

**APPENDIX 5**  
**COMMENTS RECEIVED**

The bottom of the page features a decorative graphic consisting of several overlapping geometric shapes. On the left, a large grey triangle points downwards. To its right, a red triangle points upwards. Further right, a light grey triangle points downwards. At the bottom right, another red triangle points upwards. These shapes create a dynamic, abstract composition.

COMMENTS FROM: ORGANS OF STATE



**the sandf**

Department:  
Defence:  
REPUBLIC OF SOUTH AFRICA

Telephone: [REDACTED]  
Facsimile: [REDACTED]  
E-Mail: [REDACTED]@dod.mil.za  
Enquiries: Maj Gen M.P. Shashape

CMIS DIV/R/401/1/3/11/3

CMIS Division  
Private Bag X 161  
Pretoria  
0001

20 July 2023

**CMIS DIVISION SPECTRUM MANAGEMENT LETTER OF NO OBJECTION ACCORDING TO SECTION 29 OF THE ELECTRONIC TELECOMMUNICATIONS ACT 36 OF 2005: APPLICATIONS RECEIVED FOR ESTABLISHMENT OF RENEWABLE SOLAR AND WINDFARM ENERGY FACILITIES (PART 2)**

- Reference A: The development of two separate solar photovoltaic (PV) facilities, each with a generating capacity of up to 240MW and associated infrastructures is proposed on remaining extent of the Farm Hartebeest Vlei 86 located approximately 14km southeast of Aggeneys, within the Khâi-Ma Local Municipality and the Namakwa District Municipality, Northern Cape Province. The facilities are to be known as Letsoai PV1 Facility and Letsoai PV2 Facility dd 21 June 2023
- B: Machadodorp1 PV Project (Pty) Ltd proposes to make an amendment to an existing Environmental Authorisation (EA) for the proposed construction of the 14MW Machadodorp PV 1 Solar Energy Facility on Portion 8 of the farm De Kroon 363 of the Emakazheni Local Municipality in Mpumalanga Province dd 13 July 2023
- C: Boesmanland Solar Farm (Pty) Ltd has requested an amendment to an existing Environmental Authorisation (EA) for the authorised Boesmanland Solar Farm and associated infrastructure (DFFE Reference: 14/12/16/3/3/2/222, EA issued on the 16 July 2013). The project is located on a portion of Portion 6 (a portion of Portion 2) of Farm 62 Zuurwater, Aggeneys, within the Khâi-Ma Local Municipality in the Northern Cape Province dd 7 July 2023
- D: A consortium comprising of Akuo Energy Afrique, Africoast Investments and Golden Sunshine Trading propose to develop a cluster of renewable energy facilities and associated electrical infrastructure approximately 20km north of Philipstown and 30km west of Petrusville located in the Renosterberg Local Municipality and within the greater Pixley ka Seme District Municipality, Northern Cape Province. The Project is known as Crossroads Green Energy (Phase 1). Phase 1 entails the development of up to nine (9) solar energy facilities and associated infrastructure.



The entire development will include up to twenty-one (21) solar energy facilities and associated infrastructure dd 29 May 2023

- E: Aberdeen Wind Facility 1 (Pty) Ltd submitted the Final Basic Assessment report in support of an application for Environmental Authorisation (EA) to the Department of Forestry, Fisheries and the Environment (DFFE) on 28 April 2023 for the development of the 240MW Aberdeen Wind Facility 3 located near Aberdeen in the Dr. Beyers Naudé Local Municipality, within the Sarah Baartman District Municipality, Eastern Cape Province dd 28 June 2023
- F: Aberdeen Wind Facility 2 (Pty) Ltd submitted the Final Basic Assessment report in support of an application for Environmental Authorisation (EA) to the Department of Forestry, Fisheries and the Environment (DFFE) on 28 April 2023 for the development of the 240MW Aberdeen Wind Facility 3 located near Aberdeen in the Dr. Beyers Naudé Local Municipality, within the Sarah Baartman District Municipality, Eastern Cape Province dd 28 June 2023
- G: Aberdeen Wind Facility 3 (Pty) Ltd submitted the Final Basic Assessment report in support of an application for Environmental Authorisation (EA) to the Department of Forestry, Fisheries and the Environment (DFFE) on 28 April 2023 for the development of the 240MW Aberdeen Wind Facility 3 located near Aberdeen in the Dr. Beyers Naudé Local Municipality, within the Sarah Baartman District Municipality, Eastern Cape Province dd 28 June 2023
- H: The development of the Wind Garden Wind Farm with a contracted capacity of up to 129MW which will include up to 23 wind turbines has been proposed to be developed near Makhanda within the Cookhouse Renewable Energy Development Zone (REDZ), Sarah Baartman District Municipality, Eastern Cape Province, has reference.
- I: Forethought Capital (Pty) Ltd has identified a site in the Capricorn District Municipality, Limpopo Province, which seems suitable for the development and construction of the Gilimberg Solar PV farm on the farm Gilimberg, 861 Portion 0, along with its associated infrastructure.
- J: Greenbushes RE Project SPV (Pty) Ltd is proposing the development of a Solar PV Facility to generate approximately 15MW and associated infrastructure located on Remainder Portion 8 (Portion of Portion 3) of the Farm Kuyga No. 8, located in the Greenbushes area of Gqeberha, in Ward 40, Nelson Mandela Bay Municipality, Eastern Cape.

## SITUATION

1. Requirements received from Log Division (Facilities Management) for References A to J, dated May 2023 and requires Request for Comments for applications to establish Commercial Solar Photovoltaic (PV) Energy and Wind Energy Facilities (WEF) from Independent Power Supply service providers, refer.

## AIM

2. The aim of this document is to indicate that the CMIS Division has ***No Objection as per the Defence Compliance Statement within Government Gazette 43110 dd 20 March 2020*** due to the possible influence of Electro-Magnetic Interference and Section 29 of the Electronic

Communications Act (Act 36 of 2005), on DOD Communication systems wrt the development of Commercial Solar Photovoltaic (PV) energy and Wind energy power facilities as received in References A to J in this response.

### EVALUATION CRITERIA

3. Potential Impact on DOD Communication Installations. The Command Management Information Systems Division (CMIS Div), in order to confirm any Electro-Magnetic Interference (EMI) on Department of Defence Telecommunication Infrastructure in the area has used existing point-to-point parameters and geolocation to determine any influences on Department of Defence telecommunication systems.
4. The location of DOD communication sites in the areas where confirmed and the following criteria was used as basis for evaluation:
  - a. Influence on line of site (LOS) between DOD communication sites.
  - b. The application of energy facilities fall outside of the 5km – 10km buffer for UHF and Microwave communication sites and will have no electro-magnetic influences.
  - c. If the Wind or PV energy facility is below the line of site (LOS) of DOD links; ie in valleys and other topographical buffers.
  - d. Current and other telecommunication infrastructure in the proposed areas.
  - e. Consideration of other existing communication sites in the area.
5. Preventative Measures. Each DOD communication site has been allocated a “safe-zone” buffer, according to the systems that are employed for DOD communication networks.
  - a. UHF command and control radio networks (5km buffer-zone).
  - b. Voice and data services via Microwave (10 km buffer-zone) and Radar 15 km buffer-zone.
6. The roles and responsibilities of CMIS Division Spectrum Management during the assessment are:
  - a. Represent the CMIS Division during coordination meetings / workgroups and discussions.
  - b. Confirm the applicable regulations and ensure that all parties comply with all the applicable legislations.
  - c. Ensure that the interests of the SANDF and its communication systems are protected, without any harmful interference.
  - d. Perform a spectrum analysis bmo test instrumentation (Radio Spectrum Analyser).

### CONCLUSION

7. It was found that there will be **No Objection** as per the Defence Compliance Statement, within Government Gazette 43110 dd 20 March 2020 or Electro-Magnetic Interference from the proposed sites of the applicants, due to “off-site” power gathering and distribution on existing Power transmission lines and therefore No Objection from CMIS Division wrt the development planned at the specified locations as indicated in References A to J.

**CMIS DIVISION SPECTRUM MANAGEMENT LETTER OF NO OBJECTION ACCORDING TO SECTION 29 OF THE ELECTRONIC TELECOMMUNICATIONS ACT 36 OF 2005: APPLICATIONS RECEIVED FOR ESTABLISHMENT OF RENEWABLE SOLAR AND WINDFARM ENERGY FACILITIES (PART 2)**

8. The letters-of-no-objection for in terms of the ECA, Act 36 of 2005 on the part of the DOD should not be deemed to substitute or replace any other statutory approvals to be obtained by the applicants, as it only reflects the consent for Telecommunication systems.
9. For your further action.

  
(M.P. SHASHAPE)

**CHIEF OF COMMAND AND MANAGEMENT INFORMATION SYSTEMS: MAJ GEN**

**DISTR**

For Action

C Log Directorate Facilities	
D FAC	(Attention: Brig Gen L.C. Kekana)
GOC Defence Works Formation	
D Defence Works Operations	(Attention: Brig Gen N.J. January)
C Log MIEM	(Attention: Capt (SAN) A. Liebenberg)
C Log D Ops	(Attention: Lt Col H.L. Zondi)
	(Attention: Maj L.R. Kenny)

For info

COS SANDF	
C Log	(Attention: Lt Gen X.B. Ndlovu)
GOC Defence Works Formation	
A/DDS CMIS Division	(Attention: Col E.T. Mlilo)
GOC SA Army Signal Formation	(Attention: Brig Gen U.J. Jama)
D CMI Static Systems	(Attention: Brig Gen M.A. Matoeka)
SSO PSM ICT Infrastructure	(Attention: Col M.D. Smit)

Internal

Daily File  
File: CMIS DIV/R/401/1/3/11/3

COMMENTS FROM: LOCAL LANDOWNERS

# Starstop Machado Operations (Pty) Ltd

Registration No.2020/265024/07  
VAT No. 4250291459

PO Box 14010, West Acres, Nelspruit, 1211  
Telephone: (013) 880 0939  
N4 Highway, Farm De Kroon, Machadodorp,  
1170.

15 August 2023

Mr. Cornelius Holtzhausen

Savannah Environmental

Email: publicprocess@savannahsa.com

Dear Sir,

**COMMENTS : APPLICATION FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (“EA”) FOR THE PROPOSED CONSTRUCTION OF THE 14MW MACHADADORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363 IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to your e-mail of 14 July 2023 confirming our registration as an interested and affected party and herewith submit our comments on the matter.

Starstop Machado Operations (Pty) Ltd is the Freshstop and Steers Franchisee at Starstop Millys, situated on Portion 14 of the Farm De Kroon 363 JT.

Applications for Amendment of Environmental Authorisation (14/12/16/3/3/1/738) : April 2016, April 2018, May 2022 and May 2023

The applications fail to recognise and do not account for :

- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Machado Rainbow Trout (Pty) Ltd to Pine Glow Investments (Pty) Ltd on 9 December 2015, where the 2016, 2018 and 2022 Applications for Amendment of the Environmental Authorisation improperly, or possibly fraudulently, reflect Machado Rainbow Trout (Pty) Ltd as the land owner, whereas Pine Glow Investments (Pty) Ltd was the registered land owner.
- The sale of Portion 22 of the Farm De Kroon 363 JT (3.9475 ha) to SANRAL for inclusion in the N4 road reserve, which portion was created by subdivision of the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT (Sub Divisional Diagram SG537/2019).
- The subdivision of the Remaining Extent of Portion 8 of The Farm De Kroon 363 JT, which created Portion 20 of the Farm De Kroon 363 JT (7.0054 ha).
- The change of ownership of Portion 20 of the Farm De Kroon 363 JT from Pine Glow Investments (Pty) Ltd to Leroma Properties (Pty) Ltd on 26 April 2021.
- The establishment of Milly’s South Township on Portion 20 of the Farm De Kroon 363 JT and the resultant amendment of land use rights.

Directors: A.M. le Roux ; K. Klopper






- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Pine Glow Investments (Pty) Ltd to Milly's Properties on 24 April 2023.

### Visual Impact

- The Visual Impact Index Map in the July 2023 Visual Assessment conducted by LOGIS reflects that Portion 14 of the Farm De Kroon 363 JT is situated in a zone which will experience a potentially very high magnitude visual impact as a result of the development of the proposed Solar Energy Facility.
- The author of the 2023 report claims that the affected environment as described in the 2012 Visual Impact Assessment remains largely unchanged, even though the 2012 report disregarded Portion 14 of the Farm De Kroon 363 JT for assessment of visual impact as a result of the development of the proposed Solar Energy Facility.
- The author of the 2023 report claims that the "land use zonation" of the larger study area remains agricultural, which is not true as the zoning of Portion 14 of the Farm De Kroon 363 JT is Mixed Use allowing, inter alia, for a Filling Station as permitted use.
- The author of the report claims that in spite of the fact that some of the additional receptor sites (which includes Portion 14 of the Farm De Kroon 363 JT) may experience visual impacts of very high magnitude, these impacts may only be of moderate significance, due to none of the recipient sites (e.g. adjacent land owners) raising any objection to the proposed development.
- The author however fails to disclose that the only reason why Starstop Machado Operations (Pty) Ltd is not on record as an objector with regards to the proposed Solar Energy Facility, is that it was not aware of the proposed development, nor was it consulted at any time prior to the June 2023 Notice of Part 1 EA Amendment and Public Participation Process.
- The businesses owned by Starstop Machado Operations (Pty) Ltd rely heavily on the fact that the Millys Complex is a tourist attraction. The very high visual impact of the proposed Solar Energy Facility will negatively impact the tourist attraction value of the Millys Complex and therewith the business operations conducted by Starstop Machado Operations (Pty) Ltd.
- We therefore object to the proposed Solar Energy Facility, as no consideration has been given to mitigate the identified very high magnitude visual impact that the proposed Solar Energy Facility will have on Portion 14 of the Farm De Kroon 363 JT and the businesses operated thereon.

Kindly acknowledge receipt hereof.

Sincerely

 15/8) 2023

Kobus Klopper  
Director

# STARSTOP MACHADO FUEL (PTY) LTD

P.O. Box 14107  
West Acres  
Nelspruit  
1211

E-mail: smf@ballwin.co.za  
C: 082 878 0288  
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15 August 2023

Mr. Cornelius Holtzhausen  
Savannah Environmental

Email: publicprocess@savannahsa.com

Dear Sir,

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We refer to your e-mail of 7 July 2023 confirming our registration as an interested and affected party and herewith submit our comments on the matter.

Starstop Machado Fuel (Pty) Ltd is the Caltex Filling Station Franchisee at Starstop Millys, situated on Portion 14 of the Farm De Kroon 363 JT, which forms part of the Millys Complex. Applications for Amendment of Environmental Authorisation (14/12/16/3/3/1/738)

The applications fail to recognise and do not take account of :

- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Machado Rainbow Trout (Pty) Ltd to Pine Glow Investments (Pty) Ltd on 9 December 2015, where the 2016, 2018 and 2022 Applications for Amendment of the Environmental Authorisation improperly, or possibly fraudulently, reflect Machado Rainbow Trout (Pty) Ltd as the land owner, whereas Pine Glow Investments (Pty) Ltd was the registered land owner.
- The sale of Portion 22 of the Farm De Kroon 363 JT (3.9475 ha) to SANRAL for inclusion in the N4 road reserve, which portion was created by subdivision of the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT (Sub Divisional Diagram SG 537/2019).
- The subdivision of the Remaining Extent of Portion 8 of The Farm De Kroon 363 JT, which created Portion 20 of the Farm De Kroon 363 JT (7.0054 ha).
- The change of ownership of Portion 20 of the Farm De Kroon 363 JT to Leroma Properties (Pty) Ltd on 26 April 2021.
- The establishment of Milly's South Township on Portion 20 of the Farm De Kroon 363 JT and the resultant amendment of land use rights.

**Directors: Kobus Klopper**  
**Registration number: 2020/265670/07**



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- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Pine Glow Investments (Pty) Ltd to Milly's Properties (Pty) Ltd on 24 April 2023.

## Visual Impact

- The Visual Impact Index Map in the July 2023 Visual Assessment conducted by LOGIS reflects that Portion 14 of the Farm De Kroon 363 JT is situated in a zone which will experience a potentially very high magnitude visual impact as a result of the development of the proposed Solar Energy Facility.
- The author of the 2023 report claims that the affected environment as described in the 2012 Visual Impact Assessment remains largely unchanged, even though the 2012 report disregarded that Portion 14 of the Farm De Kroon 363 JT for assessment of visual impact as a result of the development of the proposed Solar Energy Facility.
- The author of the 2023 report claims that the "land use zonation" of the larger study area remains agricultural, which is not true as the zoning of Portion 14 of the Farm De Kroon 363 JT is Mixed Use allowing, inter alia, for a Filling Station as permitted use.
- The author of the report claims that despite the fact that some of the additional receptor sites (which includes Portion 14 of the Farm De Kroon 363 JT) may experience visual impacts of very high magnitude, these impacts may only be of moderate significance, due to none of the recipient sites (e.g. adjacent land owners) raising any objection to the proposed development.
- The author however fails to disclose that the only reason why Starstop Machado Fuel (Pty) Ltd is not on record as an objector with regards to the proposed Solar Energy Facility, is that it was not aware of the proposed development nor was it consulted at any time prior to the June 2023 Notice of Part 1 EA Amendment and Public Participation Process.
- The fuel retailing business operated on Portion 14 of the Farm De Kroon 363 JT relies heavily on the fact that the Millys Complex is a tourist attraction. The very high visual impact of the proposed Solar Energy Facility will negatively impact the tourist attraction value of the Millys Complex and therewith the business operations conducted thereon.

**Directors: Kobus Klopper**  
**Registration number: 2020/265670/07**



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- We therefore object to the proposed Solar Energy Facility, as no consideration has been given to mitigate the identified very high magnitude visual impact that the proposed Solar Energy Facility will have on Portion 14 of the Farm De Kroon 363 JT and the businesses operated thereon.

Kindly acknowledge receipt hereof.

Sincerely

Kobus Klopper  
Director

  
15/8/2023

Pine Glow Investments (Pty) Ltd / trading as  
Caltex Mpumalanga North Marketer

5 Van Rensburg Street, Proforum Building, 1st Floor, Nelspruit, 1201  
PO Box 140 [REDACTED], Nelspruit, 1211  
Share Call [REDACTED] Telephone + [REDACTED] Fax + [REDACTED]



**CALTEX**

MPUMALANGA NORTH MARKETER

15 August 2023

Mr. Cornelius Holtzhausen

Savannah Environmental

Email: publicprocess@savannahsa.com

Dear Sir,

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We refer to your letter of 13 July 2023 confirming our registration as an interested and affected party and herewith submit our comments on the matter.

Pine Glow Investments (Pty) Ltd, trading as Caltex Mpumalanga North Marketer, is the Sub-Lessee of Portion 14 of the Farm De Kroon 363 JT and the Franchisor of the Caltex Starstop Millys.

Pine Glow Investments (Pty) Ltd was the registered owner of the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT from 9 December 2015 to 24 April 2023.

Applications for Amendment of Environmental Authorisation (14/12/16/3/3/1/738) : April 2016, April 2018, May 2022 and May 2023

The applications fail to recognise and do not take account of :

- The period during which Pine Glow Investments (Pty) Ltd was the owner of the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT, where the 2016, 2018 and 2022 Applications for

Directors N Omar, TH le Roux (Managing Director), AM le Roux, MI Omar  
Registration No. 2010/007287/07 VAT Registration No. 4250258730

**IT'S HOW YOU GET THERE**



**CALTEX**

Amendment of the Environmental Authorisation improperly, or possibly fraudulently, reflect Machado Rainbow Trout (Pty) Ltd as the land owner, whereas Pine Glow Investments (Pty) Ltd was the registered land owner.

- The sale of Portion 22 of the Farm De Kroon 363 JT (3.9475 ha) to SANRAL for inclusion in the N4 road reserve, which portion was created by subdivision of the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT (Sub Divisional Diagram SG 537/2019).
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- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Pine Glow Investments (Pty) Ltd to Milly's Properties on 24 April 2023.
- We submitted a query to Savannah Environmental in which we questioned the validity and legality of the Amendments of Environmental Authorisation that were applied for and granted during 2016, 2018 and 2022 absent the consent of the registered land owner, which was Pine Glow Investments (Pty) Ltd, but to date, we have not received an answer.

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- The businesses operated on Portion 14 of the Farm De Kroon 363 JT rely heavily on the fact that the Millys Complex is a tourist attraction. The very high visual impact of the proposed Solar Energy Facility will negatively impact the tourist attraction value of the Millys Complex and therewith the business operations conducted thereon.
- We therefore object to the proposed Solar Energy Facility, as no consideration has been given to mitigate the identified very high magnitude visual impact that the proposed Solar Energy Facility will have on Portion 14 of the Farm De Kroon 363 JT and the businesses operated thereon.

Kindly acknowledge receipt hereof.

Sincerely



Raymond Nell

General Manager : Property and Brand Development



Pine Glow Investments (Pty) Ltd / trading as  
Caltex Mpumalanga North Marketer

5 Van Rensburg Street, Proforum Building, 1st Floor, Nelspruit, 1201  
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MPUMALANGA NORTH MARKETER

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Directors N Omar, TH le Roux (Managing Director), AM le Roux, MI Omar  
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Raymond Nell

General Manager : Property and Brand Development



15 August 2023

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Leroma Properties (Pty) Ltd is the owner of Erf 3 Milly’s South Township, which is immediately adjacent to the Remaining Extent of Portion 8 of the Farm 363 JT and the proposed Solar Energy Facility thereon.

Leroma Investments (Pty) Ltd is a Grantee in respect of Notarial Deed of Servitude K170/2023S, which is registered against the title deed (T3252/2023) of the Remaining Extent of Portion 8 of the Farm de Kroon 363 JT on which the Solar Energy Facility is proposed.

Applications for Amendment of Environmental Authorisation (14/12/16/3/3/1/738) : April 2016, April 2018, May 2022 and May 2023

The applications fail to recognise and do not take account of :

- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Machado Rainbow Trout (Pty) Ltd to Pine Glow Investments (Pty) Ltd on 9 December 2015, where the 2016, 2018 and 2022 Applications for Amendment of the Environmental Authorisation improperly, or possibly fraudulently, reflect Machado Rainbow Trout (Pty) Ltd as the land owner, whereas Pine Glow Investments (Pty) Ltd was the registered land owner.
- The sale of Portion 22 of the Farm De Kroon 363 JT (3.9475 ha) to SANRAL for inclusion in the N4 road reserve, which portion was created by subdivision of the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT (Sub Divisional Diagram SG 537/2019).
- The subdivision of the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT, which created Portion 20 of the Farm De Kroon 363 JT (7.0054 ha).

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- The July 2023 Visual Assessment conducted by LOGIS reflects that Erf 3 Milly's South Township, which the author incorrectly describes as part of the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT, is situated in a zone which according to the report's Visual Impact Index Map will experience a potentially high magnitude visual impact as a result of the development of the proposed Solar Energy Facility.
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- The author, however, fails to disclose that the only reason why Leroma Properties (Pty) Ltd is not on record with regards to the proposed Solar Energy Facility, is that it was not aware of the proposed development, nor was it consulted at any time prior to the June 2023 Notice of Part 1 EA Amendment and Public Participation Process.
- The high visual impact of the proposed Solar Energy Facility will most likely negatively impact the proposed business operations to be conducted on Erf 3 Milly's South Township. This will diminish the income potential from Erf 3 Milly's South Township and consequently diminish its property value.
- We therefore object to the proposed Solar Energy Facility, as no consideration has been given to mitigate the identified high magnitude visual impact that the proposed Solar Energy Facility will have on Erf 3 Milly's South Township and the businesses to be operated thereon.



## Notarial Deed of Servitude K170/2023S

- The determination of the disposal area for treated effluent through irrigation on the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT, is subject to the positioning requirements for such an activity as prescribed by the National Water Act, 36 of 1998 and related legislation.
- Consequently, the disposal area for treated effluent through irrigation will be determined by minimum distances from watercourses, wetlands etc. prescribed by the above legislation. The areas of the Remaining Extent of Portion 8 of the Farm De Kroon so designated may not lawfully be deviated from and their designation take precedence over the placement of the proposed Solar Energy Facility.
- The applicant has not given any consideration to the position and extent of the disposal area for treated effluent through irrigation in positioning its proposed Solar Energy Facility.
- The disregard for the registered rights of Leroma Properties (Pty) Ltd (and other Grantees) is unacceptable and we therefore object to the proposed Solar Energy Facility.

Kindly acknowledge receipt hereof.

Sincerely



Raymond Nell

General Manager : Property and Brand Development



15 August 2023

Mr. Cornelius Holtzhausen

Savannah Environmental

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

Dear Sir,

**COMMENTS : APPLICATION FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (“EA”) FOR THE PROPOSED CONSTRUCTION OF THE 14MW MACHADADORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363 IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

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Leroma Properties (Pty) Ltd is the owner of Erf 3 Milly’s South Township, which is immediately adjacent to the Remaining Extent of Portion 8 of the Farm 363 JT and the proposed Solar Energy Facility thereon.

Leroma Investments (Pty) Ltd is a Grantee in respect of Notarial Deed of Servitude K170/2023S, which is registered against the title deed (T3252/2023) of the Remaining Extent of Portion 8 of the Farm de Kroon 363 JT on which the Solar Energy Facility is proposed.

Applications for Amendment of Environmental Authorisation (14/12/16/3/3/1/738) : April 2016, April 2018, May 2022 and May 2023

The applications fail to recognise and do not take account of :

- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Machado Rainbow Trout (Pty) Ltd to Pine Glow Investments (Pty) Ltd on 9 December 2015, where the 2016, 2018 and 2022 Applications for Amendment of the Environmental Authorisation improperly, or possibly fraudulently, reflect Machado Rainbow Trout (Pty) Ltd as the land owner, whereas Pine Glow Investments (Pty) Ltd was the registered land owner.
- The sale of Portion 22 of the Farm De Kroon 363 JT (3.9475 ha) to SANRAL for inclusion in the N4 road reserve, which portion was created by subdivision of the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT (Sub Divisional Diagram SG 537/2019).
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- The registration of servitude K170/2023S against the title deed (T3252/2023) of the Remaining Extent of Portion 8 of the Farm 363 JT, which servitude, inter alia, grants the Grantees the right to convey and discharge treated effluent through irrigation on the Servient Tenement.

### Visual Impact

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- The author of the 2023 report claims that the affected environment as described in the 2012 Visual Impact Assessment remains largely unchanged, even though Erf 3 Milly's South Township did not exist at the time of the 2012 report and was therefore disregarded for assessment of visual impact as a result of the development of the proposed Solar Energy Facility.
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- The author of the report claims that in spite of the fact that some of the additional receptor sites (which includes Erf 3 Milly's South Township) may experience visual impacts of high magnitude, these impacts may only be of moderate significance, due to none of the recipient sites (e.g. adjacent land owners) raising any objection to the proposed development.
- The author, however, fails to disclose that the only reason why Leroma Properties (Pty) Ltd is not on record with regards to the proposed Solar Energy Facility, is that it was not aware of the proposed development, nor was it consulted at any time prior to the June 2023 Notice of Part 1 EA Amendment and Public Participation Process.
- The high visual impact of the proposed Solar Energy Facility will most likely negatively impact the proposed business operations to be conducted on Erf 3 Milly's South Township. This will diminish the income potential from Erf 3 Milly's South Township and consequently diminish its property value.
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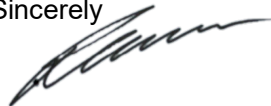


## Notarial Deed of Servitude K170/2023S

- The determination of the disposal area for treated effluent through irrigation on the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT, is subject to the positioning requirements for such an activity as prescribed by the National Water Act, 36 of 1998 and related legislation.
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Kindly acknowledge receipt hereof.

Sincerely



Raymond Nell

General Manager : Property and Brand Development







# LEROMA INVESTMENTS (Pty) Ltd

5 Van Rensburg Street, [REDACTED]

P.O. Box 14010, West Acres, 1211

15 August 2023

Mr. Cornelius Holtzhausen

Savannah Environmental

Email: publicprocess@savannahsa.com

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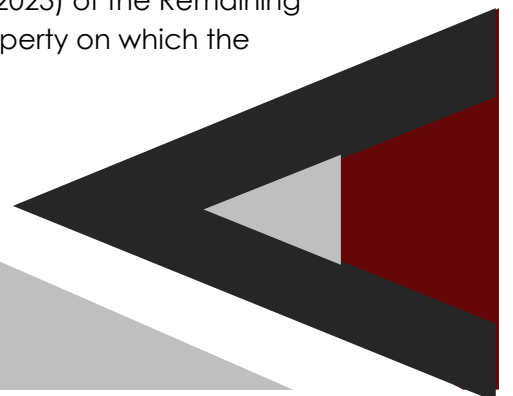
We refer to your letter of 13 July 2023 confirming our registration as an interested and affected party and herewith submit our comments on the matter.

Leroma Investments (Pty) Ltd is the owner of the following properties on which the Millys Complex is situated :

- The Remaining Extent of Portion 11 of the Farm De Kroon 363 JT.
- Portion 14 of the Farm De Kroon 363 JT.
- The Remaining Extent of Portion 13 of the Farm De Kroon 363 JT.

The said properties are collectively referred to as "the Leroma Investments Properties" herein.

Leroma Investments (Pty) Ltd is a Grantee in respect of Notarial Deed of Servitude K170/2023S, which is registered against the title deed (T3252/2023) of the Remaining Extent of Portion 8 of the Farm de Kroon 363 JT, being the property on which the Solar Energy Facility is proposed.



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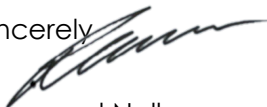
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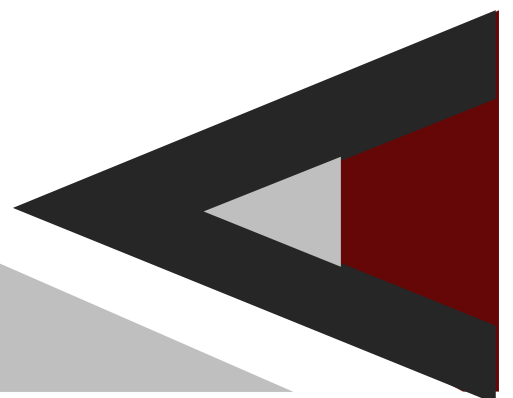
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Sincerely



Raymond Nell

General Manager : Property and Brand Development





# LEROMA INVESTMENTS (Pty) Ltd

5 Van Rensburg Street, N [REDACTED]

P.O. Box 14010, West Acres, 1211

15 August 2023

Mr. Cornelius Holtzhausen

Savannah Environmental

Email: publicprocess@savannahsa.com

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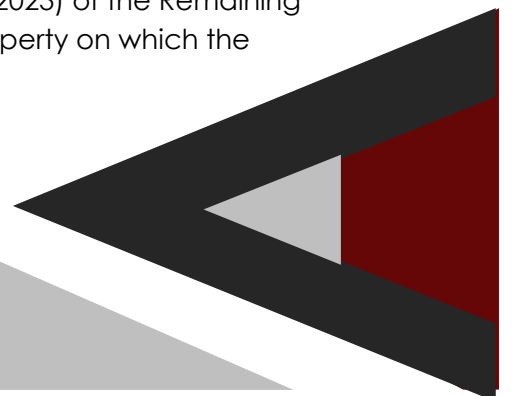
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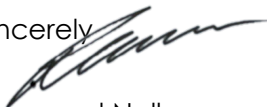
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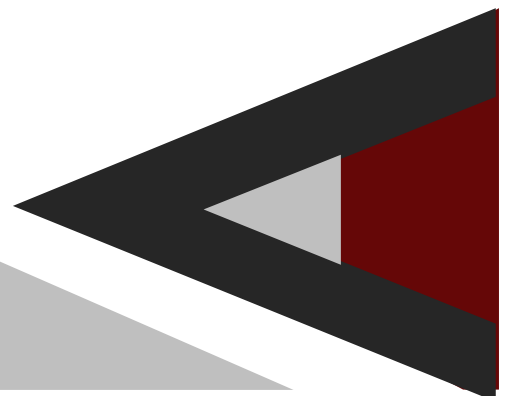
Kindly acknowledge receipt hereof.

Sincerely



Raymond Nell

General Manager : Property and Brand Development





# QSR Machado (Pty) Ltd

Registration No.2020/735329/07  
VAT No: 4670300583

PO Box 1401 [REDACTED] Nelspruit, 1211  
Telephone: [REDACTED]  
Fax: [REDACTED]  
5 van Rensburg street, Nelspruit, 1200

15 August 2023

Mr. Cornelius Holtzhausen  
Savannah Environmental

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

Dear Sir,

**COMMENTS: APPLICATION FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (“EA”) FOR THE PROPOSED CONSTRUCTION OF THE 14MW MACHADADORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363 IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to your e-mail of 3 July 2023 confirming our registration as an interested and affected party and herewith submit our comments on the matter.

QSR Machado Operations (Pty) Ltd is the Mugg & Bean Franchisee at Starstop Millys, situated on Portion 14 of the Farm De Kroon 363 JT, which forms part of the Millys Complex.

Applications for Amendment of Environmental Authorisation (14/12/16/3/3/1/738)

The applications fail to recognise and do not take account of:

- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Machado Rainbow Trout (Pty) Ltd to Pine Glow Investments (Pty) Ltd on 9 December 2015, where the 2016, 2018 and 2022 Applications for Amendment of the Environmental Authorisation improperly, or possibly fraudulently, reflect Machado Rainbow Trout (Pty) Ltd as the land owner, whereas Pine Glow Investments (Pty) Ltd was the registered land owner.
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- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Pine Glow Investments (Pty) Ltd to Milly's Properties (Pty) Ltd on 24 April 2023.

### Visual Impact

- The Visual Impact Index Map in the July 2023 Visual Assessment conducted by LOGIS reflects that Portion 14 of the Farm De Kroon 363 JT is situated in a zone which will experience a potentially very high magnitude visual impact as a result of the development of the proposed Solar Energy Facility.
- The author of the 2023 report claims that the affected environment as described in the 2012 Visual Impact Assessment remains largely unchanged, even though the 2012 report disregarded that Portion 14 of the Farm De Kroon 363 JT for assessment of visual impact as a result of the development of the proposed Solar Energy Facility.
- The author of the 2023 report claims that the "land use zonation" of the larger study area remains agricultural, which is not true as the zoning of Portion 14 of the Farm De Kroon 363 JT is Mixed Use allowing, inter alia, for a Filling Station as permitted use.
- The author of the report claims that despite the fact that some of the additional receptor sites (which includes Portion 14 of the Farm De Kroon 363 JT) may experience visual impacts of very high magnitude, these impacts may only be of moderate significance, due to none of the recipient sites (e.g. adjacent land owners) raising any objection to the proposed development.
- The author however fails to disclose that the only reason why QSR Machado Operations (Pty) Ltd is not on record as an objector with regards to the proposed Solar Energy Facility, is that it was not aware of the proposed development nor was it consulted at any time prior to the June 2023 Notice of Part 1 EA Amendment and Public Participation Process.
- The business owned by QSR Machado Operations (Pty) Ltd relies heavily on the fact that the Millys Complex is a tourist attraction. The very high visual impact of the proposed Solar Energy Facility will negatively impact the tourist attraction value of the Millys Complex and therewith the business operations conducted thereon.
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Energy Facility will have on Portion 14 of the Farm De Kroon 363 JT and the businesses operated thereon.

Kindly acknowledge receipt hereof.

Yours faithfully

A handwritten signature in black ink, appearing to be 'Julian Spang', written in a cursive style. The signature is positioned above the printed name and title.

JULIAN SPANG  
GENERAL MANAGER



## MILLYS TROUT (PTY) LTD

Registration No: 2023/514047/07  
VAT Registration No: 4120309358

PO Box 14010,  
West Acres,  
Nelsp  
Telephone: [REDACTED]  
Farm De Kroon, N4 Highway, Machadodorp, 1770

15 August 2023

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Savannah Environmental

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

Dear Sir,

**COMMENTS: APPLICATION FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (“EA”) FOR THE PROPOSED CONSTRUCTION OF THE 14MW MACHADADORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363 IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to your e-mail of 3 July 2023 confirming our registration as an interested and affected party and herewith submit our comments on the matter.

Millys Trout (Pty) Ltd is the owner of the Trout Factory and Bakery businesses, situated on the Remaining Extent of Portion 13 of the Farm De Kroon 363 JT, which forms part of the Millys Complex.

Applications for Amendment of Environmental Authorisation (14/12/16/3/3/1/738)

The applications fail to recognise and do not take account of:

- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Machado Rainbow Trout (Pty) Ltd to Pine Glow Investments (Pty) Ltd on 9 December 2015, where the 2016, 2018 and 2022 Applications for Amendment of the Environmental Authorisation improperly, or possibly fraudulently, reflect Machado Rainbow Trout (Pty) Ltd as the land owner, whereas Pine Glow Investments (Pty) Ltd was the registered land owner.
- The sale of Portion 22 of the Farm De Kroon 363 JT (3.9475 ha) to SANRAL for inclusion in the N4 road reserve, which portion was created by subdivision of the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT (Sub Divisional Diagram SG 537/2019).
- The subdivision of the Remaining Extent of Portion 8 of The Farm De Kroon 363 JT, which created Portion 20 of the Farm De Kroon 363 JT (7.0054 ha).

- The change of ownership of Portion 20 of the Farm De Kroon 363 JT to Leroma Properties (Pty) Ltd on 26 April 2021.
- The establishment of Milly's South Township on Portion 20 of the Farm De Kroon 363 JT and the resultant amendment of land use rights.
- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Pine Glow Investments (Pty) Ltd to Milly's Properties (Pty) Ltd on 24 April 2023.

### Visual Impact


- The Visual Impact Index Map in the July 2023 Visual Assessment conducted by LOGIS reflects that the entire Milly's Complex (The Remaining Extent of Portion 11, Portion 14 and the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT) is situated in a zone which will experience a potentially very high magnitude visual impact as a result of the development of the proposed Solar Energy Facility.
- The author of the 2023 report claims that the affected environment as described in the 2012 Visual Impact Assessment remains largely unchanged, even though the 2012 report disregarded the Milly's Complex for assessment of visual impact as a result of the development of the proposed Solar Energy Facility.
- The author of the 2023 report claims that the "land use zonation" of the larger study area remains agricultural, which is not true as the zoning of the Remaining Extent of Portion 13 of the Farm De Kroon 363 JT is Mixed Use.
- The author of the report claims that despite the fact that some of the additional receptor sites (which includes the Milly's Complex) may experience visual impacts of very high magnitude, these impacts may only be of moderate significance, due to none of the recipient sites (e.g. adjacent land owners) raising any objection to the proposed development.
- The author however fails to disclose that the only reason why Milly's Trout (Pty) Ltd is not on record as an objector with regards to the proposed Solar Energy Facility, is that it was not aware of the proposed development nor was it consulted at any time prior to the June 2023 Notice of Part 1 EA Amendment and Public Participation Process.
- The businesses owned by Milly's Trout (Pty) Ltd rely heavily on the fact that the Milly's Complex is a tourist attraction as the majority of the products that it produces are sold to the Milly's Restaurant, Milly's Café and Milly's Farmstall. The very high visual impact of the

proposed Solar Energy Facility will negatively impact the tourist attraction value of the Millys Complex and therewith the business operations conducted thereon.

- We therefore object to the proposed Solar Energy Facility, as no consideration has been given to mitigate the identified very high magnitude visual impact that the proposed Solar Energy Facility will have on the Millys Complex and the businesses operated thereon.

Kindly acknowledge receipt hereof.

Yours faithfully



JULIAN SPANG  
GENERAL MANAGER



## MILLYS FARMSTALL (PTY) LTD

Registration No: 2023/004306/07  
VAT Registration No: 4280309354

PO Box 14010,  
West Acres,  
Nelspruit 1201

Telephone: [REDACTED]

Farm De Kroon, N4 Highway, Machadodorp, 1770

15 August 2023

Mr. Cornelius Holtzhausen

Savannah Environmental

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

Dear Sir,

**COMMENTS: APPLICATION FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION ("EA") FOR THE PROPOSED CONSTRUCTION OF THE 14MW MACHADODORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363 IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to your e-mail of 3 July 2023 confirming our registration as an interested and affected party and herewith submit our comments on the matter.

Millys Farmstall (Pty) Ltd is the owner of the Millys Farmstall business, situated on the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT, which forms part of the Millys Complex.

Applications for Amendment of Environmental Authorisation (14/12/16/3/3/1/738)

The applications fail to recognise and do not take account of:

- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Machado Rainbow Trout (Pty) Ltd to Pine Glow Investments (Pty) Ltd on 9 December 2015, where the 2016, 2018 and 2022 Applications for Amendment of the Environmental Authorisation improperly, or possibly fraudulently, reflect Machado Rainbow Trout (Pty) Ltd as the land owner, whereas Pine Glow Investments (Pty) Ltd was the registered land owner.
- The sale of Portion 22 of the Farm De Kroon 363 JT (3.9475 ha) to SANRAL for inclusion in the N4 road reserve, which portion was created by subdivision of the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT (Sub Divisional Diagram SG 537/2019).
- The subdivision of the Remaining Extent of Portion 8 of The Farm De Kroon 363 JT, which created Portion 20 of the Farm De Kroon 363 JT (7.0054 ha).

- The change of ownership of Portion 20 of the Farm De Kroon 363 JT to Leroma Properties (Pty) Ltd on 26 April 2021.
- The establishment of Milly's South Township on Portion 20 of the Farm De Kroon 363 JT and the resultant amendment of land use rights.
- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Pine Glow Investments (Pty) Ltd to Milly's Properties (Pty) Ltd on 24 April 2023.

#### Visual Impact

- The Visual Impact Index Map in the July 2023 Visual Assessment conducted by LOGIS reflects that the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT is situated in a zone which will experience a potentially very high magnitude visual impact as a result of the development of the proposed Solar Energy Facility.
- The author of the 2023 report claims that the affected environment as described in the 2012 Visual Impact Assessment remains largely unchanged, even though the 2012 report disregarded the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT for assessment of visual impact as a result of the development of the proposed Solar Energy Facility.
- The author of the 2023 report claims that the "land use zonation" of the larger study area remains agricultural, which is not true as the zoning of the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT is Mixed Use.
- The author of the report claims that despite the fact that some of the additional receptor sites (which includes the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT) may experience visual impacts of very high magnitude, these impacts may only be of moderate significance, due to none of the recipient sites (e.g. adjacent land owners) raising any objection to the proposed development.
- The author however fails to disclose that the only reason why Millys Farmstall (Pty) Ltd is not on record as an objector with regards to the proposed Solar Energy Facility, is that it was not aware of the proposed development nor was it consulted at any time prior to the June 2023 Notice of Part 1 EA Amendment and Public Participation Process.
- The business owned by Millys Farmstall (Pty) Ltd relies heavily on the fact that the Millys Complex is a tourist attraction. The very high visual impact of the proposed Solar Energy




Facility will negatively impact the tourist attraction value of the Millys Complex and therewith the business operations conducted thereon.

- We therefore object to the proposed Solar Energy Facility, as no consideration has been given to mitigate the identified very high magnitude visual impact that the proposed Solar Energy Facility will have on the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT and the businesses operated thereon.

Kindly acknowledge receipt hereof.

Yours faithfully



JULIAN SPANG  
GENERAL MANAGER



# MILLYS RESTAURANT AND CHALETS (PTY) LTD

Registration No. 2023/514076/07  
VAT Registration No. 4250309350

PO Box 14010,  
West Acres,  
Nelspruit, 1211

Telephone: [REDACTED]

Farm De Kroon, N4 Highway, Machadodorp, 1770

15 August 2023

Mr. Cornelius Holtzhausen

Savannah Environmental

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

Dear Sir,

**COMMENTS: APPLICATION FOR THE AMENDMENT OF THE ENVIRONMENTAL  
AUTHORISATION (“EA”) FOR THE PROPOSED CONSTRUCTION OF THE 14MW  
MACHADODORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363  
IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to your e-mail of 3 July 2023 confirming our registration as an interested and affected party and herewith submit our comments on the matter.

Millys Restaurant and Chalets (Pty) Ltd is the owner of the Millys Restaurant, Millys Chalets and Millys Café businesses, situated on the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT, which forms part of the Millys Complex.

Applications for Amendment of Environmental Authorisation (14/12/16/3/3/1/738)

The applications fail to recognise and do not take account of:

- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Machado Rainbow Trout (Pty) Ltd to Pine Glow Investments (Pty) Ltd on 9 December 2015, where the 2016, 2018 and 2022 Applications for Amendment of the Environmental Authorisation improperly, or possibly fraudulently, reflect Machado Rainbow Trout (Pty) Ltd as the land owner, whereas Pine Glow Investments (Pty) Ltd was the registered land owner.
- The sale of Portion 22 of the Farm De Kroon 363 JT (3.9475 ha) to SANRAL for inclusion in the N4 road reserve, which portion was created by subdivision of the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT (Sub Divisional Diagram SG 537/2019).
- The subdivision of the Remaining Extent of Portion 8 of The Farm De Kroon 363 JT, which created Portion 20 of the Farm De Kroon 363 JT (7.0054 ha).

- The change of ownership of Portion 20 of the Farm De Kroon 363 JT to Leroma Properties (Pty) Ltd on 26 April 2021.
- The establishment of Milly's South Township on Portion 20 of the Farm De Kroon 363 JT and the resultant amendment of land use rights.
- The change of ownership of the Remaining Extent of Portion 8 of the Farm 363 JT from Pine Glow Investments (Pty) Ltd to Milly's Properties (Pty) Ltd on 24 April 2023.

### Visual Impact

- The Visual Impact Index Map in the July 2023 Visual Assessment conducted by LOGIS reflects that the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT is situated in a zone which will experience a potentially very high magnitude visual impact as a result of the development of the proposed Solar Energy Facility.
- The author of the 2023 report claims that the affected environment as described in the 2012 Visual Impact Assessment remains largely unchanged, even though the 2012 report disregarded the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT for assessment of visual impact as a result of the development of the proposed Solar Energy Facility.
- The author of the 2023 report claims that the "land use zonation" of the larger study area remains agricultural, which is not true as the zoning of the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT is Mixed Use.
- The author of the report claims that despite the fact that some of the additional receptor sites (which includes the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT) may experience visual impacts of very high magnitude, these impacts may only be of moderate significance, due to none of the recipient sites (e.g. adjacent land owners) raising any objection to the proposed development.
- The author however fails to disclose that the only reason why Milly's Restaurant and Chalets (Pty) Ltd is not on record as an objector with regards to the proposed Solar Energy Facility, is that it was not aware of the proposed development nor was it consulted at any time prior to the June 2023 Notice of Part 1 EA Amendment and Public Participation Process.
- The businesses owned by Milly's Restaurant and Chalets (Pty) Ltd rely heavily on the fact that the Milly's Complex is a tourist attraction. The very high visual impact of the proposed

Solar Energy Facility will negatively impact the tourist attraction value of the Millys Complex and therewith the business operations conducted thereon.

- We therefore object to the proposed Solar Energy Facility, as no consideration has been given to mitigate the identified very high magnitude visual impact that the proposed Solar Energy Facility will have on the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT and the businesses operated thereon.

Kindly acknowledge receipt hereof.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Julian Spano', written over a large, stylized, circular scribble.

JULIAN SPANO

GENERAL MANAGER

08 August 2023

Mr. Justin Spano  
QSR Machado (Pty) Ltd

Good Day,

Your correspondence regarding the Public Participation Process for the Part 1 Amendment of the Environmental Authorisation, DFFE ref: 14/12/16/3/3/1/738/AM5 has reference. The information regarding the interests of QSR Machado Operations in terms of the project has been noted and is recorded as part of the amendment process. The information requested, has been sent via WeTransfer, and is available for 7 days at the following link for download.

<https://wetransfer.com/downloads/ac7d7a13cf883cd6f960038236cd6cc720230808082358/a144e24b411d3b5da4ded5063d0e5a1e20230808082433/d9add5>

Details of the servitude granted against the title deed of the affected property have been noted and are acknowledged. The respective servitude agreement will remain in the event that the project is developed. However the footprint area of the solar energy facility, an area less than 20ha, will result in a change of land use from agriculture to industrial use to accommodate the facility. It is possible for both activities to continue on the affected property. It is recommended that a meeting be arranged between yourselves, the Proponent and landowner in order to determine the best way forward in this regard.

Kindly acknowledge receipt hereof and provide us with a response.

Yours Sincerely,

Michael Morreira  
Savannah Environmental (Pty) Ltd  
Environmental Sustainability Consultant



8 August 2023

Mr. Michael Morreira

Savannah Environmental

Email: michael@savannahsa.com

Dear Mr. Morreira,

**RE : PUBLIC PARTICIPATION PROCESS FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (“EA”) FOR THE PROPOSED CONSTRUCTION OF THE 14MW MACHADADORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363 IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to your letter of 24 July 2023 and the corresponding information made available to us via WeTransfer.

In order to place us in a position to properly reply to your letter and also to submit comments with regards to the Application for the Amendment of the Environmental Authorisation dated 16 May 2023, please provide us with the following information :

1. A copy of the Land Owner’s Consent that was appended to the Application for Amendment of Environmental Authorisation dated 7 April 2016.
2. A copy of the Application for Amendment of Environmental Authorisation dated 4 April 2018 – the document in the corresponding WeTransfer folder, 0540\_001.pdf, is a further copy of the 7 April 2016 application and its supporting documents.
3. A copy of the Land Owner’s Consent that was appended to the Application for Amendment of Environmental Authorisation dated 4 April 2018.
4. A copy of the Land Owner’s Consent that was appended to the Application for Amendment of Environmental Authorisation dated 19 May 2022.
5. A copy of the Notice to the Competent Authority of the 9 December 2015 change of land ownership.
6. A copy of the Notice to the Competent Authority of the 24 April 2023 change of land ownership.
7. Confirmation of whether Savannah Consulting is in agreement with the 2012 Visual Impact Assessment which excludes the entire Millys Complex (being the Remaining Extent of

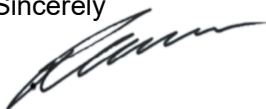
Portion 11 of the Farm De Kroon 363 JT, Portion 14 of the Farm De Kroon 363 JT and the Remaining Extent of Portion 13 of the Farm De Kroon 363 JT) from the digital viewshed and consequently disregards same for assessment of the visual impact of the proposed Solar Energy Facility.

8. Confirmation of whether Savannah Consulting is in agreement with the 2023 Visual Assessment conducted by LOGIS which excludes Erf 3 Millys South Township, which is situated immediately adjacent to the proposed Solar Energy Facility, from any assessment of visual impact, even though the property is situated in a zone which according to the report's Visual Impact Index Map will experience a potentially high magnitude visual impact.
9. Confirmation that Savannah Consulting remains of the opinion that a valid extension of time of the Environmental Authorisation is possible having regard for the subdivision of the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT, that created Erf 3 Milly's South Township, with its zoning and the further impacts to be considered.
10. A complete list of the "*current land owner(s)*" referred to in section 5.3 of the Motivation Report – this information was not found in the WeTransfer folder that was shared with us.
11. How you propose repositioning the proposed Solar Energy Facility having regard for the irrigation servitude which is subject to the positioning requirements for an irrigation facility (distances to water "Resources" etc) prescribed by the National Water Act, 36 of 1998?
12. Confirmation whether, once the proposed Solar Energy Facility has been repositioned to accommodate the irrigation area, such proposed re-positioned Solar Energy Facility is permitted to form part of the application for the extension of validity of the current Environmental Authorisation or whether an entirely new application for Environmental Authorisation would be required?
13. Confirmation that you are of the opinion that earlier extensions of duration of the Environmental Authorisation, which were granted without the consent of the registered land owner while Machado Rainbow Trout was not the land owner, are valid and were validly applied for and granted?

All our rights vis-à-vis the proponents of the solar facility and Savannah Environmental as their appointed Environmental Assessment Practitioners are strictly reserved.

Kindly provide us with the above requested information by no later than 16h00 on Thursday 10 August 2023, so that we may be afforded a fair opportunity to provide our comments on this matter by 15 August 2023.

Sincerely



Raymond Nell

General Manager : Property and Brand Development





17 July 2023

Mr. Cornelius Holtzhausen

Savannah Environmental

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

Dear Sir,

**PUBLIC PARTICIPATION PROCESS FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (“EA”) FOR THE PROPOSED CONSTRUCTION OF THE 14MW MACHADADORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363 IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

**URGENT**

We refer to the application for the amendment of the environmental authorisation (“EA”) for “*the proposed construction of the 14MW Machadodorp PV 1 solar energy facility on Portion 8 of the Farm de Kroon 363 in the Emakhaseni local municipality in Mpumalanga*” (DFFE Ref.: 14/12/16/3/3/1/738/AM5).

We confirm that Leroma Properties (Pty) Ltd is directly affected by this application as the owner of Erf 3 Milly’s South Township (formerly Portion 20 of the Farm de Kroon 363 JT) which abuts the property on which the solar energy facility is proposed, as are, *inter alia*, Pine Glow Investments (Pty) Ltd - the franchisor of the Caltex Starstop Millyls and the former owner of the Remaining Extent of Portion 8 of the Farm de Kroon 363 JT and Leroma Investments (Pty) Ltd – the current owner of the Remaining Extent of Portion 11, Remaining Extent of Portion 13 and Portion 14 of the said farm, and the various entities that operate the businesses on the aforesaid properties.

We urgently require the following documentation and/or information to enable us to sensibly engage with this application:

1. The title deed showing that ownership and the extent of the Remaining Extent of Portion 8 of the Farm de Kroon 363 JT, Emakhaseni, Mpumalanga has remained as it was cadastrally registered when the original EA was issued in May 2013 without change or interruption.
2. A full copy of the original EA dated 21 May 2013 (14/12/16/3/3/1/738).
3. A full copy of the Environmental Basic Assessment Report 2013 and supporting documents.

4. A full copy of the application for amendment that led to the issuing of the amended environmental authorisation dated 16 May 2016 (14/12/16/3/3/1/738/AM2) including supporting documents.
5. Full copies of all correspondence exchanged between the applicant or on behalf of the applicant and the department regarding this application.
6. A full copy of the amended environmental authorisation dated 16 May 2016.
7. A full copy of the application for amendment that led to the issuing of the amended environmental authorisation dated 14 May 2018 (14/12/16/3/3/1/738/AM3) including supporting documents.
8. Full copies of all correspondence exchanged between the applicant or on behalf of the applicant and the department regarding this application.
9. A full copy of the amended environmental authorisation dated 14 May 2018.
10. A full copy of the application for amendment that led to the issuing of the amended environmental authorisation issued on 08 June 2022 dated 14 May 2018 (14/12/16/3/3/1/738/AM3) including supporting documents.
11. Full copies of all correspondence exchanged between the applicant or on behalf of the applicant and the department regarding this application.
12. A full copy of the amended environmental authorisation dated 8 June 2022.
13. A full copy of the current application for amendment including supporting documents.
14. Full copies of all correspondence exchanged between the applicant or on behalf of the applicant and the department regarding the current application.
15. A complete list of the “*current land owner(s)*” referred to in section 5.3 of the Motivation Report.

If the above stated request appears excessive, we assure you that it is not when the following, of which you appear not to be aware, is borne in mind:

1. Pine Glow Investments (Pty) Ltd purchased the Remaining Extent of Portion 8 of the Farm de Kroon 363 JT from Machado Rainbow Trout CC in March 2015 with registration of transfer taking place on 9 December 2015.
2. The Remaining Extent of Portion 8 of the Farm de Kroon 363 JT was subdivided to create certain Portions including Portion 20.
3. Portion 20 of the Farm de Kroon 363 JT was sold and transferred to Leroma Properties (Pty) Ltd on 26 April 2021. A township was established on Portion 20 and the property is now known as Erf 3 of Milly's South Township.
4. The Remaining Extent of Portion 8 of the Farm de Kroon 363 was then transferred to Milly's Properties (Pty) Ltd subject to Notarial Deed of Servitude K/170/2023/S for the irrigation of agricultural land on which the solar facility was/is proposed. A copy of the Notarial Deed is attached for ease of reference.



5. The amendments granted in 2016, 2018 and 2022 were granted without the knowledge or consent of the landowner at the time, Pine Glow Investments (Pty) Ltd.

Had the proponents of the activity simply spoken to neighbours and the Grantees of the servitude registered against the Title Deed, they would know we are not opposed to the establishment of a solar facility on the Remaining Extent of Portion 8 in principle but will not accede to non-compliance with the environmental legislation nor any disregard for our duly registered rights. As it stands, the likely area to be used for irrigation coincides with the envisaged area of the to be established solar farm.

We are mightily perturbed that Savannah Environmental appears not to have verified even the most basic information, such as the correct description of the property on which the activity is proposed or the servitudinal obligations that property bears, in producing a Motivation for a proposed activity.

Unless we receive written confirmation that the application for amendment has been withdrawn and proof that the department has been informed accordingly before then, we expect the documents and information requested above by no later than close of business on Tuesday 25 July 2023.

All our rights vis-à-vis the proponents of the solar facility and Savannah Environmental as their appointed Environmental Assessment Practitioners are strictly reserved.

Kindly acknowledge receipt hereof and provide us with your most urgent response.

Sincerely



Raymond Nell

General Manager : Property and Brand Development



# Starstop Machado Operations (Pty) Ltd

Registration No.2020/265024/07  
VAT No. 4250291459

PO Box 14010, West Acres, Nelspruit, 1211  
Telephone: (013) 880 0939  
N4 Highway, Farm De Kroon, Machadodorp,  
1170.

29 June 2023

Mr. Cornelius Holtzhausen

Savannah Environmental

Email: publicprocess@savannahsa.com

Dear Sir,

**PUBLIC PARTICIPATION PROCESS FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (“EA”) FOR THE PROPOSED CONSTRUCTION OF THE 14MW MACHADADORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363 IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to the “July 2023” notice regarding the abovementioned public participation process received by us on 28 June 2023 and request you to register us as an interested and affected party (“I&AP”).

Starstop Machado Operations (Pty) Ltd is the Freshstop and Steers Franchisee at Starstop Millys, situated on Portion 14 of the Farm De Kroon 363 JT, which forms part of the Millys Complex.

Consequently, Starstop Machado Operations (Pty) Ltd stands to be directly affected by the proposed amendment.

Kindly also provide us with the following documents and/or information by return:

1. A complete copy of the EA dated 21 May 2013.
2. A complete copy of the final environmental report submitted in support of the application pursuant to which the said EA was issued.
3. A complete copy of the application to amend the EA.
4. Complete copies of all and/or any reports or documents that accompany the said application to amend, if any.
5. A detailed written explanation of how the proposed activity will impact on servitudes registered over the Remaining Extent of Portion 8 of the Farm De Kroon after the granting of the EA in 2013.
6. A detailed written explanation of how the proposed activity and the EA previously granted will be impacted by the reduced extent of the Remaining Extent Portion 8 of the Farm De Kroon 363 JT, having regard for the subdivisions that created Portion 20 of the Farm De Kroon 363 JT and Portion 22 of the Farm De Kroon 363 JT?
7. A complete list of I&APs notified of the application to amend the EA.

In view thereof that the notice as issued provides no time limits, you are also requested to inform us of the following by return:

1. The date on which the application to amend was submitted to the competent authority.
2. The date on which the notice of the public participation process was issued to I&APs.
3. The cut-off date for registration as I&APs.
4. The cut-off date for submission of comments and/or objections.

As you would know, I&APs have a Constitutional right enabled by the Promotion of Administrative Justice Act, 103 of 2000, to be fully informed of administrative actions that will affect them, and to make submissions before any decision is taken. We will not be in a position to consider our position until we are provided with the documents and information listed above and all our rights are strictly reserved.

Kindly acknowledge receipt hereof.

We await your prompt response.

Yours faithfully



Kobus Klopper  
Director

# STARSTOP MACHADO FUEL (PTY) LTD

P.O. Box 14107  
West Acres  
Nelspruit  
1211

E-mail: [starstopmachadofuel@gmail.com](mailto:starstopmachadofuel@gmail.com)  
C: 082 878 0288  
T: 013 880 0939

29 June 2023

Mr. Cornelius Holtzhausen  
Savannah Environmental  
Fax: 086684 0547  
Email: [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)

Dear Sir,

**PUBLIC PARTICIPATION PROCESS FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (“EA”) FOR THE PROPOSED CONSTRUCTION OF THE 14MW MACHADADORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363 IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to the “July 2023” notice regarding the abovementioned public participation process received by us on 28 June 2023 and request you to register us as an interested and affected party (“I&AP”).

Starstop Machado Fuel (Pty) Ltd is the Caltex Filling Station Franchisee at Starstop Millys, situated on Portion 14 of the Farm De Kroon 363 JT, which forms part of the Millys Complex.

Consequently, Starstop Machado Fuel (Pty) Ltd stands to be directly affected by the proposed amendment.

Kindly also provide us with the following documents and/or information by return:

1. A complete copy of the EA dated 21 May 2013.
2. A complete copy of the final environmental report submitted in support of the application pursuant to which the said EA was issued.
3. A complete copy of the application to amend the EA.
4. Complete copies of all and/or any reports or documents that accompany the said application to amend, if any.
5. A detailed written explanation of how the proposed activity will impact on servitudes registered over the Remaining Extent of Portion 8 of the Farm De Kroon after the granting of the EA in 2013.
6. A detailed written explanation of how the proposed activity and the EA previously granted will be impacted by the reduced extent of the Remaining Extent Portion 8 of the Farm De Kroon 363 JT, having regard for the subdivisions that created Portion 20 of the Farm De Kroon 363 JT and Portion 22 of the Farm De Kroon 363 JT?

**Directors: Kobus Klopper**  
**Registration number: 2020/265670/07**

# STARSTOP MACHADO FUEL (PTY) LTD

P.O. Box 14107  
West Acres  
Nelspruit  
1211

E-mail: [starstopmachadofuel@gmail.com](mailto:starstopmachadofuel@gmail.com)  
C: 082 878 0288  
T: 013 880 0939

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7. A complete list of I&APs notified of the application to amend the EA.

In view thereof that the notice as issued provides no time limits, you are also requested to inform us of the following by return:

1. The date on which the application to amend was submitted to the competent authority.
2. The date on which the notice of the public participation process was issued to I&APs.
3. The cut-off date for registration as I&APs.
4. The cut-off date for submission of comments and/or objections.

As you would know, I&APs have a Constitutional right enabled by the Promotion of Administrative Justice Act, 103 of 2000, to be fully informed of administrative actions that will affect them, and to make submissions before any decision is taken. We will not be able to consider our position until we are provided with the documents and information listed above and all our rights are strictly reserved.

Kindly acknowledge receipt hereof.

We await your prompt response.

Yours faithfully



Pine Glow Investments (Pty) Ltd / trading as  
**Caltex Mpumalanga North Marketer**

5 Van Rensburg Street, Proforum Building, 1st Floor, Nelspruit, 1201  
PO Box 1401 [REDACTED], Nelspruit, 1201  
Share Call [REDACTED] Telephone [REDACTED] Fax +[REDACTED]



**CALTEX**

MPUMALANGA NORTH MARKETER

29 June 2023

Mr. Cornelius Holtzhausen

Savannah Environmental

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

Dear Sir,

**PUBLIC PARTICIPATION PROCESS FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (“EA”) FOR THE PROPOSED CONSTRUCTION OF THE 14MW MACHADADORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363 IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to the “July 2023” notice regarding the abovementioned public participation process received by us on 28 June 2023 and request you to register us as an interested and affected party (“I&AP”). Pine Glow Investments (Pty) Ltd trading as Caltex Mpumalanga North Marketer is the Franchisor of the Caltex Starstop Millys, situated on Portion 14 of the Farm De Kroon 363 JT, which forms part of the Millys Complex.

Consequently, Pine Glow Investments (Pty) Ltd stands to be directly affected by the proposed amendment.

Kindly also provide us with the following documents and/or information by return:

1. A complete copy of the EA dated 21 May 2013.
2. A complete copy of the final environmental report submitted in support of the application pursuant to which the said EA was issued.
3. A complete copy of the application to amend the EA.
4. Complete copies of all and/or any reports or documents that accompany the said application to amend, if any.
5. A detailed written explanation of how the proposed activity will impact on servitudes registered over the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT after the granting of the EA in 2013.
6. A detailed written explanation of how the proposed activity and the EA previously granted will be impacted by the reduced extent of the Remaining Extent Portion 8 of the Farm De Kroon 363

Directors N Omar, TH le Roux (Managing Director), AM le Roux, MI Omar  
Registration No. 2010/007287/07 VAT Registration No. 4250258730

**IT'S HOW YOU GET THERE**  **CALTEX**



JT, having regard for the subdivisions that created Portion 20 of the Farm De Kroon 363 JT and Portion 22 of the Farm De Kroon 363 JT?

7. A complete list of I&APs notified of the application to amend the EA.

In view thereof that the notice as issued provides no time limits, you are also requested to inform us of the following by return:

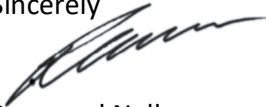
1. The date on which the application to amend was submitted to the competent authority.
2. The date on which the notice of the public participation process was issued to I&APs.
3. The cut-off date for registration as I&APs.
4. The cut-off date for submission of comments and/or objections.

As you would know, I&APs have a Constitutional right enabled by the Promotion of Administrative Justice Act, 103 of 2000, to be fully informed of administrative actions that will affect them, and to make submissions before any decision is taken. We will not be in a position to consider our position until we are provided with the documents and information listed above and all our rights are strictly reserved.

Kindly acknowledge receipt hereof.

We await your prompt response.

Sincerely



Raymond Nell  
General Manager : Property and Brand Development



# LEROMA INVESTMENTS (Pty) Ltd

5 Van Rensburg Street, Newburgh, 1099

P.O. Box 14010, West Acres, 1211

29 June 2023

Mr. Cornelius Holtzhausen

Savannah Environmental

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

Dear Sir,

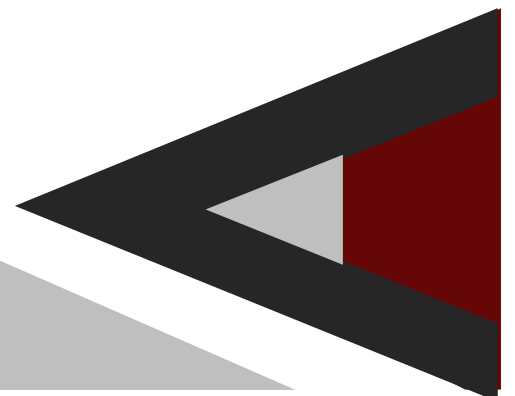
**PUBLIC PARTICIPATION PROCESS FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORITY ("EA") FOR THE PROPOSED CONSTRUCTION OF THE 14MW MACHADADORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363 IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to the "July 2023" notice regarding the abovementioned public participation process received by us on 28 June 2023 and request you to register us as an interested and affected party ("I&AP").

Leroma Investments (Pty) Ltd is the owner of the properties on which the Millys Complex is situated, being the Remaining Extent of Portion 11, Portion 14 and the Remaining Extent of Portion 13 of the Farm De Kroon 363 JT.

Leroma Investments (Pty) Ltd is also a Grantee in respect of Notarial Deed of Servitude K170/2023S, which is registered against the title deed (T3252/2023) of the Remaining Extent of Portion 8 of the Farm de Kroon 363 JT.

Consequently, Leroma Investments (Pty) Ltd stands to be directly affected by the proposed amendment.



Kindly also provide us with the following documents and/or information by return:

1. A complete copy of the EA dated 21 May 2013.
2. A complete copy of the final environmental report submitted in support of the application pursuant to which the said EA was issued.
3. A complete copy of the application to amend the EA.
4. Complete copies of all and/or any reports or documents that accompany the said application to amend, if any.
5. A detailed written explanation of how the proposed activity will impact on servitudes registered over the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT after the granting of the EA in 2013.
6. A detailed written explanation of how the proposed activity and the EA previously granted will be impacted by the reduced extent of the Remaining Extent Portion 8 of the Farm De Kroon 363 JT, having regard for the subdivisions that created Portion 20 of the Farm De Kroon 363 JT and Portion 22 of the Farm De Kroon 363 JT?
7. A complete list of I&APs notified of the application to amend the EA.

In view thereof that the notice as issued provides no time limits, you are also requested to inform us of the following by return:

1. The date on which the application to amend was submitted to the competent authority.
2. The date on which the notice of the public participation process was issued to I&APs.
3. The cut-off date for registration as I&APs.
4. The cut-off date for submission of comments and/or objections.

As you would know, I&APs have a Constitutional right enabled by the Promotion of Administrative Justice Act, 103 of 2000, to be fully informed of administrative actions that will affect them, and to make submissions before any decision is taken. We will not be in a position to consider our position until we are provided with the documents and information listed above and all our rights are strictly reserved.

Kindly acknowledge receipt hereof.

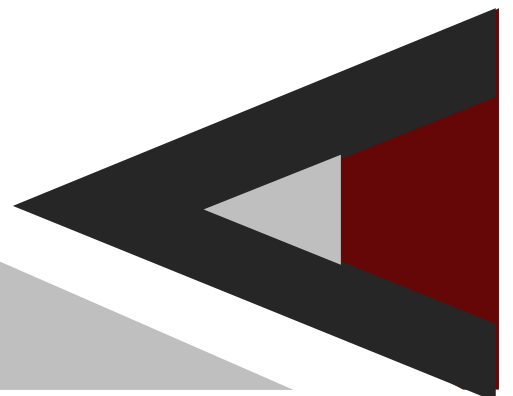
We await your prompt response.

Sincerely



Raymond Nell

General Manager : Property and Brand Development



29 June 2023

Mr. Cornelius Holtzhausen

Savannah Environmental

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

Dear Sir,

**PUBLIC PARTICIPATION PROCESS FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (“EA”) FOR THE PROPOSED CONSTRUCTION OF THE 14MW MACHADADORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363 IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to the “July 2023” notice regarding the abovementioned public participation process received by us on 28 June 2023 and request you to register us as an interested and affected party (“I&AP”).

Leroma Properties (Pty) Ltd is the owner of Erf 3 Millys South Township, which is adjacent to the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT.

Leroma Properties (Pty) Ltd is also a Grantee in respect of Notarial Deed of Servitude K170/2023S, which is registered against the title deed (T3252/2023) of the Remaining Extent of Portion 8 of the Farm de Kroon 363 JT.

Leroma Properties (Pty) Ltd is also a party to Notarial Deed of Servitude K186/2021S, amended by Notarial Deed of Servitude K168/2023/S, which are both registered against the title deed (T3252/2023) of the Remaining Extent of Portion 8 of the Farm de Kroon 363 JT.

Consequently, Leroma Properties (Pty) Ltd stands to be directly affected by the proposed amendment.

Kindly also provide us with the following documents and/or information by return:

1. A complete copy of the EA dated 21 May 2013.
2. A complete copy of the final environmental report submitted in support of the application pursuant to which the said EA was issued.
3. A complete copy of the application to amend the EA.
4. Complete copies of all and/or any reports or documents that accompany the said application to amend, if any.

5. A detailed written explanation of how the proposed activity will impact on servitudes registered over the Remaining Extent of Portion 8 of the Farm De Kroon 363 JT after the granting of the EA in 2013.
6. A detailed written explanation of how the proposed activity and the EA previously granted will be impacted by the reduced extent of the Remaining Extent Portion 8 of the Farm De Kroon 363 JT, having regard for the subdivisions that created Portion 20 of the Farm De Kroon 363 JT and Portion 22 of the Farm De Kroon 363 JT?
7. A complete list of I&APs notified of the application to amend the EA.

In view thereof that the notice as issued provides no time limits, you are also requested to inform us of the following by return:

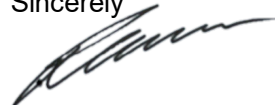
1. The date on which the application to amend was submitted to the competent authority.
2. The date on which the notice of the public participation process was issued to I&APs.
3. The cut-off date for registration as I&APs.
4. The cut-off date for submission of comments and/or objections.

As you would know, I&APs have a Constitutional right enabled by the Promotion of Administrative Justice Act, 103 of 2000, to be fully informed of administrative actions that will affect them, and to make submissions before any decision is taken. We will not be in a position to consider our position until we are provided with the documents and information listed above and all our rights are strictly reserved.

Kindly acknowledge receipt hereof.

We await your prompt response.

Sincerely



Raymond Nell

General Manager : Property and Brand Development



# QSR Machado (Pty) Ltd

Registration No.2020/735329/07  
VAT No: 4670300583

PO Box 14010, West Acres,  
Nelspruit, 1211  
Telephone: (013) 752 5848  
Fax: (013) 752 6362  
5 van Rensburg street, Nelspruit,  
1200

29 June 2023

Mr. Cornelius Holtzhausen  
Savannah Rental  
Fax: [REDACTED]  
Email: publicprocess@savannahsa.com

Dear Sir,

**PUBLIC PARTICIPATION PROCESS FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (“EA”) FOR THE PROPOSED CONSTRUCTION OF THE 14MW MACHADADORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363 IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to the “July 2023” notice regarding the abovementioned public participation process received by us on 28 June 2023 and request you to register us as an interested and affected party (“I&AP”).

QSR Machado Operations (Pty) Ltd is the Mugg & Bean Franchisee at Starstop Millys, situated on Portion 14 of the Farm De Kroon 363 JT, which forms part of the Millys Complex.

Consequently, QSR Machado Operations (Pty) Ltd stands to be directly affected by the proposed amendment.

Kindly also provide us with the following documents and/or information by return:

1. A complete copy of the EA dated 21 May 2013.
2. A complete copy of the final environmental report submitted in support of the application pursuant to which the said EA was issued.
3. A complete copy of the application to amend the EA.
4. Complete copies of all and/or any reports or documents that accompany the said application to amend, if any.
5. A detailed written explanation of how the proposed activity will impact on servitudes registered over the Remaining Extent of Portion 8 of the Farm De Kroon after the granting of the EA in 2013.

6. A detailed written explanation of how the proposed activity and the EA previously granted will be impacted by the reduced extent of the Remaining Extent Portion 8 of the Farm De Kroon 363 JT, having regard for the subdivisions that created Portion 20 of the Farm De Kroon 363 JT and Portion 22 of the Farm De Kroon 363 JT?
7. A complete list of I&APs notified of the application to amend the EA.

In view thereof that the notice as issued provides no time limits, you are also requested to inform us of the following by return:

1. The date on which the application to amend was submitted to the competent authority.
2. The date on which the notice of the public participation process was issued to I&APs.
3. The cut-off date for registration as I&APs.
4. The cut-off date for submission of comments and/or objections.

As you would know, I&APs have a Constitutional right enabled by the Promotion of Administrative Justice Act, 103 of 2000, to be fully informed of administrative actions that will affect them, and to make submissions before any decision is taken. We will not be in a position to consider our position until we are provided with the documents and information listed above and all our rights are strictly reserved.

Kindly acknowledge receipt hereof.

We await your prompt response.

Yours faithfully



Johann Spano

[Redacted] SA





## MILLYS TROUT (PTY) LTD

Registration No: 2023/514047/07  
VAT Registration No: 4120309358

PO Box 14010,  
West Acres,  
Nelsp [REDACTED]  
Telephone: [REDACTED]  
Farm De Kroon, N4 Highway, Machadodorp, 1770

29 June 2023

Mr. Cornelius Holtzhausen  
Savannah Environmental  
Fax: [REDACTED]  
Email: publicprocess@savannahsa.com

Dear Sir,

**PUBLIC PARTICIPATION PROCESS FOR THE AMENDMENT OF THE ENVIRONMENTAL  
AUTHORISATION (“EA”) FOR THE PROPOSED CONSTRUCTION OF THE 14MW  
MACHADADORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363  
IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to the “July 2023” notice regarding the abovementioned public participation process received by us on 28 June 2023 and request you to register us as an interested and affected party (“I&AP”).

Millys Trout (Pty) Ltd is the owner of the Trout Factory and Bakery businesses, situated on the Remaining Extent of Portion 13 of the Farm De Kroon 363 JT, which forms part of the Millys Complex.

Consequently, Millys Trout (Pty) Ltd stands to be directly affected by the proposed amendment.

Kindly also provide us with the following documents and/or information by return:

1. A complete copy of the EA dated 21 May 2013.
2. A complete copy of the final environmental report submitted in support of the application pursuant to which the said EA was issued.
3. A complete copy of the application to amend the EA.
4. Complete copies of all and/or any reports or documents that accompany the said application to amend, if any.
- 5.
6. A detailed written explanation of how the proposed activity will impact on servitudes registered over the Remaining Extent of Portion 8 of the Farm De Kroon after the granting of the EA in 2013.

7. A detailed written explanation of how the proposed activity and the EA previously granted will be impacted by the reduced extent of the Remaining Extent Portion 8 of the Farm De Kroon 363 JT, having regard for the subdivisions that created Portion 20 of the Farm De Kroon 363 JT and Portion 22 of the Farm De Kroon 363 JT?
8. A complete list of I&APs notified of the application to amend the EA.

In view thereof that the notice as issued provides no time limits, you are also requested to inform us of the following by return:



1. The date on which the application to amend was submitted to the competent authority.
2. The date on which the notice of the public participation process was issued to I&APs.
3. The cut-off date for registration as I&APs.
4. The cut-off date for submission of comments and/or objections.

As you would know, I&APs have a Constitutional right enabled by the Promotion of Administrative Justice Act, 103 of 2000, to be fully informed of administrative actions that will affect them, and to make submissions before any decision is taken. We will not be in a position to consider our position until we are provided with the documents and information listed above and all our rights are strictly reserved.

Kindly acknowledge receipt hereof.

We await your prompt response.

Yours faithfully

  
JULIAN SPAWO  
OPERATIONAL MANAGER  




## MILLYS FARMSTALL (PTY) LTD

Registration No: 2023/004306/07  
VAT Registration No: 4280309354

PO Box 14010,  
West Acres,  
Nelspruit 1211  
Telephone: [REDACTED]  
Farm De Kroon, N4 Highway, Machadodorp, 1770

29 June 2023

Mr. Cornelius Holtzhausen  
Savannah Environmental  
Fax: 086684 0547  
Email: publicprocess@savannahsa.com

Dear Sir,

**PUBLIC PARTICIPATION PROCESS FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION ("EA") FOR THE PROPOSED CONSTRUCTION OF THE 14MW MACHADODORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363 IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to the "July 2023" notice regarding the abovementioned public participation process received by us on 28 June 2023 and request you to register us as an interested and affected party ("I&AP").

Millys Farmstall (Pty) Ltd is the owner of the Millys Farmstall business, situated on the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT, which forms part of the Millys Complex.

Consequently, Millys Farmstall (Pty) Ltd stands to be directly affected by the proposed amendment.

Kindly also provide us with the following documents and/or information by return:

1. A complete copy of the EA dated 21 May 2013.
2. A complete copy of the final environmental report submitted in support of the application pursuant to which the said EA was issued.
3. A complete copy of the application to amend the EA.
4. Complete copies of all and/or any reports or documents that accompany the said application to amend, if any.
- 5.
6. A detailed written explanation of how the proposed activity will impact on servitudes registered over the Remaining Extent of Portion 8 of the Farm De Kroon after the granting of the EA in 2013.

7. A detailed written explanation of how the proposed activity and the EA previously granted will be impacted by the reduced extent of the Remaining Extent Portion 8 of the Farm De Kroon 363 JT, having regard for the subdivisions that created Portion 20 of the Farm De Kroon 363 JT and Portion 22 of the Farm De Kroon 363 JT?
8. A complete list of I&APs notified of the application to amend the EA.

In view thereof that the notice as issued provides no time limits, you are also requested to inform us of the following by return:

1. The date on which the application to amend was submitted to the competent authority.
2. The date on which the notice of the public participation process was issued to I&APs.
3. The cut-off date for registration as I&APs.
4. The cut-off date for submission of comments and/or objections.

As you would know, I&APs have a Constitutional right enabled by the Promotion of Administrative Justice Act, 103 of 2000, to be fully informed of administrative actions that will affect them, and to make submissions before any decision is taken. We will not be in a position to consider our position until we are provided with the documents and information listed above and all our rights are strictly reserved.

Kindly acknowledge receipt hereof.

We await your prompt response.

Yours faithfully



JULIAN SPANO

[REDACTED] MAGER



# MILLYS RESTAURANT AND CHALETS (PTY) LTD

Registration No. 2023/514076/07  
VAT Registration No. 4250309350

PO Box 14010,  
West Acres,  
Nelspruit  
Telephone: [REDACTED]  
Farm De Kroon, N4 Highway, Machadodorp, 1770

29 June 2023

Mr. Cornelius Holtzhausen  
Savannah [REDACTED] Rental  
Fax: [REDACTED]  
Email: publicprocess@savannahsa.com

Dear Sir,

**PUBLIC PARTICIPATION PROCESS FOR THE AMENDMENT OF THE ENVIRONMENTAL  
AUTHORISATION ("EA") FOR THE PROPOSED CONSTRUCTION OF THE 14MW  
MACHADORP PV1 SOLAR ENERGY FACILITY ON PORTION 8 OF THE FARM DE KROON 363  
IN THE EMAKHAZENI LOCAL MUNICIPALITY IN MPUMALANGA PROVINCE.**

We refer to the "July 2023" notice regarding the abovementioned public participation process received by us on 28 June 2023 and request you to register us as an interested and affected party ("I&AP").

Millys Restaurant and Chalets (Pty) Ltd is the owner of the Millys Restaurant, Millys Chalets and Millys Café businesses, situated on the Remaining Extent of Portion 11 of the Farm De Kroon 363 JT, which forms part of the Millys Complex.

Consequently, Millys Restaurant and Chalets (Pty) Ltd stands to be directly affected by the proposed amendment.

Kindly also provide us with the following documents and/or information by return:

1. A complete copy of the EA dated 21 May 2013.
2. A complete copy of the final environmental report submitted in support of the application pursuant to which the said EA was issued.
3. A complete copy of the application to amend the EA.
4. Complete copies of all and/or any reports or documents that accompany the said application to amend, if any.
5. A detailed written explanation of how the proposed activity will impact on servitudes registered over the Remaining Extent of Portion 8 of the Farm De Kroon after the granting of the EA in 2013.

6. A detailed written explanation of how the proposed activity and the EA previously granted will be impacted by the reduced extent of the Remaining Extent Portion 8 of the Farm De Kroon 363 JT, having regard for the subdivisions that created Portion 20 of the Farm De Kroon 363 JT and Portion 22 of the Farm De Kroon 363 JT?
7. A complete list of I&APs notified of the application to amend the EA.

In view thereof that the notice as issued provides no time limits, you are also requested to inform us of the following by return:

1. The date on which the application to amend was submitted to the competent authority.
2. The date on which the notice of the public participation process was issued to I&APs.
3. The cut-off date for registration as I&APs.
4. The cut-off date for submission of comments and/or objections.

As you would know, I&APs have a Constitutional right enabled by the Promotion of Administrative Justice Act, 103 of 2000, to be fully informed of administrative actions that will affect them, and to make submissions before any decision is taken. We will not be in a position to consider our position until we are provided with the documents and information listed above and all our rights are strictly reserved.

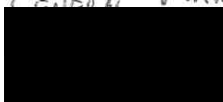
Kindly acknowledge receipt hereof.

We await your prompt response.

Yours faithfully



JULIAN SPAU  
GENERAL MANAGER



COMMENTS FROM: INTERESTED & AFFECTED  
PARTIES



Savannah Environmental (Pty) Ltd  
Cnr Woodlands Drive & Western Service Road  
Woodmead  
2191

26 July 2023

**By: Email**

**TO: Cornelius Holtzhausen**

**RE: Machadodorp PV1 Solar Energy Facility**

**MTN REF: MTNSF/013/07/23**

With reference to your Solar farm application known as Machadodorp PV1 Solar Energy Facility, on Portion 8 of the farm De Kroon 363 of the Emakazheni Local Municipality in Mpumalanga Province.

MTN has conducted an analysis of the impact of your project on its network.

MTN wishes to inform your that your project has been approved.

---

**Lester Molea**

Site Acquisition Manager

**MOBILE TELEPHONE NETWORKS PROPRIETARY LIMITED (Registration number:1993/ 001436/07)**

216 14th Avenue, Fairland, 2195

Private Bag 11, Sandton, Johannesburg, South Africa

Tel: 011 782 6000 Fax: 011 782 6001 Website [www.mtn.com](http://www.mtn.com)

Directors: MJ Harper (Chairman), CS Molapisi (Chief Executive Officer), D Molefe (Chief Financial Officer), MJ Bosman, SA Fokie, N Khan, T Leoka, TBL Molefe, FJ Moolman, RT Mupita, PD Norman, R Ramashia, J Schulte-Bockum, and SA Zinn

Company Secretary: MMF Rantofi

VAT No. 4630140434