

**COMMENTS RECEIVED (PERIOD 16**  
**SEPTEMBER 2022 - 04 OCTOBER**  
**2022**

**PROPOSED NEW 132KV GRID CONNECTION AND ASSOCIATED  
INFRASTRUCTURE FOR THE AUTHORISED EMOYENI WIND ENERGY  
FACILITIES, NEAR MURRAYSBURG, BEAUFORT WEST AND UBUNTU LOCAL  
MUNICIPALITIES AND CENTRAL KAROO AND PIXELY KA SEME DISTRICT  
MUNICIPALITIES**



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: 19578

Date: Tuesday October 04, 2022  
Page No: 1

## **Interim Comment**

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

Attention: Eskom Holdings SOC Limited

Limpopo Operating Unit  
Land Development and Environment Section

**The authorised Khangela Emoyeni and Umsinde Emoyeni Wind Energy Facilities (DFFE Ref: 14/12/16/3/3/2/687 and DFFE Ref:.14/12/16/3/3/2/686) have been selected as preferred bidder projects via private off take (i.e. private power purchase) procurement processes. The grid connection infrastructure for these two wind farm projects was previously assessed and authorised by the DFFE (DFFE Ref:14/12/16/3/3/2/684 and DFFE Ref:.14/12/16/3/3/2/685). However, following receipt of the relevant Environmental Authorisations for the grid connection infrastructure for the Umsinde and Khangela Emoyeni Wind Energy Facility, it was noted that several listed activities that were relevant to the grid infrastructure had not been considered, therefore a new Basic Assessment process will be undertaken that will now consider all the applicable listed activities as per the EIA Regulations. In addition, based on further technical analysis and liaison with Eskom it was determined that the previously authorised powerline routing is no longer optimal/suitable, and would need to be revised/optimized for the final layout and to comply with financial close requirements. A new Basic Assessment will therefore be undertaken to assess the revised (re-optimised) layout as well as all applicable listed activities, including the listed activities omitted from the original BA process. The proposed grid connection infrastructure will span between the Northern Cape and Western Cape Provinces.**

Nala Environmental Consulting has been appointed by Eskom Holdings SOC Limited to conduct an Environmental Authorisation (EA) Application for the proposed new 132KV Grid connection and associated infrastructure for the authorised Emoyeni Wind Energy Facilities, near Murraysburg, Beaufort West & Ubuntu Local Municipalities and Central Karoo & Pixely Ka Seme District Municipalities, Western Cape and Northern Cape Provinces.

It must be noted that this comment will only pertain to the Northern Cape section of the proposed development. Comments for the Western Cape sections of this development must be sought from Heritage

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Western Cape (HWC).

A draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include the construction of a 132kV powerline. Only a short section of the proposed powerline will pass through the Northern Cape Province, on farm Klipplaat 109.

Banzai Environmental (Pty) Ltd and PGS Heritage (Pty) Ltd were appointed to provide heritage specialist input as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Butler, E. 2022. Palaeontological Impact Assessment for the proposed powerline and grid connection associated with the authorised Umsinde Emoyeni and Khangela Emoyeni Wind Energy Facilities in the Northern Cape*

The proposed development area is underlain by Quaternary superficial deposits, Balfour and Teekloof Formations of the Adelaide Subgroup, and Jurassic Dolerite. A few weathered, fossiliferous outcrops were identified in the development footprint with fragmented fossils, however, it is unclear where these resources are located. A Chance Find Protocol is recommended to be followed.

*Mann, N and Fourie, W. 2022. Heritage Impact Assessment for the proposed 132kV powerline associated with the Emoyeni Wind Energy Facilities and Associated Infrastructure, near Murraysburg, Western and Northern Cape Provinces.*

No heritage resources were identified within the Northern Cape section of the proposed powerline. A Chance Finds Procedure is recommended to be implemented.

On the 04/10/2022, a letter was submitted notifying SAHRA of the resubmission of the BAR following the publishing of GNR. 2313 regarding the possible exclusion of the EA process for the proposed development.

### **Interim Comment**

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that the PIA be revised to include the following:

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- A map showing the location of the identified fossils shown on page 32 of the report and weathered fossiliferous outcrops within the proposed development area;
- Descriptions of the identified fossils and outcrops;
- An assessment of the significance of the identified fossils and outcrops.

Further comments will be issued upon receipt of the above revised report and the revised BAR as noted in the letter submitted on the 04/10/2022.

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/605392>  
(DEA, Ref: )

**PROPOSED NEW 132KV GRID CONNECTION AND ASSOCIATED  
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## water & sanitation

Department:  
Water and Sanitation  
REPUBLIC OF SOUTH AFRICA

Northern Cape Region  
Lower Orange Water Management Area  
Private Bag X5912, Upington, 8800  
Tel: (054) 338-5800, Fax: (054) 334-0205, [www.dwa.gov.za](http://www.dwa.gov.za)

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054 338 5800

Nala Environmental (Pty) Ltd Arlene Singh  
Suite 548  
Sunninghill,  
2157

By *E-mail*: [publicparticipation@nalaenvironmental.co.za](mailto:publicparticipation@nalaenvironmental.co.za)

**Attention:** Arlene Singh

**DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF THE 132KV GRID CONNECTION INFRASTRUCTURE, ASSOCIATED ACCESS TRACKS & WATER COURSE CROSSINGS ASSOCIATED WITH THE AUTHORISED EMOYENI WIND ENERGY FACILITIES, NEAR MURRAYSBURG, BEAUFORT WEST AND UBUNTU LOCAL MUNICIPALITIES AND CENTRAL KAROO AND PIXELY KA SEME DISTRICT MUNICIPALITIES, WESTERN CAPE, AND NORTHERN CAPE PROVINCES.**

Reference is made to the above-mentioned report with the Draft Basic Assessment Report dated September 2022, submitted to Department of Water and Sanitation.

This Department has no objection to the proposed amendments of the above-mentioned application and wish to comment as follows:

1. The 132kV Grid Connection Infrastructure, Associated Access Tracks & Water Course Crossings within a 400m wide development corridor including the access road to the Ishwati switching station triggers a section 21 (c and i) water uses of the National Water Act. In this regard the applicant is advised to apply for section 21 (c) and (i) of the National Water Act as according to these Act no development should take place within 100 metres from the edge of a watercourse or the riparian habitat without consent from this Department.
2. During the proposed project, fuel and diesel will be utilised to power vehicles and equipment. In this regard the applicant is advised to ensure proper lining of the diesel storage area to prevent any leakage and seepage to the ground water resources.
3. In case of leakages or spillages of hydrocarbons this department must be informed within 24 hours and immediate clean-up procedure must be conducted as stipulated in section

19 of the National Water Act; (Act 36 of 1998), any clean-up of the contaminants must be disposed of in a permitted hazardous landfill site and remediation report for the clean-up measures must be sent to the department for comments before implementation.

4. In cases where applicant intent to construct any underground insulations (e.g., batteries), the applicant is required to provide this Department with any information regarding any underground installation. Underground installations must be done according to the applicable SABS standards in order to minimize the potential for leakage and contamination of water resources.
5. The applicant must ensure that all hazardous and domestic waste generated is disposed of at licensed landfill site. A signed copy of service agreement shall be submitted to this Department to demonstrate that indeed provision will be made to render such services.
6. Storm water must be effectively managed and channelled effectively also the details of the storm water management plan must be forwarded to the local municipality for approval.
7. The Department recommends an appointment of a qualified Environmental Control Officer who will ensure that the activity does not lead to environmental degradation especially the water resources be it surface or underground.
8. Ground Water Management and monitoring must form part of risk management plan, please ensure that appropriate borehole monitoring points are sited and used for ground water level and quality monitoring only.

Please feel free to contact this department, should there be any enquiries.

Yours sincerely,



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**PROVINCIAL HEAD: NORTHERN CAPE OPERATIONS**  
**DATE: 23/09/2022**

Arlene Singh  
Nala Environmental  
publicparticipation@nalaenvironmental.co.za

30 September 2022

Dear Arlene

**Re: Basic Assessment Report for the 132kV Grid Connection Infrastructure associated with the authorised Emoyeni Wind Energy Facilities, Northern and Western Cape Provinces**

Thank you for the opportunity to comment on the above report. Unfortunately, we have noted some significant errors in the Terrestrial Biodiversity and Avifauna Assessment reports. These errors suggest that either there were some severe “cut and paste” mistakes, or that the specialist is unfamiliar with the terrestrial biodiversity and birds of the biodiversity. These errors have been repeated the Basic Assessment Report and are too numerous to list, but include:

- the suggestion that species not previously recorded anywhere near the site are likely to occur in the area (e.g. Woolly-necked Stork, *Ciconia episcopus*, Bateleur *Terathopius ecaudatus*, and Fynbos Golden Mole, *Amblysomus corriae*);
- potential impacts on Riverine Rabbit (*Bunolagus monticularis*) were not assessed, or indeed mentioned anywhere, despite the species being flagged in the Screening Report;
- incorrect descriptions of species and their habitat (e.g. Ludwig’s Bustard, *Neotis ludwigii*, prefer flat terrain not “rocky areas such as mountains and cliffs” as suggested in the report).

Regardless of the reasons for the errors, we are of the opinion that they are severe and significant enough to suggest the entire Terrestrial Biodiversity and Avifauna Assessment should be redone and resubmitted, as we have no confidence in the accuracy of the assessment.

Yours sincerely



Samantha Ralston-Paton  
Birds and Renewable Energy Project Manager





**Ref:** TPW/CFS/RP/LUD/REZ/SUB-01/31 (Job 29623)

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Nala Environmental  
Private Bag X26  
Suite 548  
**SUNNINGHILL**  
2157

Attention: Ms A Singh

Dear Madam

**PROPOSED NEW 132KV GRID CONNECTION AND ASSOCIATED INFRASTRUCTURE FOR THE AUTHORISED EMOYENI WIND ENERGY FACILITIES, NEAR MURRAYSBURG, BEAUFORT WEST AND UBUNTU LOCAL MUNICIPALITIES AND CENTRAL KAROO AND PIXELY KA SEME DISTRICT MUNICIPALITIES, WESTERN CAPE, AND NORTHERN CAPE PROVINCES: NOTICE OF BASIC ASSESSMENT REPORT AVAILABLE FOR REVIEW AND COMMENT**

1. Your letter dated 15 September 2022 refers.
2. This Branch offers no objection to the issuing of an Environmental Authorisation in favour of development of grid connection infrastructure, including overhead powerlines and substations/switching stations with associated access tracks and water course crossings for the authorised Umsinde Emoyeni, Ishwati Emoyeni and Khangela Emoyeni Wind Energy Facilities, provided that this Branch is offered the opportunity to comment on the land use application, at which stage this Branch will issue its approvals in terms of Act 21 of 1940 (building restrictions, if applicable) and Roads Ordinance 19 of 1976 (accesses and construction activities within the road reserves and adjacent building lines).
3. The following (Public) Provincial Roads (but not limited to the only roads that might be used during the construction and / or operational phases), all for which this Branch is the Road Authority, are either in the immediate vicinity or traversing the affected wind farm areas, wind farm shared infrastructure areas and the grid connection areas:
  - 3.1 Trunk Road 16 sections 9 and 10 (TR01609, TR01610);
  - 3.2 Divisional Road 2404, 2411 (DR02404, DR02411);
  - 3.3 Main Roads 607 and 606 (MR00607, MR00606); and

- 3.4 Minor Roads 9235, 9236, 9239, 9238, 9237, 9245, 9252, 9253 (OP09253, OP09236, OP09239, OP09238, OP09238, OP09245, OP09252, OP09253)
4. All the above-mentioned Provincial Roads' Public accessibility must be retained (if not closed / de-proclaimed to become private or servitude roads) and they must be evaluated for the purposes of construction, operation and decommissioning.
5. This Branch, for now, will ultimately require the following:
- 5.1 Indication of all the access(es) to each respective farm portion, ownership thereof and application for any changed access to the provincial road network - in line with this Branch's Access Management Guidelines, 2020. It will be required to clearly state which access will serve what purpose (e.g., energy and / or farming).
- 5.2 Construction applications, including wayleaves for third party services, when building restrictions, building lines and road reserves are affected.
- 5.3 Abnormal load transportation implications, which will require a route clearance report and prior application for any geometric and materials designs for approval before construction. It is recommended to commence with these planning in this regard once detail of energy infrastructure and transportation equipment are known.
- 5.4 A geotechnical and geometric design report, including improvement proposals, must be compiled to ensure that all the roads that will be affected by these developments during the construction phase are adequately improved and maintained before any other construction activity may commence on any of the farm portions. This is to ensure that no more than normal deterioration and additional maintenance costs are experienced by the Road Authority during the construction and operating phases. It will be required that any design affecting any Proclaimed Provincial Road must carry this Branch's Chief Directorate Road Design's approval before implementation thereof may commence.
- 5.5 Confirmation that a similar geotechnical proposal (as per paragraph 5.4) will be compiled and approval obtained prior to commencing with any major upgrade or decommissioning phase; whenever that may be.

Yours Sincerely



**SW CARSTENS**

**For DEPUTY DIRECTOR-GENERAL: ROADS**

**DATE: 10 OCTOBER 2022**

## ENDORSEMENTS

1. Nala Environmental  
Attention: Ms A Singh (e-mail: [publicparticipation@nalaenvironmental.co.za](mailto:publicparticipation@nalaenvironmental.co.za))
2. Central Karoo District Municipality  
Attention: Mr A Koopman (e-mail)
3. District Roads Engineer  
Oudtshoorn
4. Mr E Burger (e-mail)
5. Mr SW Carstens (e-mail)
6. Mr F Fakier (e-mail)

**COMMENTS RECIEVED (NEW PUBLIC  
PARTICIPATION PERIOD: 13 SEPTEMBER  
2022 TO 14 NOVEMBER 2022) TO BE  
INCLUDED IN FINAL BASIC ASSESSMENT  
REPORT**