

Comments Received

BirdLife

24 July 2020

Ronald Baloyi  
Savannah Environmental  
By email: [ronald@savannahsa.com](mailto:ronald@savannahsa.com)>

Dear Ronald

**RE: Background Information Document for the proposed Geelstert 1 and Geelstert 2 Solar PV Facilities and Geelstert Grid Connection, Near Aggeneys, Northern Cape Province**

Thank you for the opportunity to comment on the above proposed developments.

While BirdLife South Africa supports the responsible development of renewable energy, we are concerned that the proposed infrastructure lies adjacent to an Important Bird and Biodiversity Area and may infringe on habitat Red Lark - a threatened species with a very restricted range. The proposed site falls within the Koa Dunes ecosystem and is within the core stronghold of the species. The densities of Red Lark are the highest in this core Koa area (0.03 adult birds/ha), compared to the core Loeriesfontein area (0.014) and other areas surrounding these (0.003 – 0.01) (Colyn et al 2020 *in prep*). We are therefore pleased to note that an avifaunal impact assessment will be undertaken.

The maps below show the results of a habitat suitability model for Red Lark in the area (Colyn et al 2020 *in prep*) – warm areas indicate a higher probability of suitable habitat. We suggest that the output of this model should be used in combination with the results of the avifaunal surveys to guide the location of infrastructure, including fences and roads.

BirdLife South Africa will not support the loss or degradation of the red dune habitat and urge that consideration be given to measures that will help secure the long-term protection of this important habitat as this assessment proceeds.

Thank you for taking the time to consider our input.

Yours sincerely

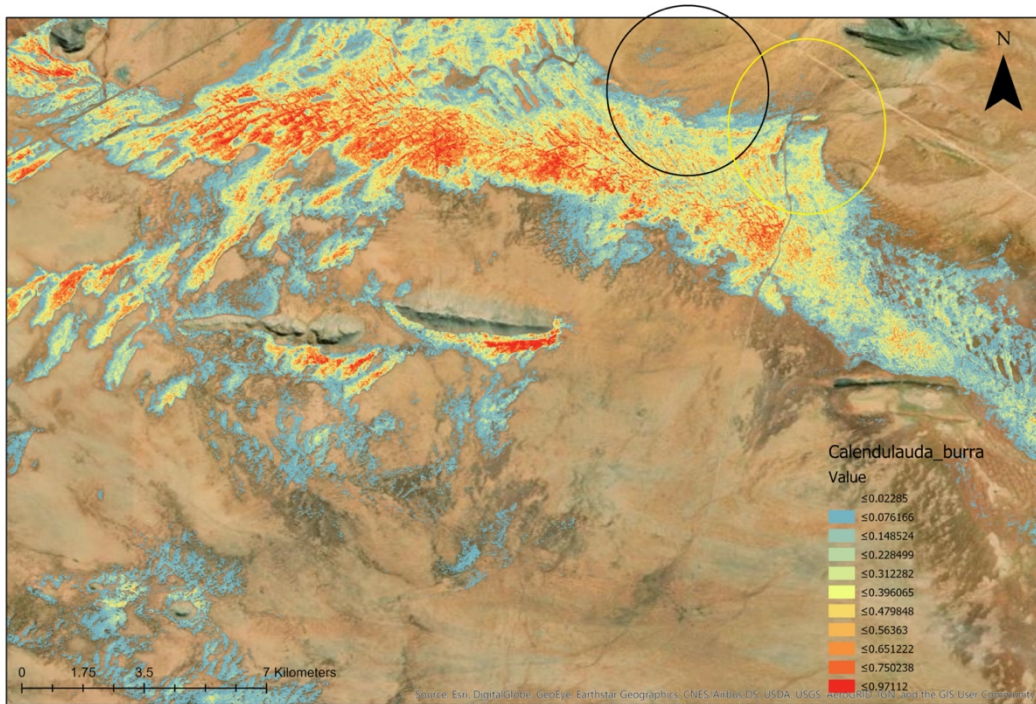


Samantha Ralston-Paton  
Birds and Renewable Energy Project Manager.

BirdLife South Africa is a partner of BirdLife International, a global partnership of nature conservation organisations. Member of IUCN (International Union for Conservation of Nature).

Reg No: 001 – 298 NPO

PBO Exemption No: 930004518



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: 14/12/16/3/3/1/2221

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## PER MAIL / E-MAIL

Dear Ms Thomas

### **COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED GEELSTERT 1, A SOLAR PV FACILITY AND ASSOCIATED INFRASTRUCTURE PROPOSED ON A SITE NEAR AGGENEYS AND WITHIN THE SPRINGBOK RENEWABLE ENERGY DEVELOPMENT ZONE (REDZ), IN THE NORTHERN CAPE PROVINCE**

The draft Basic Assessment Report (BAR) dated August 2020 and received by this Department on 20 August 2020, refer.

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

- 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.
- c) 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 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) Ensure that the layout map indicates all supporting onsite infrastructure e.g. roads (existing and proposed);
- e) The location of sensitive environmental features on site e.g. CBAs, heritage sites, drainage lines etc. that will be affected. The map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure.
- f) Signed Specialist Declaration of Interest forms must be attached to the final BAR for each specialist study conducted.
- g) Please ensure that the BAR includes an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 1(3)(r) of the NEMA EIA Regulations, 2014, as amended, which states that the BAR must include:
  - (i) "an undertaking under oath or affirmation by the EAP in relation to:
  - (ii) the correctness of the information provided in the reports;
  - (iii) the inclusion of comments and inputs from stakeholders and I&APs;

- (iv) the inclusion of inputs and recommendations from the specialist reports where relevant; and  
(v) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties”.
- h) Copies of all comments received during the draft BAR comment period; and 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.
- i) 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.
- j) 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.
- k) You are further reminded that the final BAR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of basic assessment reports and EMPr in accordance with Appendix 1, Appendix 4 and Regulation 19(1) (a) of the Environmental Impact Assessment Regulations (2014), as amended.
- l) 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.

### **General**

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: 22/09/2020**

CC:	Robert Wagener	Geelster Solar Facility 1 (Pty) Ltd	E-mail: Robert.wagener@abo-wind.com
	Bryan Fisher	NC: DENC	E-mail: Bfisher@ncpg.gov.za
	Edward Vries	Khai-Ma Local Municipality	E-mail: Mmsecretary@khaima.gov.za



DEFF

Biodiversity Conservation



## environment, forestry & fisheries

Department: Environment, Forestry  
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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:** Geelstert Solar Facility 1, 2 & Grid Connection

**Enquiries:** Mr Seoka Lekota

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### PER E-MAIL

Dear Ms. Venter

### **DRAFT BASIC ASSESSMENT REPORT FOR GEELSTERT 1 AND 2 SOLAR PV FACILITY AND ASSOCIATED INFRASTRUCTURE (GRID CONNECTION) PROPOSED ON A SITE NEAR AGGENEYS AND WITHIN THE SPRINGBOK RENEWABLE ENERGY DEVELOPMENT ZONE (REDZ), IN THE 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 development falls within Renewable Energy Development Zone (Springbok REDZ) which is an area identified as highly suitable for the development of a solar energy facilities. Furthermore, it was noted that site is located near an Important Bird Area (IBA) known as Haramoep and Black Mountain Mine and this IBA provide protection to the globally threatened Red Lark.

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. However, the potential for cumulative impact in the area is however a concern given the large number of different proposed renewable energy developments in the area.

Notwithstanding the above, the following recommendation must be considered in the final report:

- Search and rescue plan for the identified Species of Conservation Concern (SCC) must be submitted as part of the final report;
- An ecologist must be appointed to perform a final walkthrough prior to finalisation of the final phase of the EIA, to identify all sensitive plant species and assist in identifying the areas that require protection;
- The breeding site of a Verreaux's Eagle, Martial Eagle and Ludwig's Bustard on site must be demarcated as a NO-GO Zone; and
- The Avifaunal specialist must determine the final pylon positions prior to construction and where bird flight diverters are required and the installation of power line pylons must be away from ecological sensitive systems,
- All protected fauna and flora species of conservation concern must not be disturbed or removed prior to permit approval from relevant National and Provincial authorities.

The final report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Revised Best Practice Guideline for Birds & Solar Energy for assessing and monitoring the impact of solar power generating facilities on birds in Southern Africa.

Yours faithfully



**Mr Seoka Lekota**  
**Control Biodiversity Officer Grade B: Biodiversity Conservation**  
**Department of Environment, Forestry & Fisheries**  
**Date: 01 October 2020**

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Department:  
Environment & Nature Conservation  
NORTHERN CAPE PROVINCE  
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Reference : Geelstert PV1  
Tshupelo : Geelstert PV 2  
Isalathiso : Geelstert Grid Connection  
Verwysing :

Date :  
Leshupelo :  
Umhla : 21 September 2020  
Datum :

Mr Sabelo Malaza  
Chief Director: Integrated Environmental Authorizations  
Department of Environmental Affairs  
Private Bag X447  
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0001

Attention: Mr Ephron Maradwa, EMaradwa@environment.gov.za (Please also forward a copy to the EAP, Nicolene Venter on behalf of savannah environmental (publicprocess@savannah.com).

Dear Mr Sabelo Malaza

**RE: Draft Basic Assessment Reports for Geelstert 1 and Geelstert 2 Solar PV facilities and Geelstert Grid Connection near Aggeneys, Northern Cape Province.**

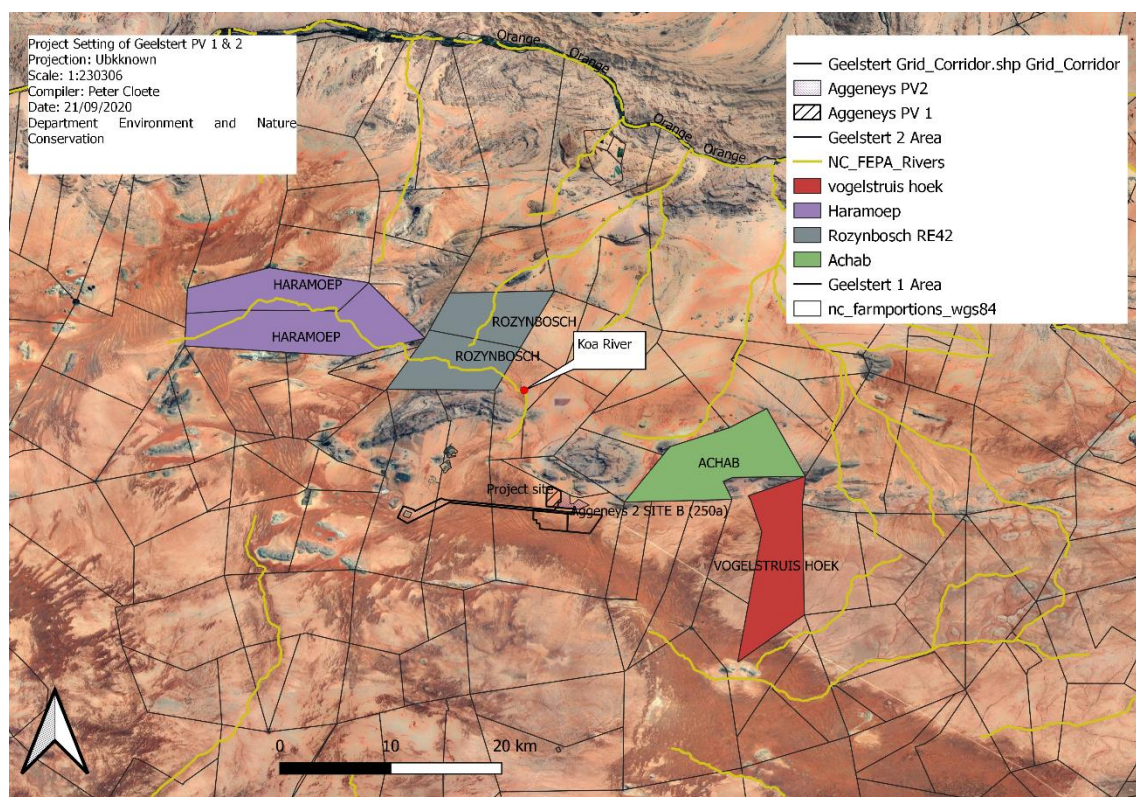
In order to ensure that there is sufficient information for an informed decision to be made, please address the necessary ecological issues as outlined in the letter. Please note that the comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.

**Background**

The development of two separate solar photovoltaic (PV) facilities, each with a contracted capacity of up to 125MW, and associated grid connection is proposed on a site located approximately 11km south-east of the town of Aggeneys in the Northern Cape Province. The two solar PV facilities are to be known as Geelstert 1 and Geelstert 2. The grid connection solution will be known as Geelstert Grid Connection. The two proposed solar PV facilities

are located on the Remaining Extent of the Farm Bloemhoek 61 and will be connected to the Aggeneys Main Transmission Substation (MTS). The grid connection will include a collector substation and a double-circuit power line of up to 220kV. The recently approved Aggeneys PV1 and Pv2 facilities and associated Grid Connection are located to the north on the same property and will be bid under future Department of Mineral Resources and Energy's REIPPP Programme(s) (Figure 1). It is important to note that portions of the neighbouring farms Rozynbosch, Achab and Vogelstruishoek have been formally set aside as biodiversity offsets by Black Mountain Mine for the Gamsberg project, or are managed as nature reserves contributing to biodiversity targets in this landscape. The farm Haramoep has also been negotiated as a potential offset property.

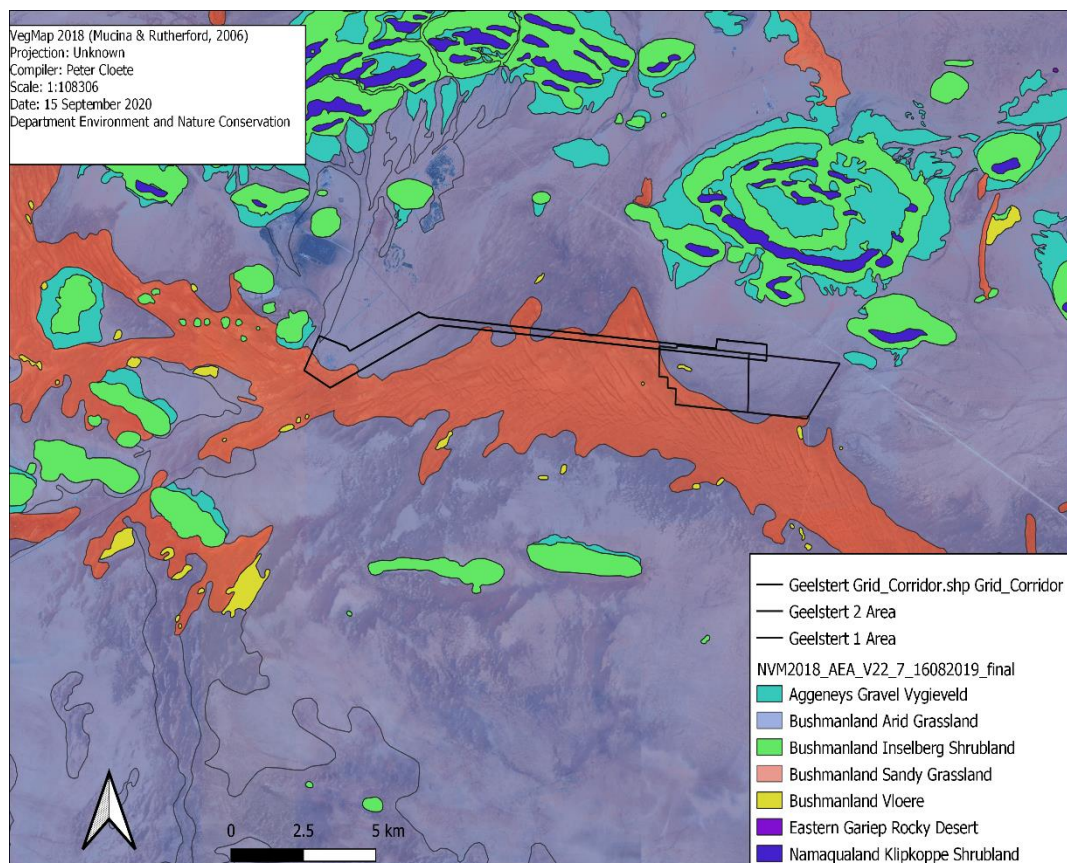
The Nature Reserves are protected by 5km buffers thus, PA domains and buffers do apply here and not otherwise as stated by the specialist (see page 43, Bushmanland PV's Ecological Report) (credit: Enrico Oosthuysen).



**Figure 1:** Location of Geelstert PV 1 & PV 2, in relation to, Gamsberg Mountain and Aggeneys PV & 2 to the north

**Herewith the comments for the proposed developments:**

1. The ecological specialist study was conducted for a PV solar development. If another solar technology should be decided upon, depending on the specific technology, the environmental impacts may differ.
2. The cumulative impacts of the other developments (e.g. mining as well as other solar developments) in the surroundings must be considered in the study. Not to say that the applicants needs to take responsibility for other developers but to assess the impacts of the proposed development on ecosystem function and specific vegetation units and/or protected species on a local and regional scale. According to the Vegetation Map of South Africa the vegetation in the study area includes Bushmanland Arid Grassland, Bushmanland Sandy Grassland and Bushmanland Vloere.



3. **Figure 2:** Broad-scale overview of the vegetation in and around Geelstert 1. The vegetation map is an extract of the 2018 national vegetation map VegMap (Mucina & Rutherford 2006).

4. Major changes have however occurred thus far as these vegetation units are under severe constraint due to agricultural activities (overgrazing, etc.), recent renewable energy developments and the recent drought. Yet only 0.4% of Bushmanland Arid Grassland vegetation unit is formally protected (though conservation land in the vegetation unit has been added up to 2006) and it has a conservation target of 21%

As the vegetation types occurring on site are known to contain numerous Species of Conservation Concern, a detailed survey must be undertaken by the botanical specialist during the peak flowering season to ensure that important plant populations are not affected by the development proposal. All indigenous protected species listed in Schedule 1, 2 and 3 respectively, in terms of the Northern Cape Nature Conservation Act (Act No. 9 of 2009) may not be picked, damaged, destroyed or removed without relevant permits, which must be obtained from the DENC. A similar assessment is required for fauna.

5. One aspect that requires vigorous assessment is that there are threatened [Red Lark (*Calendulauda burra*); Scatlers` s Lark (*Spizorys sclaterii*)] bird species that occur largely on the undulating red dunes. Red Larks occur in the Koa River valley which contains undulating red dunes. The red dunes are perceived to be at reduced threat from development, as is stated in the report. *“This is? considered to be a sensitive habitat that is not suitable for development, firstly due to the general sensitivity of the habitat to disturbance and secondly as this is known habitat the Red Lark”*

However, it is recommended that the long-term conservation and persistence of these species over its range needs to be considered in the assessment and integrated into the management of the site. This is a general species and ecosystem principle that must be considered in the assessment. More detail is required in this regard for the Final BAR.



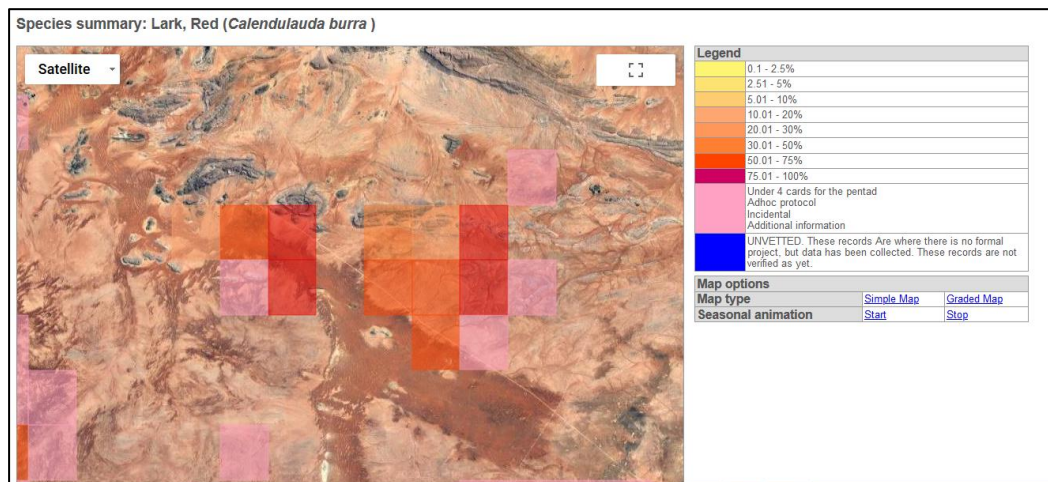
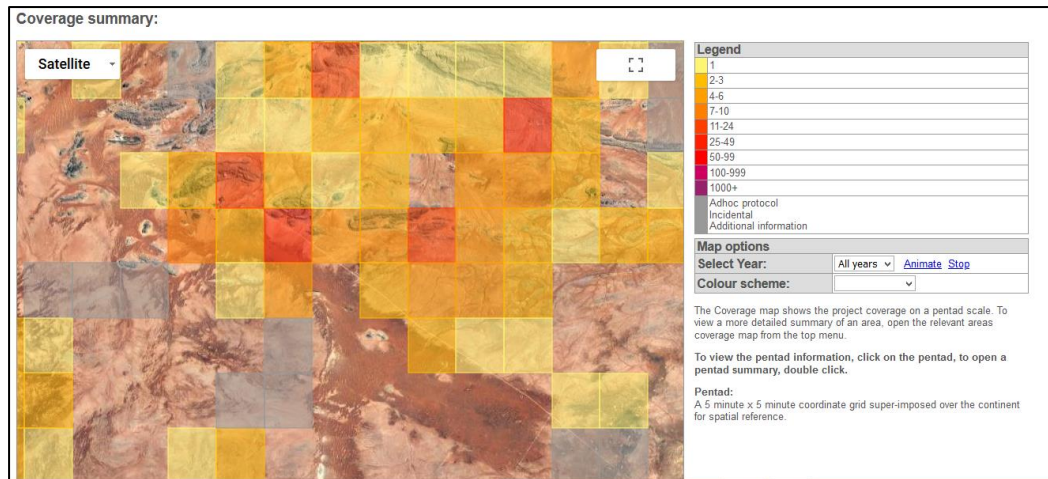


Figure x (Top) South African Bird Atlas Project 2 Records for the region indicating number of cards / surveys completed; (Bottom) SABAP2 Red Lark observations for the same region indicating observation frequency. Note the information gap for the red dune systems. (source: <http://sabap2.birdmap.africa/species/479>, accessed 18 September 2020)

Desert species in the region are expected to come under pressure from climate change (Kemp et al. 2020; Kemp & McKechnie, 2019) with development pressures potentially increasing survival risk.

Appropriate buffers must be determined for sensitive areas in the surrounding vicinity to avoid impact on these habitats and particular attention should be paid to avoiding the loss of intact habitat, maximizing connectivity at a landscape scale. Also note that a “low sensitivity” area does not necessarily mean that an area is not important for biodiversity conservation.

Selected remaining areas of natural vegetation and habitat have been designated as either. Critical Biodiversity Areas or Ecological Support Areas,

being habitat required as part of the CBA conservation network. In addition to Other Natural Areas Figure 3 shows the proposed linear development traverse large sections of the Critical Biodiversity Area 2 network, selected for various criteria. The majority of the proposed Geelstert PV1 and PV2 Laydown areas are within Ecological Support Areas. According to the Ecological Assessment: *“The development area lies within an Ecological Support Area, which are generally areas identified as important buffer areas for CBAs or which may be important for ecological processes such as landscape connectivity.”* Based on the desktop spatial results the proposed development area has an overall moderate sensitivity, the western and south western portion of the area have the highest sensitivity ratings. All CBA`s surrounding the development area should thus be considered essential for meeting targets for both ecosystem types as well as ecological connectivity. It is recommended that the ecological evaluation be completed by detailed description of flora occurring at each infrastructure position so that this can further inform a site and habitat specific EMP. Protected plant species that may be removed can be applied for a plant rescue permit / removal permit from the DENC.

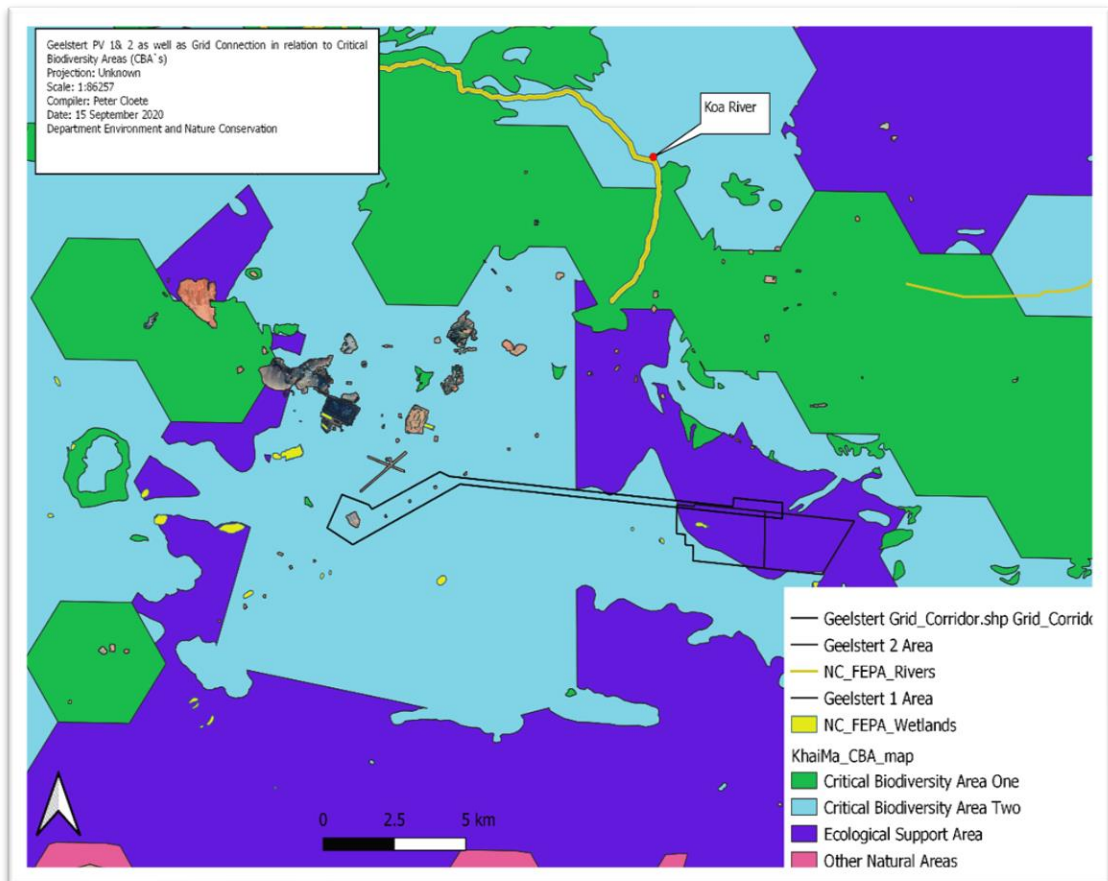
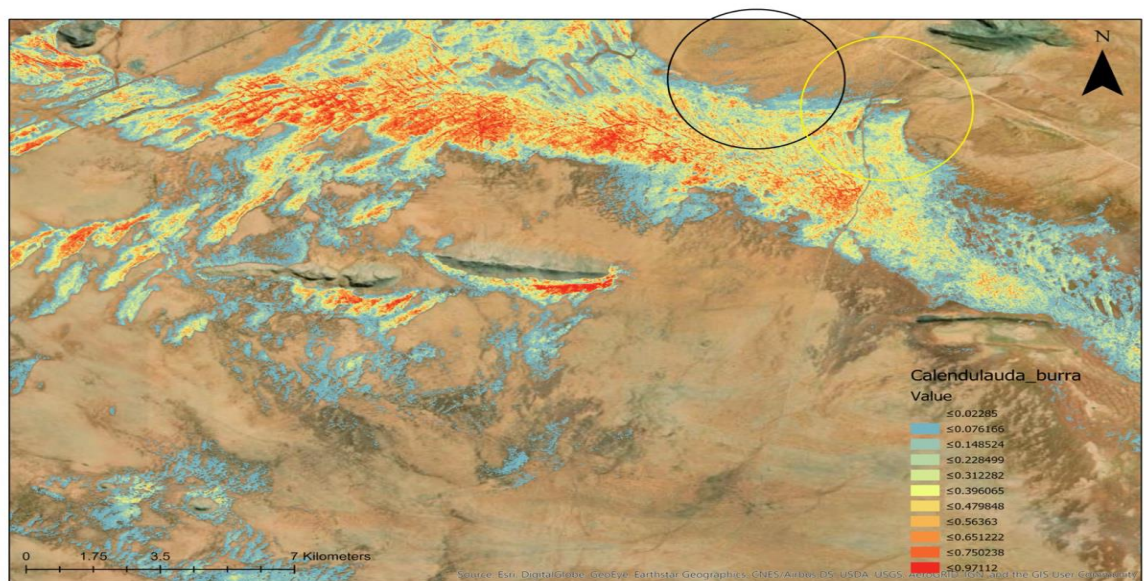


Figure 3: Extract of the Northern Cape Critical Biodiversity Areas map for the study area, showing that the site falls within an ESA but does not impact any CBAs.

Specialist studies have already highlighted several areas within the application area that are considered to have high conservation value. These include:

The Haramoep and Black Mountain Mine Conservation Area Important Bird Area can be found directly adjacent to the proposed Geelster PV 1 & 2 infrastructure. Desktop studies are inherently part of specialist inputs, but must be accompanied by field-based surveys especially with impacts on NFEPA's and CBA's. The proposed site falls within the Koa Dunes ecosystem. The densities of the Red Lark and Scatlers's Lark are the highest in this core Koa area (0.03 adult birds/ha), compared to the core Loeriesfontein area (0.014) and other areas surrounding these (0.003 – 0.01) (Colyn *et al.* 2020 in prep). The recommendations of BirdLife dated in letter 24 July 2020, as part of the comments recieved are supported. The maps below show the results of a habitat

suitability model for Red Lark in the area (Colyn et al 2020in prep) –areas indicate a higher probability of suitable habitat.



We suggest that the output of this model should be used in combination with the results of the general avifaunal surveys to guide the location of infrastructure, including fences and roads.

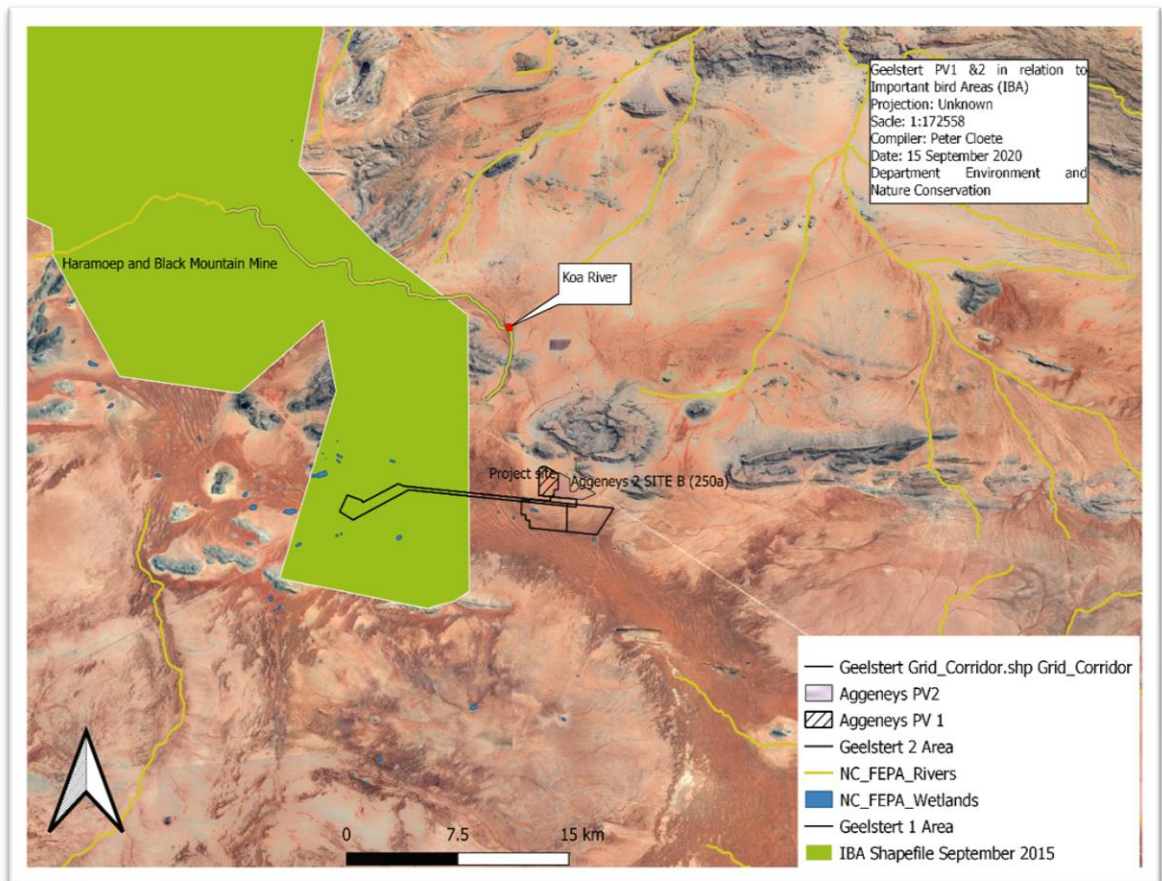


Figure 4: Sensitivity map for the Geelstert 2 development area and immediate surroundings.

The “*Bushmanland Vloere*” mapped in the study area are valuable ecological corridors and provide keystone biophysical processes.

Rocky outcrops are important habitat for several vertebrates, including lizards (which is Red Data Book listed).

The National Freshwater Ecosystem Priority Areas (“NEFPA”) project has identified strategic spatial priorities for conserving South Africa’s freshwater ecosystem and supporting sustainable use of water resources. According to the Biodiversity Report.....” *No true FEPA rivers are found in the study area*”. It is important to note that there are wetlands mapped as NEFPA Rivers within the proposed development site (Figure 4). Measures to prevent excessive disturbance during development within wetlands or ephemeral pans, need to be

assessed. Please contextualise the assessment i.t.o. the published National Freshwater Ecosystem Priority Areas map, available at <http://bgis.sanbi.org>. Water is a vulnerable resource in the Northern Cape. Demand issues such as increased water use, peak use, seasonal variability, poor water use planning, poor conservation and water losses have in the past contributed to water shortages in the Northern Cape (Mukheibir, 2007). It is recommended that the applicant obtains confirmation from the Pella Drift Water Board, whether it is capable to supply the project with the required amount of water during each phase of the project.

The calculated amount of water use for cleaning of the panels should be elaborated upon, specifying e.g. the estimated amount of water used per panel, expected number of times panels will be cleaned per year etc. Will the water used for cleaning solar panels be treated, re-used or recycled? Clarity is needed on the management of waste water. This information will inform the water use license application. Clarity is needed on the chemicals used for dust suppression. The proponent is thus advised to put measures in place to control chemically treated water for dust suppression during the construction phase.

#### Layouts and road networks

Roads routes still require finalisation. In addition, more information is required on the type of upgrades and widening of roads that will be required to accommodate large trucks and heavy machinery. The proposed footprints are to be required as part of this application process.

#### Air pollution

In addition to assessment of potential air pollution from the prospecting site, risk of pollution from windblown pollutants during construction needs quantification.

## Rehabilitation

The timeframe for rehabilitation to occur after development have commenced should be specified. Many plants species seed banks do not remain viable within the topsoil for such a long time period or may be lost. In addition, disturbed areas and stockpiled topsoil is prone to invasion by alien plants and pioneer species.

### General:

Cumulative impacts of developments (including prospecting rights, mining and renewable energy) are of high concern in the region, and is very notable around Aggeneys. There is an escalating number of both mining and energy applications and with additional infrastructure (e.g. roads, electric power lines), the area is likely to become more attractive to both activities. Cumulative impacts cannot be allowed to expand endlessly unless formal conserving areas within and surrounding developments are also considered. Biodiversity Offsets (within and outside of development areas) need to be considered now whilst there are still some limited options to meet the necessary conservation targets. These conservation efforts must be reconciled with the provincial protected area expansion strategy and focus areas, where landscape connectivity and ecosystem functionality are pursued.

The ecological specialist study should also be updated to refer to the updated 2018 South African Vegetation Map. List of species provided at quarter degree grid scale are not meaningful on its own. Lists of species (plants and animals) seen on site should be provided and where surveys could not be conducted this should be explained and motivated.

The Northern Cape Nature Conservation Act (Act No. 9 of 2009) and all regulations in terms of the Act and all other relevant legislation must be adhered to. It is the applicant's responsibility to adhere to any other relevant legislation.

We hope you find these recommendations in order

Yours sincerely



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Mr. C Geldenhuys

Acting Scientific Manager: Research and Development Support Unit

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Date: 21/9/2020



ESKOM

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 Transmission Division: Land & Rights  
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SAHRA



an agency of the  
Department of Arts and Culture

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Enquiries: Natasha Higgitt  
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Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 15332

Date: Monday August 17, 2020  
Page No: 1

## Interim Comment

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

Attention: Geelstert Solar Facility 1 (Pty) Ltd

**The development of two (2) separate solar photovoltaic (PV) facilities, each with a contracted capacity of up to 125MW. The facilities will be connected to the Aggeneis MTS via a collector substation and an overhead power line with capacity of up to 200kV.**

Thank you for notifying SAHRA of the Environmental Authorisation (EA) application for a proposed Solar PV facility (Geelstert 1) and supporting infrastructure near Aggeneys, Northern Cape Province.

As the proposed development is undergoing an EA Application process in terms of the National Environmental Management Act, 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations as amended, it is incumbent on the developer to ensure that a **Heritage Impact Assessment (HIA)** is done as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 24(4)b(iii) of NEMA. This must include an archaeological component, palaeontological component and any other applicable heritage components. The HIA must be conducted **as part of the EA Application** in terms of NEMA and the NEMA EIA Regulations.

SAHRA requests that an assessment of the impacts to heritage resources that complies with section 38(3) of the NHRA as required by section 38(8) of the NHRA and section 24(4)b(iii) of NEMA be conducted as part of the EA process.

The assessment must include an assessment of the impact to archaeological and palaeontological resources. The assessment of archaeological resources must be conducted by a qualified archaeologist and the report comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports (see [www.asapa.co.za](http://www.asapa.co.za) or [www.aphp.org.za](http://www.aphp.org.za) for a list of qualified archaeologists).

The proposed development is located within an area of low Palaeontological Sensitivity as per the SAHRIS PalaeoSensitivity map. As such, a Chance Fossil Finds Procedure must be developed as part of the EMP for the development (see <https://www.palaeosa.org/heritage-practitioners.html> for a list of qualified palaeontologists).

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Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

Further comments will be issued upon receipt of the NEMA EA documents inclusive of appendices.

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: <http://www.sahra.org.za/node/538562>

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CaseID: 15395

Date: Tuesday October 13, 2020  
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## Final Comment

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

Attention: ABO Wind Renewable Energies (Pty) Ltd

#### **The development of a grid connection infrastructure to connect the proposed Geelstert 1 and Geelstert 2 solar PV facilities to Aggeneis Main Transmission, Northern Cape Province.**

Savannah Environmental (Pty) Ltd has been appointed by ABO Wind Renewable Energies (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Geelstert Grid Connection, near Aggeneys, 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 infrastructure will include a double-circuit power line (up to 220kV in capacity) and a single circuit powerline (up to 220kV in capacity). A corridor of 17.5 km long and 1 km wide has been assessed. Associated infrastructure will include a new collector substation with a development footprint of 1.25 ha and a new 6 m wide access road.

CTS Heritage have been appointed to provide heritage specialist input as part of the BAR process as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). It is noted that the proposed development is located within an area of low sensitivity for palaeontological resources as per the SAHRIS PalaeoSensitivity map, and therefore no further assessment of the impact to palaeontological resources is required.

*Lavin, J. 2020. Heritage Screener: Proposed Development of a grid connection for the proposed Geelstert 1 and Geelstert 2 Solar PV facilities on a site 11 km south-east of Aggeneys in the Northern Cape Province.*

*Geelstert 2 Solar PV Facility on the remaining extent of the farm Bloemhoek 61 near Aggeneys in the Northern Cape.*

The results of the report are based on desktop sources only. Previous surveys in the proposed route and adjacent areas did not identify significant heritage resources. The specialist concluded that no significant heritage resources would be negatively impacted by the proposed development.





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Recommendations provided in the report include the following:

- 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;
- A Chance Finds Procedure and a Fossil Finds Protocol are recommended to be followed.

It must be noted that the powerline route has not been surveyed in previously studies in its entirety and several previously identified heritage resources have not been noted in the above submitted report.

In an Interim Comment issued on the 19/09/2020, SAHRA stated that the Letter of Exemption for further assessment of heritage resources could not be accepted as the proposed development area had not been previously surveyed sufficiently and the visual impact of the proposed development on the heritage resources has not been conducted

SAHRA furthermore requested that a field-based HIA must be conducted, inclusive of an assessment of the visual impact of the development on the Gamsberg and Namiesberg massacre sites.

A response by the heritage specialist was submitted to the Heritage Report file stating that the submitted study was not based on desktop research, requesting clarity on the comment, and sought a way forward.

In an Interim Comment issued on the 02/10/2020, SAHRA noted the contents of the submitted response letter, however, reiterated the requirements for a field-based assessment and the inclusion of an assessment of the visual impact on the Gamsberg and Namiesberg massacre sites.

In a second response letter, which was also shared with the case officer from the Department of Environment, Forestry and Fisheries (DEFF) as the deciding authority, the heritage specialist further motivated that there was no need to undertake a field-based assessment due to the previous studies conducted within the area.

### Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has previously requested that a field-based survey be undertaken to effectively assess the impact of the proposed development on heritage resources that may be located within the proposed development footprint, in addition to assessment of the

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visual impact on the Gamsberg and Namiesberg massacre sites. This has not been completed and SAHRA is of the view that the assessment of the impact to heritage resources is incomplete.

Therefore, in terms of section 38(4)a of the NHRA, SAHRA cannot endorse this proposed development and advises the Department of Environment, Forestry and Fisheries (DEFF) to reject the EA application for the proposed Geelstert Grid Connection, near Aggeneys, Northern Cape Province, as no HIA that complies with section 38(3) as required by section 38(8) of the NHRA and section 24(4)b(iii) of the NEMA has been completed as part of the EA application.

This comment must be forwarded directly to the competent authority 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

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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

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**ADMIN:**  
Direct URL to case: <http://www.sahra.org.za/node/539149>  
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SARAO

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Date: 25 September 2020

To whom it may concern

**RE: BASIC ASSESSMENT REPORT FOR GEELSTERT 1, GEELSTERT 2 AND GRID CONNECTION.**

SARAO has completed the preliminary risk re-assessment about the electromagnetic emissions of the for the above-mentioned solar PV facilities and its possible impact on the SKA radio telescope.

In order to fully determine the level of risk on interference to the SKA Infrastructure Territory, SARAO requires an inventory of electrical equipment that will be deployed at the facility. However, based on the limited information currently at our disposal, the facilities pose a low risk of interference on the SKA Infrastructure Territory.

SARAO does not object the project but would appreciate if an inventory of electrical equipment could be provided at a later stage, so that re-assessment can be undertaken and EMI control plan developed if mitigations are required.

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,



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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.