

Comments Received

BirdLife

24 July 2020

Ronald Baloyi
Savannah Environmental
By email: 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

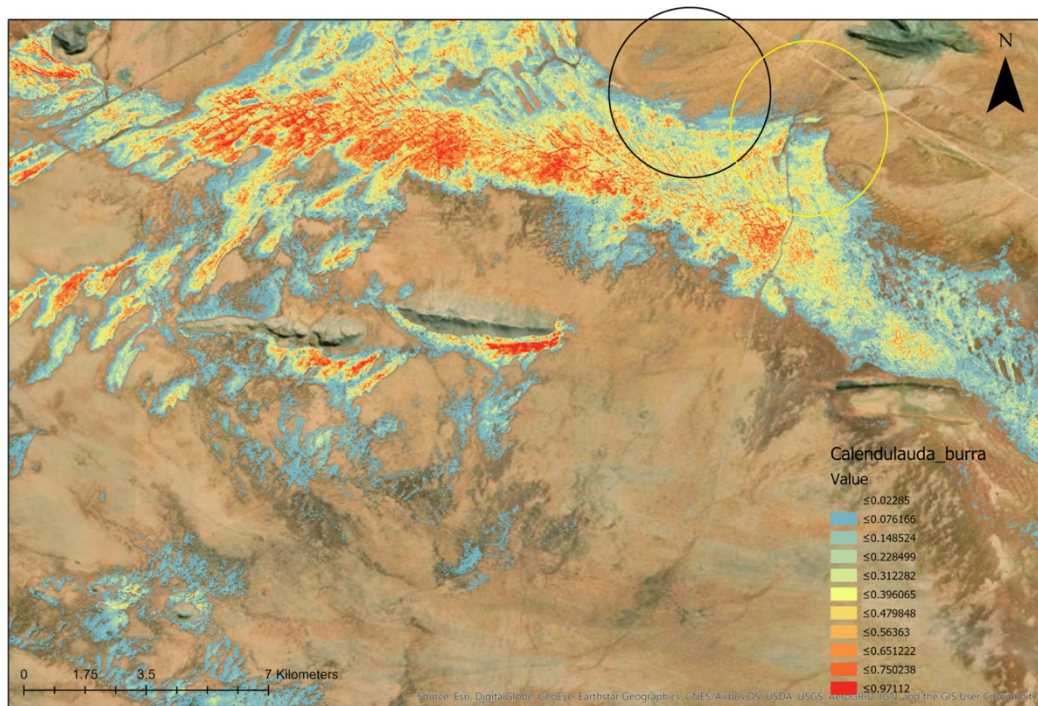


Samantha Ralston-Paton
Birds and Renewable Energy Project Manager.

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



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
Megawatt Park, D1Y42, Maxwell Drive, Sunninghill, Sandton.

SAHRA



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

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 or 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).

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Date: Monday August 17, 2020

Page No: 2

CaseID: 15332

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

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

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>



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Date: Monday August 17, 2020

Page No: 3

CaseID: 15332

(DEA, Ref:)

I&APs

Savannah Public Process

From: Mark Botha [REDACTED]
Sent: Wednesday, August 12, 2020 10:24 AM
To: Savannah Public Process; Dr Philip Desmet; Kerry Purnell; Ben-Jon Dreyer; Pieter David Venter; Jacobus HL. Smit; Elsabe Swart; Peter Cloete; Conrad Geldenhuys; Muhammad Essop
Subject: Proposed Geelstert PV application - Farms Bloemhoek, Aggeneys

Dear Nicolene (cc DFFE and DENC colleagues)

Please register me as an I&AP for the DBAR process for the proposed Geelstert PV application. Also, please note the others copied on this email who may also wish to be registered, or who require a dedicated comment opportunity.

Please could you send through a detailed layout of the application. I note with interest that there are two prior applications over the relevant farm portions which have already been approved, and wonder how this new application resonates with that. Please note further, that portions of the farms Bloemhoek and Aggeneys have either 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.

Please advise your client that if any of the sensitive biodiversity features are to be impacted, that a significant biodiversity offset is likely to be required, which has bearing on project location, layout and viability.

I urge your client to engage frankly with the various regulators and landowners in this region prior to committing further to this process, and also to undertake a grid connection and capacity study upfront to determine whether additional connections can be accommodated (given the large number of existing approved projects).

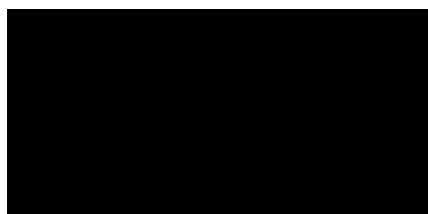
Look forward to hearing from you

regards

Mark Botha

Conservation Strategy, Tactics and Insight

Pr.Sci.Nat



"If we have decided what the answers cannot be - or what answers we could not cope with - then there seems little point, beyond a fondness for the truth, in asking the questions" - D Murray