

## Gabriele Wood

---

**From:** Wayleave Management Section CR <WayleaCR@telkom.co.za>  
**Sent:** 24 January 2017 09:09  
**To:** Gabriele Wood  
**Subject:** RE: REALIGNMENT OF A SECTION OF THE MN73 TO ACCOMMODATE SOLAR ENERGY FACILITIES NEAR PAULPUTS SUBSTATION, NORTHERN CAPE PROVINCE - NOTICE OF BASIC ASSESSMENT PROCESS

Good day

Please provide us with sketches/maps that shows the stand numbers so that we can indicate our infrastructure on. We can't use Google earth maps to update.

Kind regards

Chris Schutte  
Mvelaphande Trading  
[SchutCE5@telkom.co.za](mailto:SchutCE5@telkom.co.za)  
051 401 6701 / 081 045 5686

---

**From:** Gabriele Wood [mailto:gabriele@savannahsa.com]  
**Sent:** Monday, January 23, 2017 5:08 PM  
**Subject:** REALIGNMENT OF A SECTION OF THE MN73 TO ACCOMMODATE SOLAR ENERGY FACILITIES NEAR PAULPUTS SUBSTATION, NORTHERN CAPE PROVINCE - NOTICE OF BASIC ASSESSMENT PROCESS

Dear Stakeholder

The area immediately surrounding the Paulputs Substation (located approximately 45km north-east of Pofadder), and specifically Portion 4 of the Farm Scuitklip 92 has become a node for solar energy facility developments. Two Concentrated Solar Power (CSP) facilities and one photovoltaic (PV) facility have already been constructed in this area. These are known as the Kaxu Solar One, Xina Solar One and Konkoonsies IPV plants respectively. Another PV facility (known as Konkoonsies II PV) is to be constructed during 2017, and a third CSP facility (known as the Paulputs CSP project) received an environmental authorisation on 16 November 2016.

The development of the solar energy facilities is in response to the requirement for additional electricity generation capacity at a national level and in response to identified objectives of the national, provincial, local and district municipalities to develop renewable energy facilities. In order to facilitate the construction of the Paulputs CSP Facility, the Northern Cape Department of Roads and Public Works (NC DR&PW) propose that a section of the MN73 road traversing Portion 4 of the Farm Scuitklip 92 is to be realigned.

The MN73 realignment is proposed in order to accommodate the Paulputs CSP Facility while ensuring safe road use for the surrounding landowners currently utilising the MN73.

Savannah Environmental (Pty) Ltd has been appointed as the independent environmental consultant, to undertake the required Basic Assessment to identify and assess all the potential environmental impacts associated with the proposed projects and propose appropriate mitigation and management measures in an Environmental Management Programme (EMPr). The public participation process, which forms part of the overall Basic Assessment process, will also be undertaken by Savannah Environmental. Please refer to the attached notification letter for further information regarding the project. Please return the attached Reply Form in order to register as an Interested and Affected Party (I&AP) for this project.

Kind regards

**Mrs Gabriele Wood**

**Public Participation and Social Consultant**

**Savannah Environmental (Pty) Ltd**

**Tel: 27 11 656 3237**

**Fax: 086 684 0547**

**Email: [gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)**

**[www.savannahsa.com](http://www.savannahsa.com)**

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## Gabriele Wood

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**From:** Thalita Botha <thalita@savannahsa.com>  
**Sent:** 06 February 2017 10:51  
**To:** WayleaCR@telkom.co.za  
**Cc:** 'Gabriele Wood'  
**Subject:** RE: REALIGNMENT OF A SECTION OF THE MN73 TO ACCOMMODATE SOLAR ENERGY FACILITIES NEAR PAULPUTS SUBSTATION, NORTHERN CAPE PROVINCE - NOTICE OF BASIC ASSESSMENT PROCESS  
**Attachments:** Road Realignment - Layout Map.jpg

Dear Chris,

Kindly see attach the Layout Map for the proposed Road Realignment which indicates the stand numbers as requested.

Kind regards

---

**From:** Wayleave Management Section CR [<mailto:WayleaCR@telkom.co.za>]  
**Sent:** 24 January 2017 09:09  
**To:** Gabriele Wood <[gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)>  
**Subject:** RE: REALIGNMENT OF A SECTION OF THE MN73 TO ACCOMMODATE SOLAR ENERGY FACILITIES NEAR PAULPUTS SUBSTATION, NORTHERN CAPE PROVINCE - NOTICE OF BASIC ASSESSMENT PROCESS

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Mvelaphande Trading  
[SchutCE5@telkom.co.za](mailto:SchutCE5@telkom.co.za)  
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**Sent:** Monday, January 23, 2017 5:08 PM  
**Subject:** REALIGNMENT OF A SECTION OF THE MN73 TO ACCOMMODATE SOLAR ENERGY FACILITIES NEAR PAULPUTS SUBSTATION, NORTHERN CAPE PROVINCE - NOTICE OF BASIC ASSESSMENT PROCESS

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Kind regards

**Mrs Gabriele Wood**

**Public Participation and Social Consultant**

**Savannah Environmental (Pty) Ltd**

**Tel: 27 11 656 3237**

**Fax: 086 684 0547**

**Email: [gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)**

**[www.savannahsa.com](http://www.savannahsa.com)**

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~~~~~

**Gabriele Wood**  
Public Participation and Social Consultant  
Email: [gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)  
[www.savannahSA.com](http://www.savannahSA.com)



Tel: +27 11 656 3237 | Fax: +27 86 684 0547 | P.O. Box 148, Sunninghill, 2157  
1st Floor, Block 2, 5 Woodlands Drive Office Park, Woodlands Drive, Woodmead, 2191

*Awarded Leading Environmental Consultant on Wind Projects in 2013 & 2015 (SAWEA)*

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**ENVIRONMENTAL IMPACT ASSESSMENT PROCESS  
PUBLIC PARTICIPATION PROCESS  
REALIGNMENT OF THE MN73 TO ACCOMMODATE SOLAR ENERGY FACILITIES NEAR PAULPUTS  
SUBSTATION, NORTHERN CAPE PROVINCE  
INTERESTED AND AFFECTED PARTY REGISTRATION AND COMMENT SHEET**

Return completed reply form to: **Gabriele Wood** of **Savannah Environmental (Pty) Ltd**

Fax: 086 699 5796

Phone: 011 6563237

E-mail: gabriele@savannahsa.com

Postal Address: P O Box 148 Sunninghill 2157

**Please provide your complete contact details:**

Name & Surname:

MPILO MASONDO

Organisation & Designation:

ESKOM HOLDINGS SOC LTD - ENVIRONMENTAL OFFICER

Postal Address:

P O BOX 1091

JOHANNESBURG, 2000

Telephone:

011 576 7676

Cellphone:

073 1800 161

Fax:

—

E-mail:

MPILO.MASONDO@ESKOM.CO.ZA

**Would you like to register as an interested and affected party (I&AP)?** YES  NO

(please tick the relevant box)

Note: Please register as an I&AP to receive further correspondence regarding the EIA process for the project. Once registered on the project database, your contact details MAY be included in public documentation.

**Please state your interest in the project** (add additional pages if necessary):

ESKOM is proposing the construction of a 400kV power line from Aggeneis Substation to Paulputs Substation with an extension of the 400kV yard at Paulputs Substation. As the abovementioned project is close to Paulputs Substation, we would like to be kept abreast of its developments.

**Please list your questions, views or concerns regarding the project** (add additional pages if necessary):

**Please provide contact details of other persons who you regard as a potential interested or affected party:**

Name & Surname:

Organisation & Designation:

Postal Address:

Telephone:

Cellphone:

Fax:

E-mail:



## Gabriele Wood

---

**From:** Nadia Goltz <ngoltz@ncpg.gov.za>  
**Sent:** 31 January 2017 11:19  
**To:** gabriele@savannahSA.com  
**Subject:** Notification of Availability of Basic Assessment Report Section MN73 to Accommodate Solar Energy Facilities near Paulputs (Northern Cape Province)

Dear Ms Wood

I have received your notification. Can you please indicate the region in the Northern Cape where Paulputs Substation is located?

Thanking you in advance

Nadia Goltz

Department of Agriculture, Land Reform and Rural Development, Northern Cape Province

Directorate: Sustainable Resource Management  
162 George Street  
Private Bag X5018, Kimberley, 8300  
Tel: (053) 838 9160,  
Fax : 086 771 8754

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## Gabriele Wood

---

**From:** Gabriele Wood <gabriele@savannahsa.com>  
**Sent:** 01 February 2017 16:19  
**To:** 'Nadia Goltz'  
**Cc:** thalita@savannahsa.com  
**Subject:** RE: Notification of Availability of Basic Assessment Report Section MN73 to Accommodate Solar Energy Facilities near Paulputs (Northern Cape Province)  
**Attachments:** Paulputs Road Realignment - Locality Map - 11.01.17.pdf; Paulputs Road Realignment.kmz

Dear Nadia

The Paulputs road realignment is located within the Khai Ma Local Municipality and the Namakwa District Municipality. I have attached a locality map and a kmz file of the site for your reference.

Please do not hesitate to contact me if you have any further queries in this regard.

Kind regards

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

-----Original Message-----

**From:** Nadia Goltz [mailto:ngoltz@ncpg.gov.za]  
**Sent:** 31 January 2017 11:19  
**To:** gabriele@savannahSA.com  
**Subject:** Notification of Availability of Basic Assessment Report Section MN73 to Accommodate Solar Energy Facilities near Paulputs (Northern Cape Province)

Dear Ms Wood

I have received your notification. Can you please indicate the region in the Northern Cape where Paulputs Substation is located?

Thanking you in advance

Nadia Goltz

Department of Agriculture, Land Reform and Rural Development, Northern Cape Province

Directorate: Sustainable Resource Management  
162 George Street  
Private Bag X5018, Kimberley, 8300  
Tel: (053) 838 9160,  
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# agriculture, forestry & fisheries

Department:  
Agriculture, Forestry and Fisheries  
REPUBLIC OF SOUTH AFRICA

Directorate: Forestry Management (Other Regions)  
P.O. Box 2782, Upington, 8800, Tel 054 338 5909, Fax 054 334 0030

**Enquiries:** J Mans  
**E-mail:** [JacolineMa@daff.gov.za](mailto:JacolineMa@daff.gov.za)  
**Date:** 31 January 2017  
**Ref:** 40.8.14.2/NC/72

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

**ATTENTION:** Gabriele Wood ([Gabriele@savannahSA.com](mailto:Gabriele@savannahSA.com))

**RE: COMMENTS ON DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED REALIGNMENT OF A SECTION OF THE MN73 TO ACCOMMODATE SOLAR ENERGY FACILITIES NEAR PAULPUTS SUBSTATION, NORTHERN CAPE PROVINCE (DENC REF: NOT SUPPLIED)**

## 1. DEPARTMENTAL MANDATE

The Directorate: Forestry Management (Other Regions) in the Department of Agriculture, Forestry and Fisheries (DAFF) is responsible for implementation of the **National Forests Act, Act 84 of 1998 (NFA)** and the **National Veld and Forest Fires Act, Act 101 of 1998** as amended. The developer must take note of the following sections of the NFA:

### 1.1 Section 12(1): "The Minister may declare-

- (a) a particular tree,
- (b) a particular group of trees,
- (c) a particular woodland; or
- (d) trees belonging to a particular species, to be a protected tree, group of trees, woodland or species.

### 1.2 Section 15(1): "No person may-

- (a) Cut, disturb, damage or destroy any protected tree; or
- (b) Possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, or any forest product derived from a protected tree, except-
  - (i) under a license granted by the Minister; or
  - (ii) in terms of an exemption from the provision of this subsection published by the Minister in the Gazette on the advice of the Council."

- 1.3 “Any person who contravenes the prohibition on-
- (i) The cutting, disturbance, damage or destruction of temporarily protected trees or groups of trees referred to in section 14(2) or protected trees referred to in section 15(1)(a); or
  - (ii) The possession, collection, removal, transport, export, purchase or sale of temporarily protected trees or groups of trees referred to in section 14(2) or protected trees referred to in section 15(1)(b), or any forest product derived from a temporarily protected tree, group of trees or protected tree, is guilty of a first category offence.
- 1.4 Section 58 (1): “Any person who is guilty of a first category offence referred to in sections 62 and 63 may be sentenced to a fine or imprisonment for a period of up to three years, or to both a fine and such imprisonment.”
- 1.5 The list of protected tree species under section 12(1) (d) of the National Forests Act, 1998 (Act No. 84 of 1998) was published in GN1602 of 23 December 2016.

## 2. COMMENTS ON BASIC ASSESSMENT REPORT (BAR)

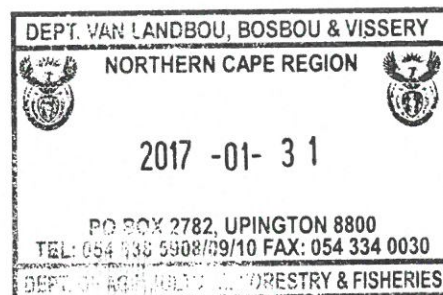
- 2.1 The report did not confirm the presence of NFA listed protected tree species on site, but stated that there is a high probability that Camel thorn *Vachellia erioloba* may occur on site. All possible efforts should be made to minimise impacts on protected trees. Where such specimens cannot be avoided, a license must be applied for and obtained prior to disturbance of any protected tree.
- 2.2 The report confirmed the presence of the provincially protected Quiver tree *Aloidendron dichotomum*. There is currently a Moratorium in place in the Northern Cape, prohibiting removal of this species from the wild. For more information, contact Nature Conservation.

Thank you for notifying the Department of the proposed project.

Kind Regards,

  
Jacoline Mans

Chief Forester: NFA Regulation





## 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)

F ☒ 054 334 0205

E ☒ [SchwartzC@dws.gov.za](mailto:SchwartzC@dws.gov.za)

☒ MF Mashitsho

☒ 054 338 5854

☒ **By Registered Mail**

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

**Attention: Karen Jodas**

**DRAF ENVIRONMENTAL IMPACT ASSESSMENT PROCESS AND BASIC ASSESSMENT REPORT FOR THE REALIGNMENT OF A SECTION OF THE MN73 ROAD TO ACCOMMODATE A SOLAR ENERGY FACILITY, 45KM NORTH EAST OF POFADDER NEAR PAULPUTS SUBSTATION IN NORTHERN CAPE PROVINCE.**

The Department of Water & Sanitation (DWS) hereby acknowledges receipt of the Draft Environmental Impact Assessment Process and Basic Assessment Report for the realignment of a section of the MN73 to accommodate a solar energy facility, 45km north east of Pofadder near PaulPuts substation in Northern Cape Province.

The Department takes note of the proposed activity and therefore provides the following comments:

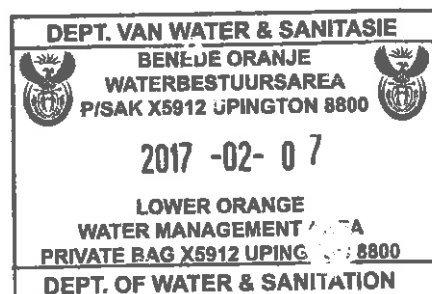
- ❖ It is indicated on page 50 of the above mentioned report, that water and sewage services will be provided by the Local Municipality, therefore an agreement letter between the applicant and the Local Municipality should be submitted to this Department.
- ❖ Please note that the proposed activity requires a water use licence in terms of section 40 of the National Water Act (Act 36 of 1998) therefore an application should be submitted to this Department.
- ❖ The proposed activity will require that the applicant develop a storm water management plan for the bridge construction.

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

Yours sincerely,

**CEO (ACTING): ORANGE PROTO-CMA**

DATE: 03/02/2017



## Gabriele Wood

---

**From:** Thalita Botha <thalita@savannahsa.com>  
**Sent:** 07 February 2017 07:51  
**To:** 'Gabriele Wood'  
**Subject:** FW: CPDR0057-17 :REALIGNMENT OF A SECTION OF THE MN73 TO ACCOMODATE SOLAR ENERGY FACILITIES NEAR PAULPITS SUBSTATION ,NORTHERN CAPE PROVINCE - NOTICE OF BASIC ASSESMENT PROCESS

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**From:** Mothobi Martins (MC) [mailto:MartiMC2@telkom.co.za]  
**Sent:** Monday, 06 February 2017 4:05 PM  
**To:** thalita@savannahsa.com  
**Subject:** CPDR0057-17 :REALIGNMENT OF A SECTION OF THE MN73 TO ACCOMODATE SOLAR ENERGY FACILITIES NEAR PAULPITS SUBSTATION ,NORTHERN CAPE PROVINCE - NOTICE OF BASIC ASSESMENT PROCESS

Good day,

We acknowledge the receipt of your application for services: [Realignment of a section of the MN73 to accommodate Solar Energy Facilities near Paulputs Substation, Northern Cape Province](#), Our Reference CPDR0057-17 for further enquiries in this regard.

Regards

Mothobi Martins  
[MartiMC2@telkom.co.za](mailto:MartiMC2@telkom.co.za)  
051 401 6320

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**Thalita Botha**  
Environmental Consultant  
Cell: 083 686 4538  
Email: thalita@savannahsa.com  
[www.savannahSA.com](http://www.savannahSA.com)



Tel: +27 11 656 3237 | Fax: +27 86 684 0547 | P.O. Box 148, Sunninghill, 2157  
1st Floor, Block 2, 5 Woodlands Drive Office Park, Woodlands Drive, Woodmead, 2191

*Awarded Leading Environmental Consultant on Wind Projects in 2013 & 2015 (SAWEA)*

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Mvelaphande Trading

**Mvelaphande Trading**  
44 B Mill Street  
BLOEMFONTEIN  
9300

**Enquiries:** Mothobi Martins  
**Telephone:** 051 - 401 6320/ 0827376286  
**Fax :** 088 0514016238  
**E-mail :** MartiMC2@telkom.co.za

Our reference: **CPDR0057-17**

Your reference: N/A

07 February 2017

MRS GABRIELE WOOD  
PUBLIC PARTICIPATION AND SOCIAL CONSULTANT  
SAVANNAH ENVIRONMENTAL (Pty) Ltd  
011 656 3237

### **REALIGNMENT OF A SECTION OF THE MN73 TO ACCOMMODATE SOLAR ENERGY FACILITIES NEAR PAULPUTS SUBSTATION, NORTHERN CAPE PROVINCE – NOTICE OF BASIC ASSESMENT PROCESS**

With reference to your letter dated 23 January 2017.

With reference to your above-mentioned application, I hereby inform you that our Client (Telkom SA SOC Ltd) approves the proposed work indicated on your drawings in terms Section 29 of the Electronic Communications Act 36 of 2005 as amended.

Any changes/deviations from the original planning during or prior to construction must immediately be communicated to this office.

Our Client ( Telkom SA SOC Ltd )'s infrastructure is affected by this proposal and the route is marked in GREEN and highlighted in GREEN on attached sketch as accurately as possible. **We did our utmost to ensure that we indicate our route as accurate as possible and should you discover any of our cables that are not on the sketch please stop and contact us immediately to arrange a site meeting. Please make use of pilot holes in order not to damage our infrastructure.** Therefore any damages occurred during construction of work will be repaired at the customer's account. Consequently, the following conditions apply:

Aerial Plant - At points of crossing, the overhead power lines should cross above the communications lines in accordance with and clearances stipulated in the Occupational Health and safety Act no 85 of 1993, Machinery regulations 20 – Crossings, and Electrical machinery Regulations 15 – Clearance of Power Lines. If the specifications could not be met, all deviation costs will be for the applicant's account. We also refer to section 25 of Electronic Communication Act 36 of 2005.

At points of crossing, the overhead power line should cross over the overhead communication lines with a minimum vertical separation of **0.8** meters.

Suitable protection as laid down in section 5 of the Code of Practice should be provided at all important crossings.

The crossing of supply lines or overhead service mains directly above or adjacent to communication poles must be avoided if possible. If not clearance of **3** meters must be provided. In order to minimize noise induction into the telecommunication systems, the angle of crossing between the overhead power line and all communication lines, should be as near to a right angle as possible – the following deviation from the right angle being permitted at:

- Power voltage of 48 kV and higher - 30 degrees
  - Power voltage of lower than 48 kV - 45 degrees
- .....SWER must be as near as 90 degrees as possible

Approved on condition that, should it later be found necessary to deviate the existing communication line due to existing noise interference or any other reason whatsoever, the cost of such remedial action shall be repayable.

Paragraph 2.4.1 of the Code of Practice stipulates the minimum acceptable horizontal separation between power and the communication lines and where this cannot be met, the design of the power line is also stipulated. This could apply between the attached plans and these requirements should strictly be adhered to.

In cases where an underground power cable will run parallel with an existing underground communication cable, a separation as great as possible should be maintained with a minimum separation of 600mm. should the separation be less than 600mm and the power cable are not enclosed in a suitable pipe, a concrete slab must be provided immediately above the power cable for the length of parallelism. If the separation is less than 300mm, additional protection is required by placing concrete slabs between our Client (Telkom SA SOC Ltd) cables/pipes and the power cables.

Underground Crossings - At the points where our Client (Telkom SA SOC Ltd)'s existing underground communication cable will be crossed by an underground cable, the latter should be laid a depth of at least 300mm below the communication cable – normally laid at a depth of 600mm. If the power cable is not enclosed in a suitable pipe, protection in the form of a concrete slab should be provided immediately above the power cable for a minimum of 2 (Two) metres on either side of crossing.

Calculations have shown that an earth fault on the high voltage Power lines will induce excessive low frequency induction into the Communication lines. As a result of this, the cost to deviate / alter the communication lines to prevent this induction will be for the power provider.

Relocations of our Client (Telkom SA SOC Ltd) plant will be done at customer's request and will be a repayable project.

Please notify the office within 21 working days from date of this letter of acceptance and if any alternative proposal is available of if a recoverable work should commence, the liaison officer is **Mothobi Martins** at tel. no. **051 – 401 6320**.

As important cables are affected, **Mr Vivian Groenewald must be contacted at 054 – 338 6501 / 081 362 6738 two weeks prior of commencement on construction work. It would be appreciated if this office can be notified within 30 days on completion of construction work.** Confirmation is required on completion of construction as per agreed requirements.

**On completion of this project please certify that all requirements as stipulated in this letter have been met. Please note that should any of our Client (Telkom SA SOC Ltd) infrastructure has to be relocated or altered as a result of your activities the cost for such alterations or relocations will be for your account in terms of section 25 of the Electronic Communications Act.**

This approval is valid for 6 months only, after which re-application must be made if the work has not been completed.

Should our Client (Telkom SA SOC Ltd) infrastructure be damaged while work is undertaken, kindly call the Toll free number **0800203951** immediately

All of our Client (Telkom SA SOC Ltd) rights remain reserved.

**Mr Vivian Groenewald must be contacted at 054 – 338 6501 / 081 362 6738, before any commencement of work.**

Yours faithfully



MOTHOBI MARTINS





POLE AFFECTED  
VERY IMPORTANT  
OVERHEAD

EXISTING / PROPOSED PLANT APPROVED / NOT APPROVED  
INFO AND LEGEND PROVIDED BY  
M. MARTINS  
PLANNER  
07/02/17  
VAAL KOPPIES  
RE280/2/17  
DATE  
PP Fanie  
SUPERVISOR  
10  
SIGNATURE  
DATE

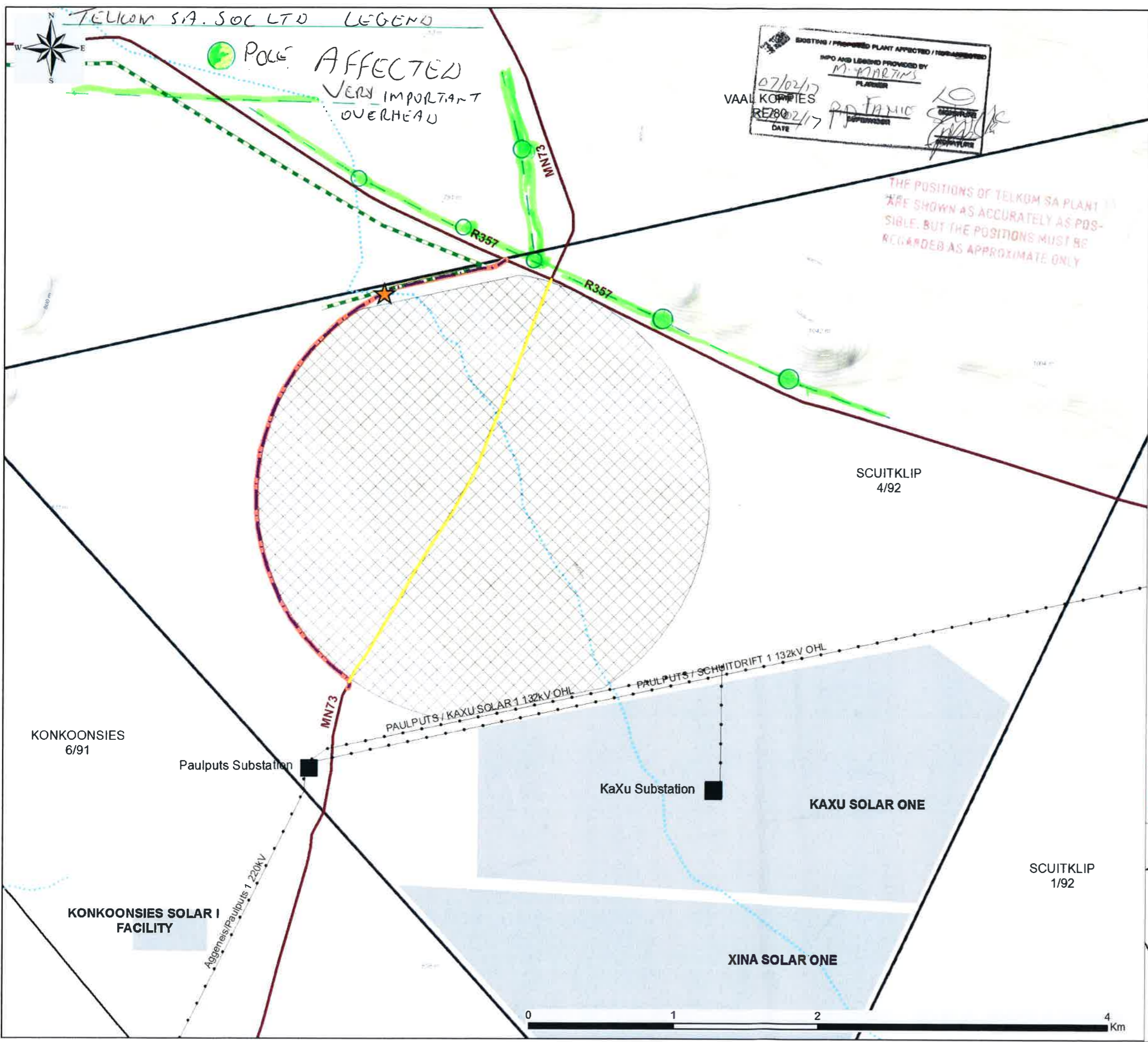
THE POSITIONS OF TELKOM SA PLANT ARE SHOWN AS ACCURATELY AS POSSIBLE. BUT THE POSITIONS MUST BE REGARDED AS APPROXIMATE ONLY

### PROPOSED REALIGNMENT OF A SECTION OF MNN73 ROAD, NORTHERN CAPE

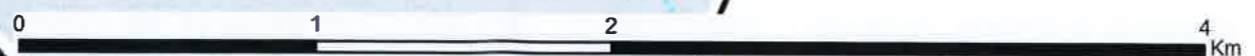
Layout Map

#### Legend

- Existing Substations
  - Watercrossing
  - Eskom Powerline
  - National road
  - Regional road
  - Main road
  - Ephemeral Wash
  - Paulputs CSP Water Pipeline
  - Paulputs CSP Heliostat Field
  - Farm Portions
  - Existing Solar Facilities
  - Portion 4 of Scuitklip 92
- Layout Plan:**
- Existing MN73 section to be decommissioned
  - Realigned MN73 section
  - Realigned MN73 40m assessment corridor
  - Farm Portions



**Savannah** Scale 1:25 000  
 ENVIRONMENTAL (PTY) LTD Projection: LO19 WGS 1984  
 Paulputs Road Realignment - Layout map - 21.09.16



## Gabriele Wood

---

**From:** SerahMu <SerahMu@daff.gov.za>  
**Sent:** 15 February 2017 11:40  
**To:** Gabriele Wood  
**Subject:** RE: REALIGNMENT OF A SECTION OF THE MN73 TO ACCOMMODATE SOLAR ENERGY FACILITIES NEAR PAULPUTS SUBSTATION, NORTHERN CAPE PROVINCE - NOTICE OF BASIC ASSESSMENT PROCESS

Good Day Gabriele

Kindly see the requested information in red below.

Regards

Serah

---

**From:** Gabriele Wood [mailto:gabriele@savannahsa.com]  
**Sent:** 15 February 2017 11:20 AM  
**To:** SerahMu  
**Subject:** RE: REALIGNMENT OF A SECTION OF THE MN73 TO ACCOMMODATE SOLAR ENERGY FACILITIES NEAR PAULPUTS SUBSTATION, NORTHERN CAPE PROVINCE - NOTICE OF BASIC ASSESSMENT PROCESS

Dear Serah

Thank you for your email. Please can you provide me with the following information in order to register on the database:

Office Tel: 012 319 7480

Fax: 012 329 5938

Cell phone: 083 779 6631

Email: SerahMu@daff.gov.za

Street Address: The Department of Agriculture, Forestry and Fisheries, Corner Annie Botha and Union Street, Gezina, 0184

Postal Address: The Department of Agriculture, Forestry and Fisheries, P.O. box 250, Pretoria, 0001

Thank you.

Kind regards,

**Gabriele Wood**

Public Participation and Social Consultant | Savannah Environmental (Pty) Ltd

Tel: +27 11 656 3237 | Fax: +27 86 684 0547

---

**From:** SerahMu [mailto:SerahMu@daff.gov.za]  
**Sent:** 14 February 2017 10:31  
**To:** gabriele@savannahsa.com  
**Cc:** KhuthalaD <KhuthalaD@daff.gov.za>  
**Subject:** RE: REALIGNMENT OF A SECTION OF THE MN73 TO ACCOMMODATE SOLAR ENERGY FACILITIES NEAR PAULPUTS SUBSTATION, NORTHERN CAPE PROVINCE - NOTICE OF BASIC ASSESSMENT PROCESS

Good Day

Kindly note that the Department of Agriculture, Forestry and Fisheries would like to be registered as an affected party I the proposed project.

I currently cannot fill in the form as our scanning machine is not working

Regards

Serah

---

**From:** Gabriele Wood [<mailto:gabriele@savannahsa.com>]

**Sent:** 23 January 2017 05:08 PM

**Subject:** REALIGNMENT OF A SECTION OF THE MN73 TO ACCOMMODATE SOLAR ENERGY FACILITIES NEAR PAULPUTS SUBSTATION, NORTHERN CAPE PROVINCE - NOTICE OF BASIC ASSESSMENT PROCESS

Dear Stakeholder

The area immediately surrounding the Paulputs Substation (located approximately 45km north-east of Pofadder), and specifically Portion 4 of the Farm Scuitklip 92 has become a node for solar energy facility developments. Two Concentrated Solar Power (CSP) facilities and one photovoltaic (PV) facility have already been constructed in this area. These are known as the Kaxu Solar One, Xina Solar One and Konkoonsies IPV plants respectively. Another PV facility (known as Konkoonsies II PV) is to be constructed during 2017, and a third CSP facility (known as the Paulputs CSP project) received an environmental authorisation on 16 November 2016.

The development of the solar energy facilities is in response to the requirement for additional electricity generation capacity at a national level and in response to identified objectives of the national, provincial, local and district municipalities to develop renewable energy facilities. In order to facilitate the construction of the Paulputs CSP Facility, the Northern Cape Department of Roads and Public Works (NC DR&PW) propose that a section of the MN73 road traversing Portion 4 of the Farm Scuitklip 92 is to be realigned.

The MN73 realignment is proposed in order to accommodate the Paulputs CSP Facility while ensuring safe road use for the surrounding landowners currently utilising the MN73.

Savannah Environmental (Pty) Ltd has been appointed as the independent environmental consultant, to undertake the required Basic Assessment to identify and assess all the potential environmental impacts associated with the proposed projects and propose appropriate mitigation and management measures in an Environmental Management Programme (EMPr). The public participation process, which forms part of the overall Basic Assessment process, will also be undertaken by Savannah Environmental. Please refer to the attached notification letter for further information regarding the project. Please return the attached Reply Form in order to register as an Interested and Affected Party (I&AP) for this project.

Kind regards

**Mrs Gabriele Wood**

**Public Participation and Social Consultant**

**Savannah Environmental (Pty) Ltd**

**Tel: 27 11 656 3237**

**Fax: 086 684 0547**

**Email: [gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)**

**[www.savannahsa.com](http://www.savannahsa.com)**

**Gabriele Wood**

Public Participation and Social Consultant

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

[www.savannahSA.com](http://www.savannahSA.com)



Tel: +27 11 656 3237 | Fax: +27 86 684 0547 | P.O. Box 148, Sunninghill, 2157  
1st Floor, Block 2, 5 Woodlands Drive Office Park, Woodlands Drive, Woodmead, 2191

*Awarded Leading Environmental Consultant on Wind Projects in 2013 & 2015 (SAWEA)*

**Disclaimer**

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# Realignment of a section of The MN73 to Accomodate Solar Energy Facilities Near Paulputs Substation

Our Ref:



an agency of the  
Department of Arts and Culture

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

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: nhiggitt@sahra.org.za  
CaseID: 10604

Date: Friday February 17, 2017  
Page No: 1

## Interim Comment

### In terms of Section 38(2) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Northern Cape- Department of Roads and Pulic Works

**In order to accommodate the planned solar energy facilities in the vicinity of the Paulputs Substation, a realignment of a section of the MN73 is required and will entail the construction of a new section of road ~4km in length and ~7m wide (with a road reserve of 20m) according to approved Northern Cape Department of Roads and Public Works (NC DR&PW) plans and standards; and the decommissioning of ~3km of the existing MN73 road as and where required after commissioning the realigned section. Portions of the decommissioned section of the MN73 road will not be rehabilitated where these are used to provide internal access for the Paulputs CSP Facility.**

Savannah Environmental (Pty) Ltd was appointed by the Northern Cape Department of Roads and Public Works to conduct an Environmental Authorisation Application for the proposed realignment of a section of the MN73 near the Paulputs Substation, Northern Cape Province. A draft Basic Assessment Report (dBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations 2014. The proposed development will entail the realignment of the MN73 to avoid the authorised Paulputs CSP development. A new section of road ~4 km in length and ~7 m wide will be constructed.

The McGregor Museum Department of Archaeology was appointed to conduct the Archaeological Impact Assessment (AIA) for the project.

*Morris, D. 2016. Paulputs CSP Project and Road Realignment of the MN73 near Pofadder, Northern Cape: Specialist Input for the Impact Assessment Phase of the Environmental Impact Assessment – Archaeology.*

It is noted that the Alternative 2 route as depicted in the AIA, is the preferred route as shown in the dBAR. A total of four heritage resources were identified within the road realignment route. These heritage resources were rated as sites of low heritage significance. These include two Early Stone Age (ESA) and two Later Stone Age (LSA) sites.

Recommendations provided in the report include the following:

- An assessment of the likelihood of fossil occurrence within the development footprint should be obtained from a Palaeontologist; and
- Provision for on-going heritage monitoring in a facility environmental management plan which also provides guidelines on what to do in the event of any major heritage feature being encountered during

# Realignment of a section of The MN73 to Accomodate Solar Energy Facilities Near Paulputs Substation

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Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 10604

Date: Friday February 17, 2017  
Page No: 2

any phase of the development or operation.

## Interim Comment

A Palaeontological Desktop Study must be completed for the proposed project before further comments can be issued. Additionally, the AIA must be revised to include a map of the proposed road realignment showing the identified heritage resources.

The route of the proposed road must be mapped on the GIS Layer of the SAHRIS application. Currently the entire footprint of the solar reserve is mapped, and this does not reflect the activities under consideration.

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

---

John Gribble  
Manager: Maritime and Underwater Cultural Heritage Unit / Acting Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

---

**ADMIN:**

# Realignment of a section of The MN73 to Accomodate Solar Energy Facilities Near Paulputs Substation

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Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 10604

Date: Friday February 17, 2017  
Page No: 3

Direct URL to case: <http://www.sahra.org.za/node/385273>  
(DENC, Ref: )

**ENVIRONMENTAL IMPACT ASSESSMENT PROCESS**  
**PUBLIC PARTICIPATION PROCESS**  
**REALIGNMENT OF THE MN73 TO ACCOMMODATE SOLAR ENERGY FACILITIES NEAR PAULPUTS**  
**SUBSTATION, NORTHERN CAPE PROVINCE**  
**INTERESTED AND AFFECTED PARTY REGISTRATION AND COMMENT SHEET**

Return completed reply form to: **Gabriele Wood** of **Savannah Environmental (Pty) Ltd**

Fax: 086 699 5796

Phone: 011 6563237

E-mail: gabriele@savannahsa.com

Postal Address: P O Box 148 Sunninghill 2157

**Please provide your complete contact details:**

Name & Surname:

Jaco Roclofse

Organisation & Designation:

Department of Roads and Public works M.C

Postal Address:

PO Box 3132

Kimberley 8301

Telephone:

0538392100

Cellphone:

0768116206

Fax:

0538619683

E-mail:

roclofse.j@vodamail.co.za

**Would you like to register as an interested and affected party (I&AP)?** YES  NO

(please tick the relevant box)

Note: Please register as an I&AP to receive further correspondence regarding the EIA process for the project. Once registered on the project database, your contact details MAY be included in public documentation.

**Please state your interest in the project** (add additional pages if necessary):

Road 0673 (MN73) is a public provincial proclaimed road under the jurisdiction of the DRPW. Any developments undertaken within the road reserve or within the 95m from the E of 0673..

**Please list your questions, views or concerns regarding the project** (add additional pages if necessary):

The applicant must submit detailed designs produced by an ECSA registered Engineer for approval prior to any construction activities..

**Please provide contact details of other persons who you regard as a potential interested or affected party:**

Name & Surname:

--

Organisation & Designation:

--

Postal Address:

--

Telephone:

--

Cellphone:

--

Fax:

--

E-mail:

--





the denc

Department:  
Environment & Nature Conservation  
NORTHERN CAPE PROVINCE  
REPUBLIC OF SOUTH AFRICA

SASKO Building  
90 Long Street  
Private Bag X6102  
Kimberley  
8300

Tel. 053-8077300  
Fax: 053-8077328

Enquiries :  
Dipatlisiso : O. Ndzumo  
Imibuzo : P. Cloete  
Navrae :  
Reference : NC/BA/06/NAM/KHA/PAU1/2017  
Tshupelo :  
Isalathiso :

Date :  
Leshupelo :  
Umhla : 30 March 2017  
Datum :

ATTENTION: Thalita Botha  
Savannah Environmental Consultant  
P.O Box 148  
Sunninghill  
2157

Email: thalita@savannahsa.com

Dear Madam

**APPLICATION OF ENVIRONMENTAL AUTHORISATION: GNR 983:  
ACTIVITIES: 12,19,24 & GNR 985: ACTIVITY: THE PROPOSED  
REALIGNMENT OF A SECTION OF THE MN73 TO ACCOMMODATE  
SOLAR ENERGY FACILITY NEAR PAULPUTS SUBSTATION, NEAR  
ONSEEPKANS, KHAI-MA LOCAL MUNICIPALITY, NAMAKWA DISTRICT  
MUNICIPALITY, NORTHERN CAPE PROVINCE.**

This Department has evaluated the basic assessment report for the above-mentioned proposed project and has the following comments:

- The closest memorial site is 370 but buffer to be 10m, no memorial sites within the 40m corridor
- Is the Memorial site below Ysterberg excluded from development footprint?
- Will the species that utilise the route as a migration route not be affected by the activity?
- How much of natural vegetation clearance will occur on site?.
- What protected plant species are onsite and what legislation protects them?.
- Flora and fauna onsite must also be classified in accordance with the NCNCA 9 OF 2009 and their status.
- Comments from DW&S with regards to impacts on the drainage lines
- Exclusion of sensitive areas such as rocky outcrops is supported.

- What will be the impact of the activity on the species utilising the migration route?
- The No-Go option is not about you desiring it or a matter of preference but about the status quo of the site, which is something that must be investigated and used as a baseline to assess potential impacts.
- Where there are no alternatives, the motivation for not having feasible alternatives needs to be very clear.
- Under App E6, did not see comments from DW&S, a follow up must be done on the issue of drainage lines raised by DW&S as to whether are there certain requirements from their side.
- According to the Vegetation Map of South Africa (2009) the development falls within the **Bushmanland Arid Grassland**. The Bushmanland Arid Grassland has a conservation target of 21% and only small patches are statutorily conserved in Augrabies Falls National Park and Goegap Nature Reserve. Very little of the area has been transformed. Erosion is very low (60%) and low (33%) (Mucina & Rutherford, 2006)
- The farm Scuitklip falls within an area earmarked by the Northern Cape Biodiversity Sector Plan (NBS) as a Critical Biodiversity Area (CBA) (see Figure 1). The proposed development is positioned in the landscape at a point where it falls within an area determined by the NBS as an Ecological Support Area (ESA). The latter are defined as "areas meeting ecological process targets or achieving biodiversity persistence objectives". This specific ESA is a Terrestrial Migration Corridor. The Scuitklip also border an Important Bird Area (IBA) and the entire area are located within the Gariiep Centre of Endemism (see Figure 2).

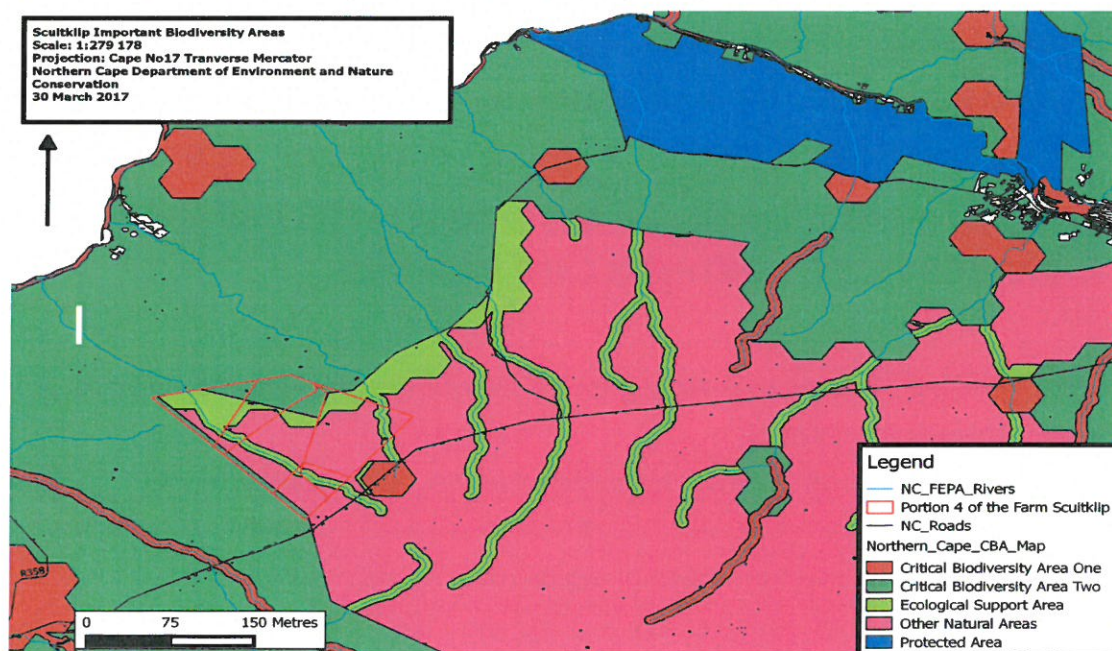


Figure 1: Northern Cape Critical Biodiversity Areas with regards to Scuitklip Farm.



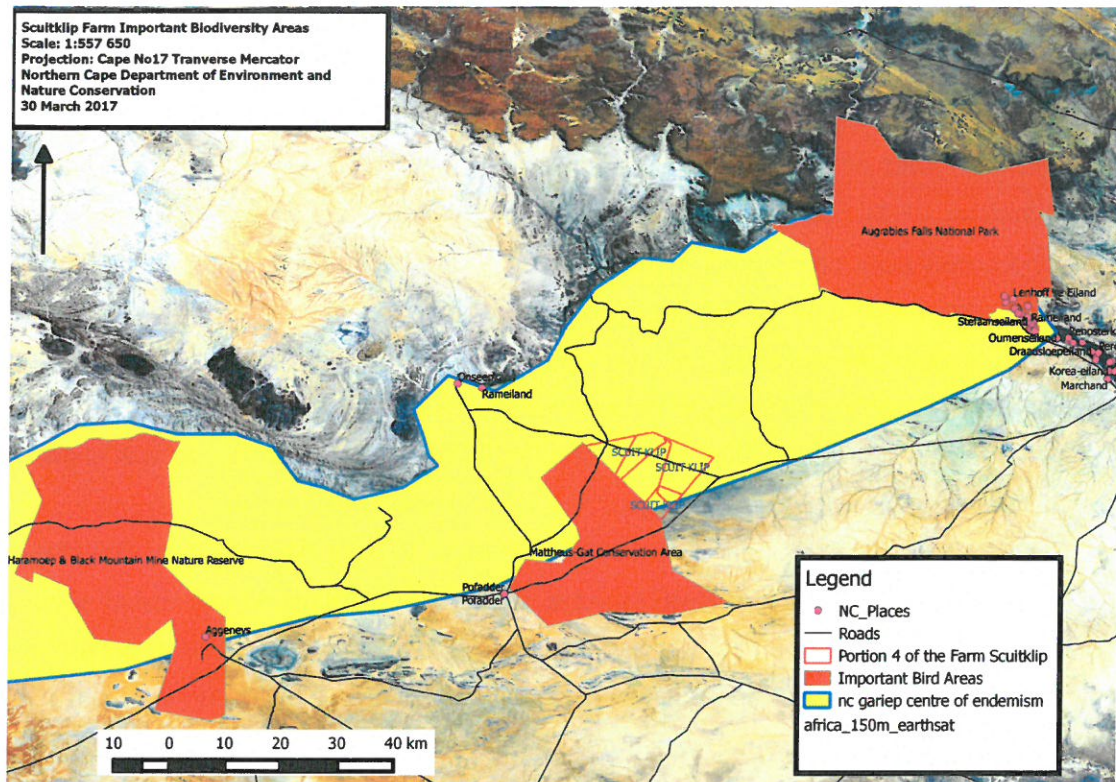


Figure 2: Important Biodiversity Areas with regards to Farm Scuitklip

- The ecological report outlined habitats that are suitable for the occurrence of certain flora species, listed under the IUCN red data list as well as other legal frameworks e.g. Northern Cape Nature Conservation Act No. 109 of 2009. One of the vulnerable species, *Aloidendron dichotomum* (formerly *Aloe dichotoma* var. *dichotoma*) was recorded on Portion 4 of the Farm Scuitklip 92. If the *Aloidendron dichotomum* species are found within the development footprint, the road should be aligned in a way not to disturb the *A. dichotomum* spp., hence, colonies of *A. dichotomum* species should be regarded as a no-go area.
- Disturbance to indigenous plants should be kept to a minimum as far as possible. Re-planting in the wild must cause as little disturbance as possible to the existing natural ecosystems. The substantial amount of *Boschia* spp. destroyed/cut/damage in the development footprint is of great concern. A species conservation assessment will be requested during permit application for *Boschia* spp.
- Rocky ridges, quartzite patches and washes should be demarcated as no-go areas; these areas are known to contain specialist plant species.
- Protected trees with significant biodiversity features such as sociable weaver nests, nest for raptors such as Jackal buzzard, etc. should only be disturbed after consultation with the DENC. Fauna permits should be applied for if any faunal species are to be removed, this includes bird nests, snakes, ground squirrels, etc.
- The most important aspects to consider in removing topsoil are the depth of soil to remove and the conditions of storing topsoil. Studies on topsoil storage in Namaqualand suggested that the top 5cm of the soil contains 90% of the seed bank (de Villiers et al., 1994; de Villiers,

2000). According to (Strohmayr, 1999; Schmidt, 2002), "topsoil should be stored at less than 1m deep for less than 1 month". As a recommendation, the topsoil should be treated with optimal care as it is vital for rehabilitation.

- Another effect of roads is the edge enhancement of plants and herbivores (Lightfoot and Whitford, 1991). Perennial plants along the roadside are often larger than those farther away, and annual plant germination is often greatest along the shoulders of roads. It is possible the increased runoff due to the impervious pavement or compacted soil contributes to this heterogeneity of vegetation in relationship to a road. Although this situation suggests potentially beneficial impacts for herbivorous species, such as tortoises, hares, small antelopes and reptiles, it increases their chance of being killed by vehicle strikes, as was shown by von Seckerdorf Hoff and Marlow (2002).
- Monitoring programmes specified in the EMP must be implemented. It is vital that a clear monitoring and reporting protocol is put in place. The EMP must address issues such as road killings, dust suppression techniques, noise control, storage, and disposal of general waste as well as how provision of ablution and other facilities will be dealt with during construction.
- Water is a scarce resource within the Northern Cape Province and can therefore not be wasted. It is very important that the proponent take this into account. The proponent is thus advised to put sustainable measures of water use in place for dust suppression during the construction phase.

Please do not hesitate to call on 027718 8800 if you need any further information.

Yours truly,



---

**Candidate Scientist: Ecologist**

**Mr. P. Cloete**



---

**Ms O. Ndzumo: Environmental Officer**

**onyndzumo@gmail.com**

# Realignment of a section of The MN73 to Accomodate Solar Energy Facilities Near Paulputs Substation

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an agency of the  
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www.sahra.org.za

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: nhiggitt@sahra.org.za  
CaseID: 10604

Date: Thursday April 06, 2017  
Page No: 1

## Final Comment

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

Attention: Northern Cape- Department of Roads and Pulic Works

**In order to accommodate the planned solar energy facilities in the vicinity of the Paulputs Substation, a realignment of a section of the MN73 is required and will entail the construction of a new section of road ~4km in length and ~7m wide (with a road reserve of 20m) according to approved Northern Cape Department of Roads and Public Works (NC DR&PW) plans and standards; and the decommissioning of ~3km of the existing MN73 road as and where required after commissioning the realigned section. Portions of the decommissioned section of the MN73 road will not be rehabilitated where these are used to provide internal access for the Paulputs CSP Facility.**

Savannah Environmental (Pty) Ltd was appointed by the Northern Cape Department of Roads and Public Works to conduct an Environmental Authorisation Application for the proposed realignment of a section of the MN73 near the Paulputs Substation, Northern Cape Province. A draft Basic Assessment Report (dBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations 2014. The proposed development will entail the realignment of the MN73 to avoid the authorised Paulputs CSP development. A new section of road ~4 km in length and ~7 m wide will be constructed. The McGregor Museum Department of Archaeology was appointed to conduct the Archaeological Impact Assessment (AIA) for the project.

In an Interim Comment issued by SAHRA on the 17/02/2017, SAHRA requested that the AIA be revised to include a map of the identified heritage resources in relation to the proposed road realignment, and that a Palaeontological Desktop Study must be completed for the project. Mr. John Pether was appointed to conduct the Palaeontological Desktop Study.

*Pether, J. 2017. Palaeontological Assessment Status: Realignment of a section of the road MN73 to accommodate the new Paulputs Concentrated Solar Power Tower Facility and Pofadder Thermal Solar Plant.*

The proposed road realignment is underlain by igneous and metamorphic rocks of the Namaqua-Natal Metamorphic Province which are entirely unfossiliferous. The road realignment traverses scree, gravelly soils, aeolian cover and drainage plain gravels which are poorly fossiliferous which have low palaeontological potential and sensitivity. Any fossil finds in the area will be of considerable importance.

Fossil Finds Procedures have been included in the report which must be adhered to and form part of the Environmental Management Programme (EMPr).



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Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 10604

Date: Thursday April 06, 2017  
Page No: 2

## Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) unit accepts the recommendations of the HIA and Desktop Palaeontological Assessment. The recommendations of the heritage specialists and the following conditions must be included in the EMPr:

- The outstanding map as requested in Interim Comments dated 17/02/2017 must be submitted to the case for completeness;
- A Heritage Monitoring Programme must be developed and implemented as part of the EMPr;
- 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/John Gribble 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. 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; and
- If the development receives an Environmental Authorisation (EA), SAHRA must be informed and all documents pertaining to the EA must be uploaded to the SAHRIS Case file.

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

# Realignment of a section of The MN73 to Accomodate Solar Energy Facilities Near Paulputs Substation

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CaseID: 10604

Date: Thursday April 06, 2017  
Page No: 3

---

John Gribble  
Manager: Maritime and Underwater Cultural Heritage Unit / Acting Manager: Archaeology, Palaeontology and  
Meteorites Unit  
South African Heritage Resources Agency

---

## ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/385273>  
(DENC, Ref: )

## 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.