

COMMENTS RECEIVED AFTER NOTIFICATION OF  
BASIC ASSESSMENT PROCESS

Non Received

DEPARTMENT OF AGRICULTURE, FORESTRY AND  
FISHERIES



# agriculture, forestry & fisheries

Department:  
Agriculture, Forestry and Fisheries  
REPUBLIC OF SOUTH AFRICA

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

Enquiries: J Mans  
E-mail: [JacolineMa@daff.gov.za](mailto:JacolineMa@daff.gov.za)  
Date: 15 April 2019  
Ref: 40.8.14.2/NC/149

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

Attention: Nicolene Venter <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>

## RE: COMMENTS ON NOTIFICATION OF BASIC ASSESSMENT: NAMAS WIND ENERGY FARM GRID CONNECTION PROJECT

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

- 1.1 Section 12(1): "The Minister may declare-
  - (a) a particular tree,
  - (b) a particular group of trees,
  - (c) a particular woodland; or
  - (d) trees belonging to a particular species, to be a protected tree, group of trees, woodland or species.
  
- 1.2 Section 15(1): "No person may-
  - (a) Cut, disturb, damage or destroy any protected tree; or
  - (b) Possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, or any forest product derived from a protected tree, except-
    - (i) under a license granted by the Minister; or
    - (ii) in terms of an exemption from the provision of this subsection published by the Minister in the Gazette on the advice of the Council."
  
- 1.3 "Any person who contravenes the prohibition on-
  - (i) The cutting, disturbance, damage or destruction of temporarily protected trees or groups of trees referred to in section 14(2) or protected trees referred to in section 15(1)(a); or

- (ii) The possession, collection, removal, transport, export, purchase or sale of temporarily protected trees or groups of trees referred to in section 14(2) or protected trees referred to in section 15(1)(b), or any forest product derived from a temporarily protected tree, group of trees or protected tree, is guilty of a first category offence.

1.4 Section 58 (1): "Any person who is guilty of a first category offence referred to in sections 62 and 63 may be sentenced to a fine or imprisonment for a period of up to three years, or to both a fine and such imprisonment."

1.5 The list of protected tree species under section 12(1) (d) of the National Forests Act, 1998 (Act No. 84 of 1998) is published annually; the most recent publication was in GN536 of 7 September 2018.

## 2. COMMENTS ON NOTICE OF BASIC ASSESSMENT PROCESS

2.1 Protected trees such as *Vachellia erioloba* and *Euclea pseudebenus* are often found in the Lower Gariep Alluvial Vegetation type, which is listed as threatened. If the new 132kV Rooivlei-Gromis double circuit power line must cross Orange River and the associated riparian vegetation, pylons should be placed to avoid protected trees.

2.2 The developer should note that the whole servitude width of 31m x 32km cannot be cleared of protected trees. If protected trees must be removed, clearance will be restricted to the trees directly under the power line and up to 4m away on either side of the outer lines.

2.3 Trees with bird nests may not be disturbed without a valid Fauna Permit from Nature Conservation, under the Northern Cape Nature Conservation Act, Act 9 of 2009 (NCNCA).

2.4 Getting a Forest Act License can take up to 30 days. License application forms are available on the Departmental website or at any Forestry Office. The Department may ask supporting documentation when assessing a license application. For construction activities of this nature, the following supporting documents are normally requested:

- Completed License Application Form
- Accurate estimation of the number of trees to be felled per species
- Georeferenced map showing the final approved alignment of the power line
- Copy of the I.D. of the applicant (developer's representative)
- Copy of the Environmental Authorisation
- Flora Permit Reference Number
- Copy of Fauna Permit (if applicable)

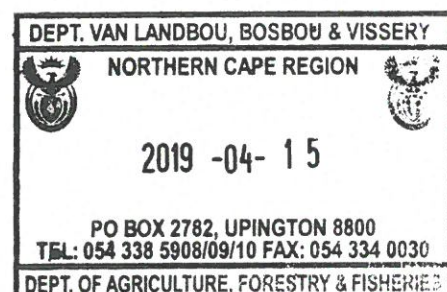
Thank you for notifying the Department of the proposed project.

Kind Regards,



Jacoline Mans (Chief Forester: NFA Regulation)

DATE: 15/04/2019



SOUTH AFRICAN HERITAGE RESOURCES AGENCY

Our Ref:



an agency of the  
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
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Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: nhiggitt@sahra.org.za  
CaseID: 13835

Date: Thursday June 27, 2019  
Page No: 1

## Final Comment

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

Attention: Genesis Namas Wind (Pty) Ltd

c/o Unit B10, Century Plaza, Heron Crescent, Century City, Cape Town

**Project Name: Grid connection infrastructure for the Namas Wind Farm, Northern Cape Applicant: Genesis Namas Wind (Pty) Ltd Proposed Activity: The development of a double-circuit 132kV power line and collector substation to connect the Namas Wind Farm substation to the Eskom grid. The power line and collector substation will be assessed within a 300m grid connection corridor. Location: The 300m power line corridor is located within the Nama Khoi Local Municipality and the Namakwa District Municipality in the Northern Cape. The corridor falls within Focus Area 8 of the Renewable Energy Development Zones (REDZ), which is known as the Springbok REDZ. The power line corridor traverses eleven affected properties: Portion 3 of the Farm Zonnekwa 328, Portion 2 of the Farm Zonnekwa 328, Portion 1 of the Farm Zonnekwa 326, Remaining extent of the Farm Zonnekwa 326, Remaining extent of the Farm Honde Vlei 325, Remaining extent of the Farm Kannabieduin 324, Remaining extent of the Farm Sand Kop 322, Remaining extent of the Farm Mannels Vley 321, Remaining extent of the Farm Dikgat 195, Portion 15 of the Farm Dikgat 195 and the Remaining Extent of Farm Roivlei 327.**

Savannah Environmental (Pty) Ltd has been appointed by Genesis Namas Wind (Pty) Ltd to conduct an Environmental Authorisation (EA) Application process for the proposed grid connection infrastructure for the Namas Wind Energy facility, near Kleinsee, Northern Cape Province.

A Basic Assessment Report (BAR) has been completed in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include the construction of a double-circuit 132kv powerline. A corridor 300 m wide and 32 km long has been assessed. Additional infrastructure will include a new collector substation/switching station and access tracks

ASHA Consulting was appointed to provide heritage input into the EA Application process as per section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Orton, J. 2019. Heritage Impact Assessment: Proposed Grid Connection Infrastructure for the Namas Wind*

Our Ref:



an agency of the  
Department of Arts and Culture

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Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
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## *Farm, Namakwaland Magisterial, Northern Cape.*

A total of 49 heritage resources were identified as part of the survey. These include surface occurrences of background lithic scatters of various time periods and well defined sites that include flaked quartz outcrops, sites with artefacts such as ostrich eggshell fragments, Stone Age artefacts including formal tools, grinding stones, metal fragments, historical glass bottles, historical ceramics fragments, pottery sherds, an ostrich eggshell flask cache and a small family graveyard. Of the 48 sites, five were deemed to be of a low-medium significance and three were rated as sites of medium significance. A total of 20 sites were provided with recommended mitigation measures. It must be noted that the identified burial ground is located outside of the 300 m corridor and will not be impacted.

It is noted that the report states that sparsely distributed fossil material from the middle and late quaternary fauna may be present in the aeolian deposits, most specifically the Dorbank dune plumes in the south-eastern section of the corridor.

Recommendations provided in the report include the following:

- An archaeologist should be appointed to conduct a final pre-construction survey of the approved layout (i.e. the route of the double-circuit 132kv powerline and the location of the collector substation within the 300 m corridor) at least six months prior to commencement of construction;
- A chance finds procedure must be implemented for the rescuing of any fossils discovered during construction;
- All work is to be carried out within the authorised construction footprint (i.e. 300 m corridor). Any new areas, outside of the 300 m corridor, that may need to be disturbed must be surveyed for archaeological sites prior to disturbance;
- Any disturbed areas not required during operation must be rehabilitated after construction; and
- If any archaeological material or human burials are uncovered during the course of the development, then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

It is noted that the development footprint is located in an area of low palaeontological sensitivity as per the SAHRIS PalaeoSensitivity Map.

## **Final Comment**





an agency of the  
Department of Arts and Culture

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The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – Specific conditions for the development include:
  - i) – The recommendations of the heritage specialists and the recommendations contained within the EMPr with regards to heritage resources are supported;
  - ii) – A report detailing the results of the walk-down of the final layout of the route must be submitted to SAHRA for comment prior to the construction phase;
  - iii) – A Fossil Finds Procedure must be developed for the construction phase of the development as per the recommendations of the SAHRIS PalaeoSensitivity map;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
  - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
- As the BAR has been finalised prior to SAHRA providing this comment, this comment must be forwarded directly to the competent authority for consideration during the decision-making process. Proof of the delivery and receipt thereof of this comment must be supplied to SAHRA via the SAHRIS application;

Our Ref:



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Department of Arts and Culture

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Enquiries: Natasha Higgitt  
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CaseID: 13835

Date: Thursday June 27, 2019  
Page No: 4

- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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Phillip Hine  
Acting Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/523775>  
(, Ref: )

**Terms & Conditions:**

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.

DEPARTMENT OF ENVIRONMENTAL AFFAIRS



## environmental affairs

Department:  
Environmental Affairs  
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 · PRETORIA · 0001 · Environment House · 473 Steve Biko Road, Arcadia, · PRETORIA

**DEA Reference:** 14/12/16/3/3/1/2032

**Enquiries:** Herman Alberts

**Telephone:** (012) 399 9371 **E-mail:** HALberts@henvironment.gov.za

Ms Karen Jodas  
Savannah Environmental (Pty) Ltd  
PO Box 148  
**SUNNINGHILL**  
2157

Telephone Number: (011) 656 3237  
Email Address: karen@savannahsa.com

### **PER E-MAIL / MAIL**

Dear Ms Jodas

### **COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED CONSTRUCTION OF ELECTRICAL GRID INFRASTRUCTURE TO SUPPORT THE NAMAS WIND ENERGY FACILITY (WEF), NORTHERN CAPE PROVINCE**

The Draft Basic Assessment Report (BAR) dated May 2019 and received by the Department on 29 May 2019, refer.

*On 08 December 2014 the Minister of Water and Environmental Affairs promulgated regulations in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), viz, the NEMA Environmental Impact Assessment (EIA) Regulations 2014 (GN R982, R983, R984 and R985 of 04 December 2014). The NEMA EIA Regulations, 2014 and listing notices, were subsequently amended on 07 April 2017 (refer to GN R324, R325, R326, R327 of 07 April 2017) and is being referred to as NEMA EIA Regulations, 2014, as amended. The same referencing would apply to the listing notices containing the listed activities that would require Environmental Authorisation.*

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

#### **(a) Listed Activities**

- i. Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description.
- ii. If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.environment.gov.za/documents/forms>.

#### **(b) Alternatives**

- i. Please provide a description of any identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity as per Appendix 1 (2) (e)

and 3 (1) (h) (i) of GN R.982 of 2014, as amended. Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.

**(c) Project details**

- i. The final BAR must provide the technical details for the proposed powerline in a table format as well as their description and/or dimensions, as per below.

Component	Description / dimensions
Length of powerline	
Area of servitude	
Clearance height of powerline	
Area occupied by inverter / transformer stations / substations	
Capacity of powerline	
Area occupied by both permanent and construction laydown areas	

- ii. The final BAR must provide the four corner coordinate points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.

**(d) Specialist Declaration of Interest**

- i. Specialist Declaration of Interest forms must be attached to the final BAR. You are therefore requested to submit original signed Specialist Declaration of Interest forms for each specialist study conducted. The forms are available on Department's website (please use the Department's template).

**(e) Undertaking of an Oath**

- i. The Department has noted that the submitted application form has an undertaking under oath or affirmation by the EAP. However, the aforementioned oath was not included in the draft BAR, but rather an appendix of the application form attached to the BAR. Please note that the final BAR must also have an undertaking under oath/ affirmation by the EAP.
- ii. Based on the above, you are therefore required to include an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 1(3)(r) of the NEMA EIA Regulations, 2014, as amended, which states that the BAR must include:
- "an undertaking under oath or affirmation by the EAP in relation to:*
- (i) the correctness of the information provided in the reports;*
  - (ii) the inclusion of comments and inputs from stakeholders and I&APs;*
  - (iii) the inclusion of inputs and recommendations from the specialist reports where relevant; and*
  - (iv) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties".*

**(f) Details and Expertise of the EAP**

- i. You are required to include the details and expertise of the EAP in the BAR, including a curriculum vitae, in order to comply with the requirements of Appendix 1(3)(1)(a) of the NEMA EIA Regulations, 2014, as amended.

**(g) Public Participation Process**

- i. The following information must be submitted with the final BAR:
- A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended;
  - Copies of all comments received during the draft BAR comment period; and

- A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the draft BAR. Please note that comments received from this Department must also form part of the comment and response report.
- ii. Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR.
- iii. Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.

#### **(h) Environmental Management Programme**

- i. It is drawn to your attention that in terms of Government Gazette No. 435 of 22 March 2019, applications for environmental authorisation for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programme, contemplated in Regulations 19(4) and Appendix 4(2) of EIA Regulations 2014, as amended must be used. As such, the following generic EMPr as contemplated in Regulation 19(4) and appendix 4(2) must be submitted as part of the final report.
  - Generic EMPr for development and expansion for overhead electricity transmission and distribution infrastructure; and
  - Generic EMPr for development and expansion of substation infrastructure for transmission and distribution of electricity.
- ii. In addition to the above, if any specific environmental sensitivities/attributes are present on the site which require more specific impact management outcomes and impact management actions, not included in the pre-approved generic EMPr template, to manage impacts, those impact management outcomes and actions must be included in section C of the generic EMPr.

#### **General**

Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.

You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *"Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority - (a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority."*

Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended, which states: *"the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process"*

contemplated in subregulation (1)(a) and that the revised reports or, EMP or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days”.

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely



**Mr Sabelo Malaza**

**Chief Director: Integrated Environmental Authorisations**

**Department of Environmental Affairs**

**Signed by: Mr Coenrad Agenbach**

**Designation: Deputy Director: Priority Infrastructure Projects**

**Date: 01-07-2019**

cc:	Davin Chown	Genesis Namas Wind (Pty) Ltd	Email: davin@genesis-eco.com
	Brian Fischer	NC Department of Environment and Nature Conservation	Email: BFisher@ncpg.gov.za
	Samantha Titus	Nama Khoi Local Municipality	Email: municipality.manager@namakhoi.gov.za

DEPARTMENT OF ROADS AND PUBLIC WORKS





**Reference Number: L.2.1.2.9 – MR00745, DR02964/PL/0719**

**Enquires: V. Ngcobo, C. Ndubula**

**Date : 01 July 2019**

**Savannah Environmental**

**P.O. Box 148**

**Sunninghill**

**2157**

**Attention: N. Venter**

**RE: GRID CONNECTION INFRASTRUCTURE FOR THE NAMAS WIND FARM  
NEAR KLEINSEE, NORTHERN CAPE PROVINCE**

Refer to your application letter received by email on the 24 May 2019.

The Provincial Roads that will be affected by your proposal are:

- MR745, a class 3 Rural Road with a minimum road reserve width of 30m, and;
- DR2964, a class 4 Rural Road with a minimum road reserve width of 25m.

The Department of Roads and Public Works (DRPW) hereby grants the applicant approval to execute the proposed works.


**The following standard conditions must be complied with at all times in case of any work undertaken within the statutory road reserve or within a distance of 95 meters from the centerline of any building restriction road (advertising on Roads and Ribbon Development Act, no.21 of 1940) and within the statutory road reserve or within 5 meters from the statutory boundary of any public road (Roads Ordinance, 19 of 1976).**

1. The applicant must submit a detailed layout design for approval prior to any works. The design must include but not limited to; the offset distance with respect to the centerline of the road(s), height clearance, etc..
2. The applicant must inform the District Roads Engineer at least 14 days before the works and immediately on completion of the works thereof quoting the Reference number and date of the letter of approval.
3. The applicant must investigate all the existing services (sewer lines, pipelines, underground cables and overhead cables) passing through or alongside that specific area.
4. The work must be carried out to the satisfaction of the District Roads Engineer and in close collaboration with the Traffic Section (as per SARTSM (South African Road Traffic Safety Manual) concerned.
5. Poles or towers carrying power lines in excess of 22kV must be erected outside the statutory road width and not closer than 50 meters to the centerline of the road(s) concerned.
6. In cases where an overhead power line crosses a public road:
  - a) The poles and/or towers must comply with the distances and road clearance as per ESKOM standards and;
  - b) Provision must be made for a vertical clearance as prescribed by the standards set out in the latest ESKOM distribution guide, but in any case not less than 7.5 meters measured from the highest point of the road to the lowest point in the cable crossing the road reserve.
7. All excavations within the statutory road width must be reinstated to the satisfaction of the District Roads Engineer concerned.
8. If any fence along the road boundaries is removed by the applicant or is damaged through his activities, it must be restored to the original standard.
9. By accepting this approval, the applicant undertakes;
  - a) To maintain at his own cost at all times all proposed works (including all components) and to take all necessary precautions to ensure the safety of road users and that he will fully compensate the controlling authority/road authority for any expenditure incurred by such controlling authority/road authority in connection with repairs to the road damaged as a result of the

installation or maintenance of or repairs to, or any shortcoming or defect, caused in any way whatsoever, in the relevant of powerline which you've installed in terms to this approval or any section of any such service.

- b) To remove or shift or relocate or alter at his own cost and without compensation, any installed service, etc, laid at a distance of more than five (5) meters outside the statutory road width of a public road but within a distance of 95 meters from the centerline of a building restriction road, if such removal or shifting or relocation of alteration is deemed necessary but the controlling authority/road authority as a result of the widening, construction or maintenance of such road; provided that such widening, construction or maintenance shall not involve a deviation of the road;
  - c) To indemnify the controlling authority/road authority against all claims or whatever nature, including legal costs, by any person, including the applicant, originating from or as a result of the installation of the service etc., or as a result of the failure of the applicant to maintain or safeguard properly the said proposed works, etc.;
10. No work may be undertaken within the statutory width of a building restriction road/public road before sunrise or after sunset, except in a case of emergency, when it must be carried out in collaboration with the Traffic Section (as per SARTSM) concerned. This is to ensure the safety of road users. Adequate warning signs must be erected.
11. This approval does not exempt the applicant from complying with any other law that may be applicable to the proposed work and related activities
12. The work may only be carried out provided the foregoing conditions, where applicable, are accepted in full and provided all the prescriptions, requirements and obligations which the controlling authority/road authority might impose in connection with the work under or along the road(s), are accepted and complied with.
13. After construction, the applicant must submit one set of AS BUILT drawings electronically to the DRPW.

SIGNED at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_.

A handwritten signature in black ink, appearing to be 'R. M. A. G.', written over a horizontal line.

For and on behalf of  
**THE DEPARTMENT OF ROADS AND PUBLIC WORKS NORTHERN CAPE**

DEPARTMENT OF WATER AND SANITATION



## water & sanitation

Department:  
Water and Sanitation  
**REPUBLIC OF SOUTH AFRICA**

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Private Bag X6101, Kimberley, 8300  
28 Central Road, Beaconsfield Kimberley  
Tel: (053) 836 7600, Fax: 086 547 2792

Enquiries: V. Ramugondo

Email: ramugondov@dws.gov.za  
Reference:

### **Genesis Namas Wind (PTY) LTD**

P.O. Box 148  
Sunninghill  
2157

### **By Email/Registered Mail**

Dear Ms. Nicolene Venter  
Email: publicprocess@savannahsa.com

### **RE: DRAFT BASIC ASSESSMENT REPORT FOR THE CONSTRUCTION AND OPERATION OF A GRID CONNECTION SOLUTION FOR THE AUTHORISED NAMAS WIND FARM ON VARIOUS PORTIONS FARM NEAR KLEINSEE, NORTHERN CAPE**

Reference is hereby made to your Basic Assessment Report for the construction and operation of a grid connection solution for the proposed Namas Wind Farm. The proposed activity will take place within the Lower Orange Water Management Area. The reports compiled by Savannah Environmental (Pty) Ltd on behalf of Genesis Namas Wind (PTY) LTD were presented to the Department of Water and Sanitation dated 03 July 2019.

#### **1. COMMENTS**

As mentioned in the report, the Department takes note that the proposed activity at the above mentioned location will include development of collector substation (known as the Rooivlei substation) and a double-circuit 132kV power line (known as Rooivlei-Gromis 132kV powerline and associated infrastructure on a site located in Kleinsee within Nama Khoi Local Municipality. The Department has evaluated the said Draft Basic Assessment Report and has no objection to the approval of the Basic Assessment Report. However, the following should be addressed and presented to Department by the applicant before approval of the Basic Assessment Report:

- a) Please note that the Department rates all perennial and non-perennial rivers together with all dry river beds and natural drainage and associated riparian areas extremely sensitive to development. An option of developing (construction of genesis Namas Wind Farm) furthest away from the all water course would be the preferred option;



**RE: DRAFT BASIC ASSESSMENT REPORT FOR THE CONSTRUCTION AND OPERATION OF A GRID CONNECTION SOLUTION FOR THE AUTHORISED NAMAS WIND FARM ON VARIOUS PORTIONS FARM NEAR KLEINSEE, NORTHERN CAPE**

- b) No development or construction should be done or may occur within 100 metres; 1:100 year flood line of a river/drainage lines (whichever is furthest) and 500 m of a pan/wetland without authorisation from this Department. The water courses should be delineated in order to provide an appropriate buffer to maintain such water courses;
- c) Vehicles and other machinery must be serviced well above the 1:100 year flood line or within a horizontal distance of 100 meters from any watercourse or 500 m of a wetland/pan. Oils and other potential pollutants must be disposed at an appropriate licensed site, with the necessary agreement from the owner of such a site;
- d) Storm water must be diverted from the construction works and roads must be managed in such a manner as to disperse runoff and to prevent the concentration of storm water. Storm water control works must be constructed, operated and maintained in a sustainable manner throughout the project;
- e) Increased runoff due to vegetation clearance and/or soil compaction must be managed, and storm water leaving the construction site must in no way be contaminated by any substance, whether such substance is a solid, liquid, vapour or gas or a combination thereof which is produced, used, stored, dumped or spilled on the premises;
- f) A detailed layout plan needs to be submitted to the Department showing all the facilities in the proposed development including distance from the any watercourses. Details of the final design must also be included as soon as a decision has been made, as the details of this factor may influence the environmental impact both during the construction and operational phases of the project;
- g) Material with pollution generating potential must be limited in construction activities. Any hazardous substances must be handled according to the relevant legislation relating to transport, storage and use of the substance.
- h) Any spillage of any hazardous materials including diesel that may occur during construction and operation must be reported immediately to our Department;
- i) The final Basic Assessment Report must clearly show all water courses as defined in the National Water Act, 1998 (Act 36 of 1998) as well as the delineated 1:100 year flood lines or 100 meters of a river/drainage line (whichever is furthest) and 500 metres.
- j) Clear color topographical map showing the property, facilities in the property, land use, water courses and location of water abstraction point.
- k) The disposal of general waste and that of hazardous waste must be carried out in an environmentally safe way as to prevent and/or minimise the potential for pollution of water resources and collection of which should be done by an accredited waste collector. All applicable Sections of the National Environmental Management: Waste Act 59 of 2008 should be strictly adhered to;

**RE: DRAFT BASIC ASSESSMENT REPORT FOR THE CONSTRUCTION AND OPERATION OF A GRID CONNECTION SOLUTION FOR THE AUTHORISED NAMAS WIND FARM ON VARIOUS PORTIONS FARM NEAR KLEINSEE, NORTHERN CAPE**

- l) Your client is therefore advised to apply and obtain the water use authorisation prior to commencement of the proposed activities. The applicant should send the intent to apply for a water use authorisation to the Department;
- m) Should the project continue; pre-consultation meeting must be arranged and a site visit and must be conducted by DWS officials with the applicant, and then followed by a Water Use Licence Application (proof of consultation and submission of an application). This must be submitted to DWS in terms of the National Water Act, 1998 (Act 36 of 1998) before any activities take place;
- n) All applicable Sections of the National Environmental Management: Waste Act 59 of 2008 should be strictly adhered to;
- o) Section 19 & 20 of the National Water Act, 1998 (Act No.36 of 1998) should be adhered to;

This reply does not grant any exemption from the requirements of any applicable Act, Ordinance, Regulation or By-law.

This office reserves the right to revise initial comments and request additional information that may arise from correspondence and/or upon inspection.

Please note that any use of water without authorization is illegal as it is in contravention of the National Water Act and is punishable by law.

You may contact the Department should you have any enquiries.

Yours sincerely



**ACTING DIRECTOR: INSTITUTIONAL ESTABLISHMENT**

**DATE:** 11/07/2019



DE BEERS GROUP OF COMPANIES  
Namaqualand Mines

## Savannah Public Process

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**From:** Meyer, Anton <Anton.Meyer@debeersgroup.com>  
**Sent:** Monday, July 1, 2019 8:55 AM  
**To:** Savannah Public Process; Nicolene Venter  
**Subject:** RE: Grid Connection Infrastructure for the Zonnequa Wind Farm

Hi Nicolene

De Beers has no objection to the development. Just one correction and one feedback question for both Namas and Zonnekwa grid connection BAR's:

- Mining operations at Namaqualand Mines were suspended in 2010, not 2008 as mentioned in the BAR's.
- What system is in place to ensure that disturbances caused by the proposed wind farm grid connections are properly marked to avoid confusion with possible existing disturbances caused by diamond mining/prospecting operations?

Regards,

**Anton Meyer**  
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**De Beers Group of Companies**  
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