the light of subsequent information received.

If you have any questions please don't hesitate to contact the official at the above mentioned details.

Kind Regards

**PHAKAMANI BUTHELEZI**

P.P.   
**CHIEF EXECUTIVE OFFICER**

**DATE: 26 August 2016**

DEFF





## environment, forestry & fisheries

Department:  
Environment, Forestry and Fisheries  
REPUBLIC OF SOUTH AFRICA

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

DEA Reference: 14/12/16/3/3/1/2228

Enquiries: Matlhodi Mogorosi

Telephone: (012) 399 9388 E-mail: MMogorosi@environment.gov.za

Ms Jo-Anne Thomas  
Savannah Environmental (Pty) Ltd  
PO Box 148  
SUNNINGHILL  
2191

Telephone Number: (011) 656 3237 / (011) 656 3256  
Email Address: joanne@savannahsa.com

### PER MAIL / E-MAIL

Dear Ms Thomas

### COMMENTS ON THE AMENDED DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED GRID CONNECTION EXTENSION INFRASTRUCTURE FOR THE GUNSTFONTEIN WIND FARM, NEAR SUTHERLAND WITHIN THE KAROO HOOGLAND LOCAL MUNICIPALITY IN THE NORTHERN CAPE PROVINCE

The amended draft Basic Assessment Report (BAR) dated December 2020 and received by this Department on 11 December 2020, refer.

This letter serves to inform you that the following information must be included to the final BAR:

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

- i. 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. Only activities applicable to the development must be applied for and assessed.
- ii. It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of GN R. 985 Activities. Written comments (or proof of the request thereof) must be obtained from the relevant provincial environmental authority and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.

#### (b) **Alternatives**

- i. Kindly provide extensive motivation, if no reasonable or feasible alternatives exist in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended.

#### (c) **Public Participation Process**

- i. The following information must be submitted with the final BAR:
  - a) A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended;
  - b) Copies of all comments received during the amended draft BAR comment period; and
  - c) A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the amended draft

FG.

BAR. Please note that comments received from this Department must also form part of the comment and response report.

- ii. Please ensure that all issues raised and comments received during the circulation of the amended draft BAR 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 BAR.
- iii. Proof of correspondence with the various stakeholders must be included in the final BAR. 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.

**(d) Environmental Management Programme**

- i. Please ensure that any site specific mitigation measures identified in the BAR and specialist reports have been incorporated into the generic Environmental Management Programme (EMPr).

**General**

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

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 Environment, Forestry and Fisheries**

**Signed by: Ms Fiona Grimett**

**Designation: Deputy Director (Acting): National Infrastructure Projects**

**Date: 01/02/2021**

cc:	Richard Gordon	Gunstfontein Wind Farm (Pty) Ltd	E-mail: stephnie.kot@aced.co.za
	Bryan Fisher	NC: DENC	E-mail: Bfisher@ncpg.gov.za
	JJ Fortuin	Karoo Hoogland Local Municipality	E-mail: munman@karoohoogland.gov.za

ESKOM

## TO WHOM IT MAY CONCERN

### 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)(EAPASA)  
Senior Consultant Environmental Management  
Eskom Transmission Division: Land & Rights  
Megawatt Park, D1Y42, Maxwell Drive, Sunninghill, Sandton.  
P O Box 1091, Johannesburg, 2000.  
Tel: 011 516 7233  
Cell: 083 632 7663  
Fax: 086 661 4064  
E-mail: john.geeringh@eskom.co.za

SARAO

Savannah Environmental Pty (Ltd)  
First Floor, Block 2  
5 Woodlands Drive Office Park  
Cnr Woodlands Drive & Western Service Road  
Woodmead, 2191

Email: [info@savannahsa.com](mailto:info@savannahsa.com)

cc: [nicolene@savannahsa.com](mailto:nicolene@savannahsa.com)

Date: 26 January 2021

To whom it may concern

**RE: REVISED BASIC ASSESSMENT REPORT FOR GUNSTFONTEIN WIND FARM  
EXTENTION OF GRID CONNECTION INFRASTRUCTURE.**

SARAO has completed the risk re-assessment with regard to the electromagnetic emissions of the for the above mentioned project and its possible impact on the SKA radio telescope.

This project will pose a low risk of interference to the SKA and therefore, SARAO does not object to the development of the project.

Thank you for your patience and our office remains open for any discussion relating to this project and its impact on the SKA radio telescope.

Regards,



Mr Selaelo Matlhane  
Spectrum & Telecommunication Manager  
South African Radio Astronomy Observatory (SARAO)  
Tel: 011 442 2434  
Email: [smatlhane@ska.ac.za](mailto:smatlhane@ska.ac.za)

[www.ska.ac.za](http://www.ska.ac.za)

The South African Radio Astronomy Observatory (SARAO) is a National Facility managed by the National Research Foundation and incorporates all national radio astronomy telescopes and programmes. SARAO is responsible for implementing the Square Kilometre Array (SKA) in South Africa.

SAHRA





an agency of the  
Department of Arts and Culture

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Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 15175

Date: Friday January 29, 2021  
Page No: 1

## **Final Comment**

**In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Savannah Environmental (Pty) Ltd

PO Box 148  
Sunninghill  
2157

Gunstfontein Wind Farm (Pty) Ltd proposes the construction and operation of a grid connection solution, known as the “grid extension infrastructure” for the authorised Gunstfontein Wind Farm (DEA Ref: 14/12/16/3/3/2/826), near Sutherland, Northern Cape Province. The grid connection solution will include the development of a double-circuit 132kV overhead power line (known as the Gunstfontein 132kV OHL extension double-circuit power line) to connect the Gunstfontein Wind Farm to the national grid, via the Hidden Valley substation. The proposed 132kV OHL extension will be an extension of the already authorised Gunstfontein Grid Connection (14/12/16/3/3/1/1619). Other associated infrastructure will also be required for the grid connection solution, such as access tracks/roads and laydown areas. A corridor 300m wide and approximately 7.5km long along with an assessment zone of 200m around the starting and terminating substation boundaries (collectively known as the grid corridor) is being assessed to allow for the optimisation of the grid (i.e. eventual micro siting) and associated infrastructure and to accommodate environmental sensitivities and other energy infrastructure currently under construction on the properties. It must be noted that the assessed corridor route is located directly adjacent and parallel to the approved Soetwater power line routing (this powerline connects the Heuwels and Hidden Valley substations, and is currently under construction by Soetwater and Karusa Wind Farms respectively). The proposed development consists of: A double-circuit 132kV overhead power line (known as the Gunstfontein 132kV OHL extension double-circuit power line); and Associated infrastructure: Laydown areas. Access and service tracks. A corridor 300m wide and approximately 7.5km long as well as a 200m wide assessment zone around each of the two substations is being assessed to allow for the optimisation of the grid and associated infrastructure and to accommodate environmental sensitivities. The grid infrastructure (including the power line and associated infrastructure) will be developed within the assessed 300m wide corridor and a 200m assessment zone around each of the substations (known as the grid connection infrastructure). The grid connection infrastructure will be located within a grid connection corridor located directly parallel and approximately 15m west of the authorised Soetwater WEF power line

# Proposed Grid connection extension infrastructure for the Gunstfontein Wind Farm, Northern Cape.

Our Ref: 15175



an agency of the  
Department of Arts and Culture

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Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 15175

Date: Friday January 29, 2021  
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**routing. The height of the power line towers of the 132kV double-circuit power line will be up to 32m and the servitude width of the power line will be up to 40m. The entire extent of the corridor proposed for the development is located within the Komsberg Renewable Energy Development Zone (REDZ) and within the central corridor of the Strategic Transmission Corridors. Access to the grid connection corridor is possible via numerous existing smaller farm roads in close vicinity to the corridor, primarily off the Regional 354 (R354) tarred road running between Matjiesfontein and Sutherland towns. Apart from these existing roads, the authorised Gunstfontein 132kV powerline provides for an access/service track along its length that can also be used to access the corridor. In addition, existing access roads to the Huewels and Hidden Valley substations (currently under construction) will be used to access the start- and end- point of the OHL extension. Formal roads will not be constructed underneath the power line for maintenance purposes, but rather access for maintenance purposes will be limited to jeep tracks running along the length of the line. Where possible, the existing service track for the Soetwater powerline will be utilised.**

Savannah Environmental (Pty) Ltd was appointed by Gunstfontein Wind Farm (Pty) Ltd to conduct an Environmental Authorisation (EA) Application process to extend the authorised Gunstfontein Grid Connection powerline to the authorised Gunstfontein Wind Farm, near Sutherland, Northern Cape Province

A draft Basic Assessment Report (DBAR) was submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed extension of the powerline will include the construction of a 7.5 km single or double circuit 132KV overhead powerline, laydown areas and access and service tracks.

In a Final Comment issued on the 20/11/2020, SAHRA noted no objections to the proposed development and provided conditions for the development (<https://sahris.sahra.org.za/node/546200>).

Since the issuing of the Final Comment, a revised DBAR has been submitted for review noting that a small layout adjustment was required due to capacity issues at the Heuwels Substation. The layout amendment includes by-passing the Heuwels Substation and extending the authorised grid connection to connect to the Hidden Valley Substation.

Cedar Tower Services (Pty) Ltd was appointed to provide heritage specialist input for the revised BAR.

*Lavin, J. 2020. The Proposed Extension of Grid Connection Infrastructure for the Gunstfontein Wind Farm, Northern Cape Province (DEFF Reference: 14/12/16/3/3/1/2228).*



an agency of the  
Department of Arts and Culture

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Enquiries: Natasha Higgitt  
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CaseID: 15175

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The specialist confirmed that the layout adjustment has no material change on the original assessment's findings, impacts and recommendations. The recommendations and findings of the original report therefore will apply to the revised layout.

### **Final Comment**

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed amendment to the authorised development, including the revised layout as noted in the revised DBAR;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development;
- 38(4)c(i) – 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;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 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;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
  - i) 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 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;
- The Final BAR and EMPr must be submitted to SAHRA for record purposes;
- The decision regarding the EA Amendment Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

**Proposed Grid connection extension infrastructure for the Gunsfontein Wind Farm, Northern Cape.**

**Our Ref: 15175**



an agency of the  
Department of Arts and Culture

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Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 15175

Date: Friday January 29, 2021  
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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

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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/537577>

**Terms & Conditions:**

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.

## Basic Assessment Report

(Friday, 04 September 2020 – Monday, 05 October 2020)

DEFF



## environment, forestry & fisheries

Department:  
Environment, Forestry and Fisheries  
REPUBLIC OF SOUTH AFRICA

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

DEA Reference: 14/12/16/3/3/1/2228

Enquiries: Mathodi Mogorosi

Telephone: (012) 399 9388 E-mail: MMogorosi@environment.gov.za

Ms Jo-Anne Thomas  
Savannah Environmental (Pty) Ltd  
PO Box 148  
**SUNNINGHILL**  
2191

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

### PER MAIL / E-MAIL

Dear Ms Thomas

### COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED GRID CONNECTION EXTENSION INFRASTRUCTURE FOR THE GUNSTFONTEIN WIND FARM, NEAR SUTHERLAND WITHIN THE KAROO HOOGLAND LOCAL MUNICIPALITY IN THE NORTHERN CAPE PROVINCE

The draft Basic Assessment Report (BAR) dated September 2020 and received by this Department on 04 September 2020, refer.

This letter serves to inform you that the following information must be included to the final BAR:

#### Listed Activities

- a) 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. Only activities applicable to the development must be applied for and assessed.
- b) If the activities applied for in the application form differ from those mentioned in the final BAR, 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>.
- c) It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property falls within geographically designated areas in terms of GN R. 985 Activities. Written comments (or proof of the attempt to obtain such comments) must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.
- d) It is noted that a number of listed activities within or near watercourses have been applied for, however an aquatic specialist assessment has not been undertaken, as the pylons may be able to span the watercourses, and existing access roads will be used as far as possible. Should the relevant listed activities still be applicable in these circumstances, please ensure that the BAR and EMPr contains appropriate, proven mitigation measures to mitigate the impacts on watercourses to acceptable levels.

#### Layout & Sensitivity Maps

- e) Please provide a layout map which indicates the following:
  - (i) The proposed grid connection extension infrastructure, overlain by the sensitivity map;



- (ii) All supporting onsite infrastructure e.g. roads (existing and proposed);
  - (iii) The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected; and
  - (iv) Buffer areas; and, all "no-go" areas.
- f) The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure.
- g) Google maps will not be accepted.

### **Alternatives**

- h) Kindly provide extensive motivation if no reasonable or feasible alternatives exist in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended

### **Specialist Assessments**

- i) Specialist studies to be conducted must provide a detailed description of their methodology, as well as all other associated infrastructures that they have assessed and are recommending for the authorisation.
- j) 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.
- k) 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 expertise advice.
- l) Specialist Declaration of Interest forms must be attached to the final BAR. You are therefore requested to submit signed Specialist Declaration of Interest forms for each specialist study conducted. The forms are available on Department's website (please use the Department's template).

### **Cumulative Assessment**

- m) 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:
- (i) 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.
  - (ii) 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.
  - (iii) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
  - (iv) A cumulative impact environmental statement on whether the proposed development must proceed.

### **Public Participation Process**

- n) The following information must be submitted with the final BAR:
- (i) A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended;
  - (ii) Copies of all comments received during the draft BAR comment period; and
  - (iii) A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the draft BAR. Please note that comments received from this Department must also form part of the comment and response report.
- o) Please ensure that all issues raised and comments received during the circulation of the draft BAR 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 BAR.



- p) Proof of correspondence with the various stakeholders must be included in the final BAR. 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.

#### **Environmental Management Programme**

- q) It is noted that the compulsory generic Environmental Management Programme (EMPr), contemplated in Regulations 19(4) for overhead electricity transmission and distribution infrastructure, where such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, has been included in the BAR. Please ensure that the generic EMPr includes the expertise of the EAP to prepare an EMPr, including a curriculum vitae.
- r) It is noted that the generic EMPr states that audit reports are to be submitted to the Competent Authority at a frequency determined by the EA, however, please recommend a suitable frequency for submission of environmental audit reports to the Department. This may be done in the comments and response report, in response to this comment.

#### **Environmental Impact Statement**

- s) It is noted that an environmental impact statement is included in the draft BAR, however you are kindly requested to expand the impact statement to include the following –
- (i) a summary of the key findings of the environmental impact assessment;
  - (ii) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and
  - (iii) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.

Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.

You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *"Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority - (a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have 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."*

Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended, which states: *"the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days"*.

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

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 Environment, Forestry and Fisheries**

**Signed by: Ms Sindiswa Dlomo**

**Designation: Deputy Director: National Infrastructure Projects**

**Date: 01/10/2020**

cc:	Richard Gordon	Gunstfontein Wind Farm (Pty) Ltd	E-mail: stephnie.kot@aced.co.za
	Bryan Fisher	NC DENC	E-mail: Bfisher@ncpg.gov.za
	JJ Fortuin	Karoo Hoogland Local Municipality	E-mail: munman@karoohoogland.gov.za

DEFF

Biodiversity Conservation Unit



## environment, forestry & fisheries

Department: Environment, Forestry  
and Fisheries  
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: + 27 86 625 1042

**Reference:** Gunstfontein powerline

**Enquiries:** Ms Portia Makitla

**Telephone:** 012 399 9411 **E-mail:** [pmakitla@environment.gov.za](mailto:pmakitla@environment.gov.za)

Ms Nicolene Venter  
Savannah Environmental  
PO Box 148  
**SUNNINGHILL**  
**2147**

Telephone Number: +27 (11) 656 3237

Email Address: [publicparticipation@savannahsa.com](mailto:publicparticipation@savannahsa.com)

### PER E-MAIL

Dear Ms Venter

### **DRAFT BASIC ASSESSMENT REPORT COMMENTS FOR THE PROPOSED GRID CONNECTION EXTENSION INFRASTRUCTURE FOR THE GUNSTFONTEIN WIND FARM, NORTHERN CAPE PROVINCE**

The Directorate: Biodiversity Conservation reviewed and evaluated the aforementioned draft report. Based on the information provided in the specialist report, the proposed extension of the grid connection is for the authorised Gunstfontein Wind Farm and the Gunstfontein Grid Connection. The project development site is located within the Komsberg Renewable Energy Development Zone (REDZ) and within the Central corridor of the Strategic Transmission Corridors. From a regional perspective, this area is considered favourable for the development of the proposed grid connection extension infrastructure. There are no known Important Bird Areas (IBAs) or wetlands of significant avifaunal importance within the vicinity (<50km) of the proposed grid development.

In Overall, there are no potential impacts associated with the proposed development that are considered to be of high significance and which cannot be mitigated to an acceptable level. As such, there are no fatal flaws or other major impediments that should prevent the development from going ahead.



**Batho pele-** putting people first

**DRAFT BASIC ASSESSMENT REPORT COMMENTS FOR THE PROPOSED GRID CONNECTION  
EXTENSION INFRASTRUCTURE FOR THE GUNSTFONTEIN WIND FARM, NORTHERN CAPE  
PROVINCE**

In order to minimize the negative impacts that might occur as a result of the proposed development, the following recommendation must be considered:

- Suitable bird repelling structures and bird diverters must be considered to avoid collision of birds with the power lines;
- Areas with large trees must be avoided as they serve as potential roosting and breeding habitat for a variety of birds, including raptors;
- A specialist must be appointed to search and identify any active breeding site on site and if found must be demarcated as a NO-GO Zone and monitored during construction;
- All disturbed, exposed earth and cleared areas must be rehabilitated with indigenous perennial shrubs and grasses from the local area;
- Permits from relevant authorities must be obtained prior commencement of any construction activities for the removal or disturbance of any TOPs, Red Data listed or Provincially protected species;
- Sensitive areas in close proximity to the development footprint must be demarcated as no-go area i.e. drainage lines; and
- Erosion and Alien Plant Species Management Plan, and Rehabilitation Plan must be submitted as part of the final report to mitigate on habitat degradation due to erosion and alien plant invasion.

Lastly; the final report must also comply with all the requirements as outlined in the EIA guideline for renewable energy projects and the Revised Best Practice Guideline for Birds & Wind Energy for assessing and monitoring the impact of wind energy facilities on birds in Southern Africa.

Yours faithfully



**Mr. Seoka Lekota**  
**Control Biodiversity Officer Grade B: Biodiversity Conservation**  
**Department of Environment, Forestry & Fisheries**  
**Date: 05/10/2020**

SAHRA



an agency of the  
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Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 15175

Date: Friday November 20, 2020  
Page No: 1

## **Final Comment**

**In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Savannah Environmental (Pty) Ltd

PO Box 148  
Sunninghill  
2157

**Gunstfontein Wind Farm (Pty) Ltd proposes the construction and operation of a grid connection solution, known as the “grid extension infrastructure” for the authorised Gunstfontein Wind Farm (DEA Ref: 14/12/16/3/3/2/826), near Sutherland, Northern Cape Province. The grid connection solution will include the development of a double-circuit 132kV overhead power line (known as the Gunstfontein 132kV OHL extension double-circuit power line) to connect the Gunstfontein Wind Farm to the national grid, via the Hidden Valley substation. The proposed 132kV OHL extension will be an extension of the already authorised Gunstfontein Grid Connection (14/12/16/3/3/1/1619). Other associated infrastructure will also be required for the grid connection solution, such as access tracks/roads and laydown areas. A corridor 300m wide and approximately 7.5km long along with an assessment zone of 200m around the starting and terminating substation boundaries (collectively known as the grid corridor) is being assessed to allow for the optimisation of the grid (i.e. eventual micro siting) and associated infrastructure and to accommodate environmental sensitivities and other energy infrastructure currently under construction on the properties. It must be noted that the assessed corridor route is located directly adjacent and parallel to the approved Soetwater power line routing (this powerline connects the Heuwels and Hidden Valley substations, and is currently under construction by Soetwater and Karusa Wind Farms respectively). The proposed development consists of: A double-circuit 132kV overhead power line (known as the Gunstfontein 132kV OHL extension double-circuit power line); and Associated infrastructure: Laydown areas. Access and service tracks. A corridor 300m wide and approximately 7.5km long as well as a 200m wide assessment zone around each of the two substations is being assessed to allow for the optimisation of the grid and associated infrastructure and to accommodate environmental sensitivities. The grid infrastructure (including the power line and associated infrastructure) will be developed within the assessed 300m wide corridor and a 200m assessment zone around each of the substations (known as the grid connection infrastructure). The grid connection infrastructure will be located within a grid connection corridor located directly parallel and approximately 15m west of the authorised Soetwater WEF power line**

# Proposed Grid connection extension infrastructure for the Gunsfontein Wind Farm, Northern Cape.

Our Ref: 15175



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Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
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**routing. The height of the power line towers of the 132kV double-circuit power line will be up to 32m and the servitude width of the power line will be up to 40m. The entire extent of the corridor proposed for the development is located within the Komsberg Renewable Energy Development Zone (REDZ) and within the central corridor of the Strategic Transmission Corridors. Access to the grid connection corridor is possible via numerous existing smaller farm roads in close vicinity to the corridor, primarily off the Regional 354 (R354) tarred road running between Matjiesfontein and Sutherland towns. Apart from these existing roads, the authorised Gunstfontein 132kV powerline provides for an access/service track along its length that can also be used to access the corridor. In addition, existing access roads to the Huewels and Hidden Valley substations (currently under construction) will be used to access the start- and end- point of the OHL extension. Formal roads will not be constructed underneath the power line for maintenance purposes, but rather access for maintenance purposes will be limited to jeep tracks running along the length of the line. Where possible, the existing service track for the Soetwater powerline will be utilised.**

Savannah Environmental (Pty) Ltd has been appointed by Gunstfontein Wind Farm (Pty) Ltd to conduct an Environmental Authorisation (EA) Application process to extend the authorised Gunstfontein Grid Connection powerline to the authorised Gunstfontein Wind Farm, near Sutherland, Northern Cape Province

A draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed extension of the powerline will include the construction of a 7.5 km single or double circuit 132KV overhead powerline, laydown areas and access and service tracks. It must be noted that while the DBAR notes that the Public Review period is from the 4<sup>th</sup> September 2020 to the 5<sup>th</sup> October 2020, the DBAR and appendices was only submitted to SAHRA on the 22<sup>nd</sup> October 2020. Therefore, in terms of the NEMA EIA timeframes, SAHRA has until the 21<sup>st</sup> November 2020 to provide comments.

It must be noted that the Gunstfontein Grid Connection application (DEFF Ref: 14/12/16/3/3/1/1619) was never submitted to SAHRA for comment, however the current powerline extension is located within the authorised Soetwater Powerline servitude, which has been commented on by SAHRA (see SAHRIS Case ID 8657 <https://sahris.sahra.org.za/cases/soetwater-facility-substation-complex-and-ancillaries-0> and SAHRIS Case ID 8658: <https://sahris.sahra.org.za/cases/soetwater-switching-station-ancillaries-power-line>). SAHRA had no objections to the proposed development and provided conditions for the development.

CTS Heritage has been appointed to provide heritage specialist input as part of the EA Amendment application report as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National



# Proposed Grid connection extension infrastructure for the Gunsfontein Wind Farm, Northern Cape.

Our Ref: 15175



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Heritage Resources Act, Act 25 of 1999 (NHRA).

*Lavin, J. 2020. Proposed Grid connection extension infrastructure for the Gunsfontein Wind Farm, Northern Cape*

No heritage resources were previously identified within the proposed grid extension route.

Recommendations provided in the report include the following:

- If concentrations of historical and pre-colonial archaeological heritage material and/or human remains (including graves and burials) are uncovered during construction, all work in the vicinity must cease immediately and be reported to the South African Heritage Resources Agency (SAHRA) so that systematic and professional investigation/excavation can be undertaken. Phase 2 mitigation in the form of test-pitting/sampling or systematic excavations and collections of the pre-colonial shell middens and associated artefacts will then be conducted to establish the contextual status of the sites and possibly remove the archaeological deposit before development activities continue;
- A person must be trained as a site monitor to report any archaeological sites found during the development. Construction managers/foremen and/or the Environmental Control Officer (ECO) should be informed before construction starts on the possible types of heritage sites and cultural material they may encounter and the procedures to follow when they find sites;
- Should substantial fossil remains such as vertebrate bones and teeth, plant-rich fossil lenses, fossil wood or dense fossil burrow assemblages be exposed during construction, the responsible ECO/EO/Environmental Representative should safeguard these, preferably in situ, and alert SAHRA, i.e. The South African Heritage Resources Authority, as soon as possible (Contact details: Mr P. Hine P.O. Box 4637, Cape Town 8000. Tel: 021 462 4502. Email: [phine@sahra.org.za](mailto:phine@sahra.org.za)) so that appropriate action can be taken by a professional palaeontologist, at the Proponent's expense. Mitigation would normally involve the scientific recording and judicious sampling or collection of fossil material as well as associated geological data (e.g. stratigraphy, sedimentology, taphonomy) by a suitably qualified palaeontologist.

## Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the

# Proposed Grid connection extension infrastructure for the Gunsfontein Wind Farm, Northern Cape.

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## Final BAR and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed amendment to the authorised development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development;
- 38(4)c(i) – 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;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 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;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
  - i) 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 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;
  - The Final BAR and EMPr must be submitted to SAHRA for record purposes;
  - The decision regarding the EA Amendment Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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

Yours faithfully

**Proposed Grid connection extension infrastructure for the Gunsfontein Wind Farm, Northern Cape.**

**Our Ref: 15175**



an agency of the  
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Natasha Higgitt  
Heritage Officer  
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: <http://www.sahra.org.za/node/537577>

**Terms & Conditions:**

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.

SARAO

Savannah Environmental Pty (Ltd)  
First Floor, Block 2  
5 Woodlands Drive Office Park  
Cnr Woodlands Drive & Western Service Road  
Woodmead  
2191

Email: [info@savannahsa.com](mailto:info@savannahsa.com)  
cc: [nicolene@savannahsa.com](mailto:nicolene@savannahsa.com)

Date: 15 October 2020

To whom it may concern

**RE: BASIC ASSESSMENT REPORT FOR GUNSTFONTEIN WIND FARM GRID CONNECTION INFRASTRUCTURE**

SARAO has completed the preliminary risk re-assessment with regard to the electromagnetic emissions of the for the above mentioned project and its possible impact on the SKA radio telescope.

This project will pose a low risk of interference to the SKA and therefore, SARAO does not object to the development of the project.

Thank you for your patience and our office remains open for any discussion relating to this project and its impact on the SKA radio telescope.

Regards,



Mr Selaelo Matlhane  
Spectrum & Telecommunication Manager  
South African Radio Astronomy Observatory (SARAO)  
Tel: 011 442 2434  
Email: [smatlhane@ska.ac.za](mailto:smatlhane@ska.ac.za)

[www.ska.ac.za](http://www.ska.ac.za)

The South African Radio Astronomy Observatory (SARAO) is a National Facility managed by the National Research Foundation and incorporates all national radio astronomy telescopes and programmes. SARAO is responsible for implementing the Square Kilometre Array (SKA) in South Africa.