

APPENDIX C7(7): COMMENTS RECIEVED

Comments on Basic Assessment Report
Review period 04 March 2021 – 06 May 2021
(C&RR: Point 1)

Key Stakeholders and Interested & Affected Parties

Post-review period comments
(C&RR: Point 2)



RICHARD SUMMERS INC.
A T T O R N E Y S

Savannah Environmental
PO Box 148
Sunninghill, Gauteng
2157

Our ref.: CSP20-003
Your ref.:

Attention: Ms. Nicolene Venter
Per email: nicolene@savannahsa.com

Attention: Ms. Jo-Anne Thomas
Per email: joanne@savannahsa.com

7 June 2021

Dear Ms. Venter and Ms. Thomas

**RE: PROPOSED WIND GARDEN AND FRONTEER WIND ENERGY FACILITIES, EASTERN CAPE PROVINCE
[DFFE REF. NO.: 14/12/16/3/3/1/2314 AND 14/12/16/3/3/1/2315 RESPECTIVELY] – PUBLIC
PARTICIPATION PROCESS**

1. We refer to the abovementioned projects and confirm that we act on behalf of several registered interested and affected parties (I&APs), including Kwandwe Private Game Reserve ('Kwandwe').
2. Since the submission of preliminary comments on behalf of our registered I&AP clients on 6 May 2021, we have had further opportunity to consult with Kwandwe regarding the potential impact of the abovementioned projects on the environment.
3. This letter stems from the fact that neither the draft Basic Assessment Reports ("BARs") nor any of the specialist studies undertaken deals specifically with the potential impacts on megafauna in a terrestrial context. No reasons are provided in the draft BARs for this omission. Specifically, the potential impact of the wind energy facilities on two species in particular – Elephants (*Loxodonta africana*) and Black Rhino (*Diceros bicornis*) is of particular concern to Kwandwe and must be assessed as a valid project-related impact. The assessment should include but not be



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limited to the effect of vibrations, blasting and acoustic impacts associated with the construction and operational phases of the projects on megafauna.

4. Given the strategic significance of Kwandwe as a core Protected Area in the surrounding ecological landscape, coupled with the pivotal role Kwandwe plays in Elephant and Black Rhino conservation, it is crucial that these concerns be acknowledged and addressed during the assessment process. The failure to address the impacts on terrestrial megafauna in the draft BARs and specialist studies is a serious gap in the assessment process.
5. While this submission does not form part of any formal commenting period, the concern is being raised and formally tabled. The issue needs to be addressed due to gravity of the omission in the assessment process to date. In the circumstances, we hereby request that the aforementioned concerns are addressed in respect of the abovementioned projects in the course and scope of the revised BARs and specialist reports that are currently underway.
6. We look forward to receiving your favourable response.

Yours faithfully,

RICHARD SUMMERS INC.

Per: R W Summers

Commencement of BA Process
(C&RR: Point 3)

ORGANS OF STATE

Eskom SOC Ltd

Savannah Public Process

From: John Geeringh
Sent: Monday, January 25, 2021 7:53 AM
To: Savannah Public Process
Subject: RE: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of commencement of Basic Assessment and Public Participation Processes
Attachments: Eskom requirements for work in or near Eskom servitudes.doc; Renewable Energy Generation Plant Setbacks to Eskom Infrastructure Rev2 - signed.pdf

Please find attached Eskom general requirements for works at or near Eskom infrastructure and servitudes. Please also find attached the Eskom setbacks guideline the applicant needs to consider during planning of the layouts and positioning of infrastructure.

Kind regards

John Geeringh (Pr Sci Nat)(EAPASA)
Senior Consultant Environmental Management
Land and Rights
Eskom Transmission Division
Megawatt Park, D1Y42, Maxwell Drive, Sunninghill, Sandton.

From: Public Process <publicprocess@savannahsa.com>
Sent: Friday, 22 January 2021 15:39
To: John Geeringh
Cc: nicolene@savannahsa.com; ronald@savannahsa.com; Nicolene Venter <nicolene@savannahsa.com>
Subject: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of commencement of Basic Assessment and Public Participation Processes

DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES BETWEEN SOMERSET EAST AND MAKHANDA, EASTERN CAPE PROVINCE

Dear John,

A cluster of renewable energy facilities is proposed to be developed on various project sites located between Somerset East and Makhandla within the Cookhouse Renewable Energy Development Zone (REDZ), as well as the Eastern Strategic Transmission Corridor. The cluster consists of nine (9) projects which includes six (6) wind farms, two (2) solar energy facilities and one (1) Main Transmission Substation (MTS). A suitable project site for each development has been identified by the project development companies and the entire extent of the projects is located within the Sarah Baartman District Municipality. The western section is located within the Blue Crane Route Local Municipality and the eastern section within the Makana Local Municipality.

Please find attached the Background Information Document which provides additional information

regarding the application for the six (6) wind energy facilities, the two (2) solar energy facilities and the 400MW Main Transmission Substation.

The .KMZs for the development sites and grid connection are not yet available and as soon as these become available, we will forward it to you.

Please accept my apologies for omitting you from the projects' databases at this early stage of the project.

Please do not hesitate to contact us should you require additional information and/or clarification regarding the projects. Our team welcomes your participation and look forward to your involvement throughout this process.

Kind regards,



t: 011 656 3237
f: 086 684 0547

Nicolene Venter
Public Process

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[SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015](#)

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TO WHOM IT MAY CONCERN

Eskom requirements for work in or near Eskom servitudes.

1. Eskom's rights and services must be acknowledged and respected at all times.
2. Eskom shall at all times retain unobstructed access to and egress from its servitudes.
3. Eskom's consent does not relieve the developer from obtaining the necessary statutory, land owner or municipal approvals.
4. Any cost incurred by Eskom as a result of non-compliance to any relevant environmental legislation will be charged to the developer.
5. If Eskom has to incur any expenditure in order to comply with statutory clearances or other regulations as a result of the developer's activities or because of the presence of his equipment or installation within the servitude restriction area, the developer shall pay such costs to Eskom on demand.
6. The use of explosives of any type within 500 metres of Eskom's services shall only occur with Eskom's previous written permission. If such permission is granted the developer must give at least fourteen working days prior notice of the commencement of blasting. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued in terms of the blasting process. It is advisable to make application separately in this regard.
7. Changes in ground level may not infringe statutory ground to conductor clearances or statutory visibility clearances. After any changes in ground level, the surface shall be rehabilitated and stabilised so as to prevent erosion. The measures taken shall be to Eskom's satisfaction.
8. Eskom shall not be liable for the death of or injury to any person or for the loss of or damage to any property whether as a result of the encroachment or of the use of the servitude area by the developer, his/her agent, contractors, employees, successors in title, and assignees. The developer indemnifies Eskom against loss, claims or damages including claims pertaining to consequential damages by third parties and whether as a result of damage to or interruption of or interference with Eskom's services or apparatus or otherwise. Eskom will not be held responsible for damage to the developer's equipment.
9. No mechanical equipment, including mechanical excavators or high lifting machinery, shall be used in the vicinity of Eskom's apparatus and/or services, without prior written permission having been granted by Eskom. If such permission is granted the developer must give at least seven working days' notice prior to the commencement of work. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued by the relevant Eskom Manager

Note: Where an electrical outage is required, at least fourteen work days are required to arrange it.

10. Eskom's rights and duties in the servitude shall be accepted as having prior right at all times and shall not be obstructed or interfered with.
11. Under no circumstances shall rubble, earth or other material be dumped within the servitude restriction area. The developer shall maintain the area concerned to Eskom's satisfaction. The developer shall be liable to Eskom for the cost of any remedial action which has to be carried out by Eskom.
12. The clearances between Eskom's live electrical equipment and the proposed construction work shall be observed as stipulated by *Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993)*.
13. Equipment shall be regarded electrically live and therefore dangerous at all times.
14. In spite of the restrictions stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993), as an additional safety precaution, Eskom will not approve the erection of houses, or structures occupied or frequented by human beings, under the power lines or within the servitude restriction area.
15. Eskom may stipulate any additional requirements to highlight any possible exposure to Customers or Public to coming into contact or be exposed to any dangers of Eskom plant.
16. It is required of the developer to familiarise himself with all safety hazards related to Electrical plant.
17. Any third party servitudes encroaching on Eskom servitudes shall be registered against Eskom's title deed at the developer's own cost. If such a servitude is brought into being, its existence should be endorsed on the Eskom servitude deed concerned, while the third party's servitude deed must also include the rights of the affected Eskom servitude.

John Geeringh (Pr Sci Nat)(EAPASA)
Senior Consultant Environmental Management
Eskom Transmission Division: Land & Rights
Megawatt Park, D1Y42, Maxwell Drive, Sunninghill, Sandton.
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E-mail: john.geeringh@eskom.co.za

	<p style="text-align: center;">SCOT</p>	<p style="text-align: center;">Technology</p>
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Title: **Renewable Energy Generation Plant Setbacks to Eskom Infrastructure** Unique Identifier: **240-65559775**

Alternative Reference Number: **N/A**

Area of Applicability: **Power Line Engineering**



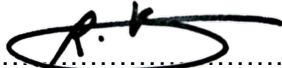
Documentation Type: **Guideline**

Revision: **2**

Total Pages: **9**

Next Review Date: **N/A**

Disclosure Classification: **CONTROLLED DISCLOSURE**

<p>Compiled by</p> <p></p> <p>.....</p> <p>J W Chetty Mechanical Engineer</p> <p>Date: 15 / 09 / 2020</p>	<p>Approved by</p> <p></p> <p>.....</p> <p>B Ntshuntsha Chief Engineer (Lines)</p> <p>Date: 30/10/2020</p>	<p>Authorised by</p> <p></p> <p>.....</p> <p>R A Vajeth Snr Manager (Lines) and SCOT/SC/ Chairperson</p> <p>Date: 30/10/2020</p>
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EXECUTIVE SUMMARY

In recent decades, the use of wind turbines, concentrated solar plants and photovoltaic plants have been on the increase as it serves as an abundant source of energy. This document specifies proposed setbacks for wind turbines and the reasons for these setbacks from infrastructure as well as setbacks for concentrated solar plants and photovoltaic plants. Setbacks for wind turbines employed in other countries were compared and a general setback to be used by Eskom was suggested for use with wind turbines and other renewable energy generation plants.

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1. INTRODUCTION

During the last few decades, a large amount of wind turbines have been installed in wind farms to accommodate for the large demand of energy and depleting fossil fuels. Wind is one of the most abundant sources of renewable energy. Wind turbines harness the energy of this renewable resource for integration in electricity networks. The extraction of wind energy is its primary function and thus the aerodynamics of the wind turbine is important. There are many different types of wind turbines which will all exhibit different wind flow characteristics. The most common wind turbine used commercially is the Horizontal Axis Wind Turbine. Wind flow characteristics of this turbine are important to analyse as it may have an effect on surrounding infrastructure.

Wind turbines also cause large turbulence downwind that may affect existing infrastructure. Debris or parts of the turbine blade, in the case of a failure, may be tossed behind the turbine and may lead to damage of infrastructure in the wake path.

This document outlines the minimum distances that need to be introduced between a wind turbine and Eskom infrastructure to ensure that debris and / or turbulence would not negatively impact on the infrastructure and future expansion of infrastructure (lines and substation) as per the long term planning scenario.

Safety distances of wind turbines from other structures as implemented by other countries were also considered and the reasons for their selection were noted. All renewable energy developments are approved by The Department of Environmental Affairs, Forestry and Fisheries (DEFF) in terms of NEMA. The DEFF is aware of the setbacks guideline, however they cannot use it in terms of decision making since the setbacks document has no legal standing in SA and it would be outside of their mandate who have been advised to follow the guidelines herein.

Concentrated solar plants and photovoltaic plants setbacks away from substations were also to be considered to prevent restricting possible power line access routes to the substation and possible expansion of substations.

2. SUPPORTING CLAUSES

2.1 SCOPE

This document provides guidance on the safe distance that a wind turbine should be located from any Eskom power line or substation. Although it is not based on any legislative requirement, it is deemed important that Eskom's infrastructure and future network expansion planning is not impeded. The document specifies proposed setback distances for transmission lines (220 kV to 765 kV), distribution lines

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(66 kV to 132 kV) and all Eskom substations. Proposed setbacks for concentrated solar plants and photovoltaic plants are also specified away from substations.

2.1.1 Purpose

Setbacks for wind turbines and power lines / substations are required for various reasons. These include possible catastrophic failure of the turbine blade that may release fragments and which may be thrown onto nearby power lines that may result in damage with associated unplanned outages. Turbulence behind the turbine may affect helicopter flight during routine Eskom live line maintenance and inspections that may lead to safety risk of the aircraft / personnel. Concentrated solar plants and photovoltaic plants setback away from substations were required to prevent substations from being boxed in by these renewable generation plants limiting line route access to the substations and possible future substation expansion.

2.1.2 Applicability

This document is applicable to the siting of all new and existing wind turbines, concentrated solar plants and photovoltaic plants near power lines and substations and in line of site between Eskom telecommunication infrastructure, including future Eskom renewable energy development.

2.2 NORMATIVE/INFORMATIVE REFERENCES

2.2.1 Normative

1. <http://www.envir.ee/orb.aw/class=file/action=preview/id=1170403/Hiiumaa+turbulence+impact+EMD.pdf>.
2. <http://www.energy.ca.gov/2005publications/CEC-500-2005-184/CEC-500-2005-184.PDF>
3. <http://www.adamscountywind.com/Revised%20Site/Windmills/Adams%20County%20Ordinance/Adams%20County%20Wind%20Ord.htm>
4. http://www.dsireusa.org/incentives/incentive.cfm?Incentive_Code=PA11R&RE=1&EE=1
5. <http://www.wind-watch.org/documents/european-setbacks-minimum-distance-between-wind-turbines-and-habitations/>
6. <http://www.publications.parliament.uk/pa/ld201011/ldbills/017/11017.1-i.html>
7. http://www.caw.ca/assets/pdf/Turbine_Safety_Report.pdf
8. Rogers J, Slegers N, Costello M. (2011) A method for defining wind turbine setback standards. Wind energy 10.1002/we.468

2.2.2 Informative

None

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2.3 DEFINITIONS

Definition	Description
Setback	The minimum distance between a wind turbine and boundary line/dwelling/road/infrastructure/servitude etc.
Flicker	Effect caused when rotating wind turbine blades periodically cast shadows
Tip Height	The total height of the wind turbine ie. Hub height plus half rotor diameter (see Figure1)

2.3.1 Disclosure Classification

Controlled disclosure: controlled disclosure to external parties (either enforced by law, or discretionary).

2.4 ABBREVIATIONS

Abbreviation	Description
None	

2.5 ROLES AND RESPONSIBILITIES

All parties involved in the positioning wind turbines, concentrated solar plants and photovoltaic plants near power lines/substations should endeavour to follow the setbacks outlined in this guideline.

2.6 PROCESS FOR MONITORING

Agreement by Eskom in writing on any encroachment of the setbacks distance should be requested via the Grid Access Unit. Eskom should ensure that every application for renewable energy (RE) developments are informed about the existence of the setbacks document early in the RE planning process to ensure maximum effect. This includes Eskom RE development.

2.7 RELATED/SUPPORTING DOCUMENTS

None

3. DOCUMENT CONTENT

3.1 INTERNATIONAL SETBACK COMPARISON

Wind Turbine setbacks employed by various countries were considered. It was found that setbacks were determined for various reasons that include noise, flicker, turbine blade failure and wind effects as well as

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future network expansion planning. The distances (setbacks) varied based on these factors and were influenced by the type of infrastructure

Wind turbine setbacks varied for roads, power lines, dwellings, buildings and property and it was noted that the largest setbacks were employed for reasons of noise and flicker related issues [1-7]. Very few countries specified setbacks for power lines.

The literature survey [1-7], yielded information about studies and experiments were conducted to determine the distance that a broken fragment from a wind turbine might be thrown. Even though of low probability of hitting a power line [5.0×10^{-5} ^[8]], the distances recorded were significant [750m ^[8]]

Wind turbines may also cause changes in wind patterns with turbulent effects behind the hub. These factors influence the wind turbine setbacks specified in this document.

Setbacks were thus introduced to prevent any damage to Eskom infrastructure and impedance to operation and future network expansion planning.

Renewable energy plant can also limit access into substations for power lines of all voltages. A setback distance should therefore be employed to prevent substations from being boxed in by these generation plants and preventing future network expansion. These setback distances are specified in this document.

3.2 ESKOM RECOMMENDED SETBACKS

Any renewable energy applicant should engage with Eskom to determine if their plant layout or positioning of turbines, CSP or PV infrastructure would encroach on the proposed setbacks provided for in this guideline and to ensure that their planning and Eskom's future expansion planning is taken into account. Eskom must inform all renewable energy developers, including Eskom RE, of the existence of the setbacks guideline early in the development process. Should there be an encroachment, a formal request should be sent to and accepted by Eskom in writing if any of the below mentioned setback distances are infringed upon:

- Eskom requests a setback distance of 3 times the tip height of the wind turbine from the edge of the closest Eskom servitude (including vacant servitudes) for transmission lines (220kV to 765kV) and Substations.
- Eskom requests a setback distance of 1 times the tip height of the wind turbine from the edge of the closest Eskom servitude (including vacant servitudes) for distribution lines (66 kV to 132 kV) and Substations.

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- A written request should be sent to Eskom via the Grid Access Unit regarding any proposed wind turbine, concentrated solar plants and photovoltaic activity within a 5 km radius of a substation for Eskom to comment on.
- Where concentrated solar plants, photovoltaic structures, battery storage systems (BESS) and other renewable generation plants fall within a 2 km radius of the closest point of a transmission or distribution substation (66kV to 765kV), a written agreement with Eskom is recommended during the planning phase of such plant or structures to ensure Eskom's future planning is not impeded.
- Applicants should not position any wind turbine in the line of site between and two Eskom Radio Telecommunication masts. It should be proven that Eskom radio telecommunication systems (mainly microwave systems) will not be affected in any way by wind turbines due to the criticality of this infrastructure in terms of network operation. Eskom Telecommunications should be engaged on this matter.
- If the position or size of any turbine changes and subsequently infringes on any of the above stated setbacks, a request for relaxation must be sent through to Eskom as per the point mentioned above.

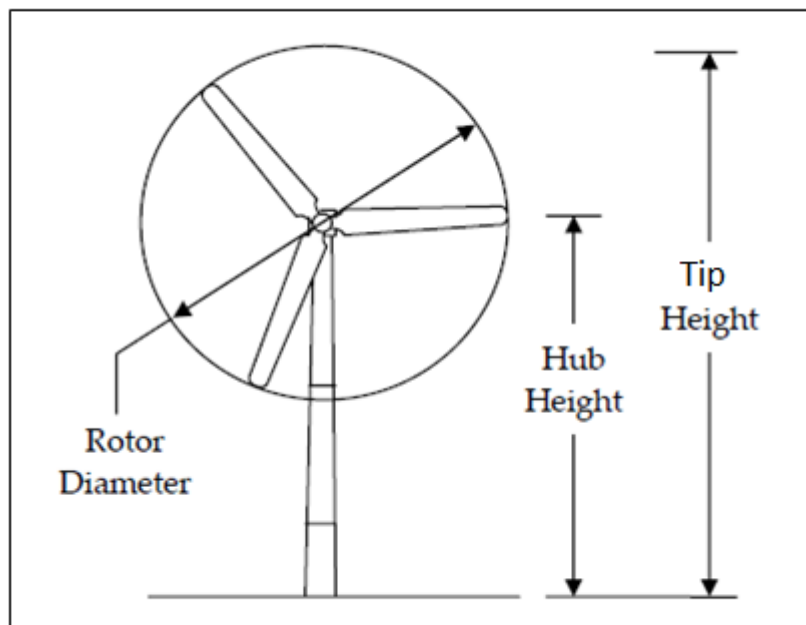


Figure 1: Horizontal Axis Wind Turbine [2]

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4. AUTHORISATION

This document has been seen and accepted by:

Name & Surname	Designation
V Naidoo	Chief Engineer
Dr P Pretorius	Electrical Specialist
J Geeringh	Snr Consultant Environ Mngt
B Haridass	Snr Consultant Engineer
B Ntshunsha	Chief Engineer
R Vajeth	Snr Manager (Lines)
D A Tunncliff	Snr Manager L&R (Acting)
B Branfield	Snr Consultant Engineer

5. REVISIONS

Date	Rev.	Compiler	Remarks
November 2013	0	J W Chetty	First Publication - No renewable energy generation plant setback specification in existence.
October 2018	1	JW Chetty	Modification to sub-section 3.2 to provide more clarity for application procedure.
June 2020	2	JW Chetty	Content within the guideline was re-worded to explain the benefits of mutual agreements between the applicants and ESKOM rather than the application being a legal obligation.

6. DEVELOPMENT TEAM

The following people were involved in the development of this document:

Jonathan Chetty (Mechanical Engineer)

Vivendhra Naidoo (Chief Engineer)

Dr Pieter Pretorius (Electrical Specialist)

John Geeringh (Snr Consultant Environ Mngt)

Bharat Haridass (Snr Consultant Engineer)

Riaz Vajeth (Snr Manager (Lines))

Bruce Ntshunsha (Chief Engineer)

David Tunncliff (Snr Manager L&R Acting)

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Savannah Public Process

From: Chumisa Njingana (SR) <NjinganaC@nra.co.za>
Sent: Sunday, November 22, 2020 4:15 PM
To: Savannah Public Process
Cc: Nenekazi Songxaba (SR)
Subject: RE: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of commencement of Basic Assessment and Public Participation Processes

Importance: High

Good day Nicolene

Hope all is well.

SANRAL has the following comments, with regards to the proposed above mentioned subject development, within the Blue Crane Local Municipality (R63/N10) and Makana Local Municipality (N2/R67):

- No installation of any infrastructure inside the Road Reserve.
- The wind turbines must be erected at least 200 metres from the Nation Road Reserve boundary, if this requirement cannot be met, then a good motivation has to be submitted to SANRAL as to why the wind turbines should be erected closer.
- All other buildings / structures should be erected at least 60 metres from the National Road Reserve boundary and / or 500 metres from any intersection.
- If access is required from the National Road, an approval from SANRAL is required, otherwise access can be obtained from the nearest numbered route.
- A formal application together with the plans of the proposed wind farm must be submitted to SANRAL.
- Construction of all work may only commence after written approval has been obtained from SANRAL.

Kind regards
Chumisa

Chumisa Njingana (SR)
ENGINEERING

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njinganac@nra.co.za | www.sanral.co.za
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From: Mpati Makoa (HO)
Sent: 18 November 2020 08:09 AM
To: Chumisa Njingana (SR) Amanda Mboniswa (SR)
Cc: Nenekazi Songxaba (SR)
Subject: FW: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of commencement of Basic Assessment and Public Participation Processes

Good morning ladies

Please see attached for your information and attention.

Kind regards
Mpati

From: Public Process <publicprocess@savannahsa.com>
Sent: Tuesday, November 17, 2020 5:03 PM
To: Mpati Makoa (HO)
Subject: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of commencement of Basic Assessment and Public Participation Processes

DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES BETWEEN SOMERSET EAST AND MAKHANDA, EASTERN CAPE PROVINCE

Dear Interested and Affected Parties,

A cluster of renewable energy facilities is proposed to be developed on various project sites located between Somerset East and Makhanda within the Cookhouse Renewable Energy Development Zone (REDZ), as well as the Eastern Strategic Transmission Corridor. The cluster consists of nine (9) projects which includes six (6) wind farms, two (2) solar energy facilities and one (1) Main Transmission Substation (MTS). A suitable project site for each development has been identified by the project development companies and the entire

extent of the projects is located within the Sarah Baartman District Municipality. The western section is located within the Blue Crane Route Local Municipality and the eastern section within the Makana Local Municipality.

Please find attached the Background Information Document which provides additional information regarding the application for the six (6) wind energy facilities, the two (2) solar energy facilities and the 400MW Main Transmission Substation.

We kindly request you to complete the attached stakeholder registration and comment form to formally register on the project databases and indicate in which of the nine (9) projects (or all) your interest lies.

Please do not hesitate to contact us should you require additional information and/or clarification regarding the projects. Our team welcomes your participation and look forward to your involvement throughout this process.

Kind regards,

[Unsubscribe this type of email](#)



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f: 086 684 0547

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Public Process

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SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

Eastern Cape Parks & Tourism Agency

Savannah Public Process

From: Savannah Public Process
Sent: Tuesday, January 5, 2021 1:14 PM
To: 'Shanè Gertze'
Cc: Malaika Koali-Lebona
Subject: CLUSTER OF RENEWABLE ENERGY FACILITIES: .KMZ of project localities
Attachments: SE2602-Affected properties - I&AP Distribution (Dec 2020).kmz

Dear Shanè,

Firstly, please accept our apologies for the delay in providing the Eastern Cape Parks & Tourism Agency with the request .KMZ file.

Attached the .KMZ file as requested.

Shanè, it will be appreciated if you can provide us with the following information (data files/shape files/link to applicable page on your website):

- Informal and/or private nature reserves within the study area of the above-mentioned developments in the Eastern Cape; and
- A .KMZ file for Kwandwe Private Nature Reserve. It was brought under our attention that the information we obtained from the DEFF (DEA) database is incorrect.

Kind regards,

From: Shanè Gertze
Sent: Thursday, December 3, 2020 3:02 PM
To: Savannah Public Process <publicprocess@savannahsa.com>
Cc: Malaika Koali-Lebona
Subject: FW: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of commencement of Basic Assessment and Public Participation Processes

Hi Nicolene

Can you please a kml/kmz file of the localities for this proposed project.

Many thanks,

Shanè Gertze
Environmental Planner

Eastern Cape
PARKS & TOURISM AGENCY

www.visiteasterncape.co.za



From: Public Process [<mailto:publicprocess@savannahsa.com>]

Sent: 17 November 2020 05:05 PM

To: Andre Van der Spuy

Subject: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of commencement of Basic Assessment and Public Participation Processes

**DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES BETWEEN SOMERSET EAST AND MAKHANDA,
EASTERN CAPE PROVINCE**

Dear Interested and Affected Parties,

A cluster of renewable energy facilities is proposed to be developed on various project sites located between Somerset East and Makhanda within the Cookhouse Renewable Energy Development Zone (REDZ), as well as the Eastern Strategic Transmission Corridor. The cluster consists of nine (9) projects which includes six (6) wind farms, two (2) solar energy facilities and one (1) Main Transmission Substation (MTS). A suitable project site for each development has been identified by the project development companies and the entire extent of the projects is located within the Sarah Baartman District Municipality. The western section is located within the Blue Crane Route Local Municipality and the eastern section within the Makana Local Municipality.

Please find attached the Background Information Document which provides additional information regarding the application for the six (6) wind energy facilities, the two (2) solar energy facilities and the 400MW Main Transmission Substation.

We kindly request you to complete the attached stakeholder registration and comment form to formally register on the project databases and indicate in which of the nine (9) projects (or all) your interest lies.

Please do not hesitate to contact us should you require additional information and/or clarification regarding the projects. Our team welcomes your participation and look forward to your involvement throughout this process.

Kind regards,

[Unsubscribe this type of email](#)



t: 011 656 3237
f: 086 684 0547

Nicolene Venter
Public Process

e: publicprocess@savannahsa.com
c: +27 (0) 60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015



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INTERESTED AND AFFECTED PARTIES

Savannah Public Process

From: Savannah Public Process
Sent: Tuesday, February 23, 2021 1:59 PM
To: 27728896405
Subject: RE: public participation notice.

Dear Sir,

This e-mail serves to confirm our telephone discussion a few minutes ago in which I requested your name and surname to register you on the projects' databases and to inform you of the availability of the Basic Assessment Reports.

You informed us that there is no need to obtain your information and that the matter can be considered attended to.

Kind regards,



t: +27 (0)11 656 3237
f: +27 (0) 86 684 0547

Nicolene Venter
Public Process

e: Publicprocess@savannahsa.com
c: +27 (0)60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

From: 27728896405
Sent: Thursday, November 12, 2020 11:29 AM
To: Savannah Public Process <publicprocess@savannahsa.com>
Subject: public participation notice.

I suggest that your half page advert in The Herald today is possibly not legal. The headline refers to an area between Somerset East and a town that I believe no longer exists. Perhaps you should consult your lawyers on the matter to ascertain the correctness of the issue.

Sent from my Galaxy

Savannah Public Process

From: Savannah Public Process
Sent: Wednesday, November 18, 2020 4:32 AM
To: Jessica Els
Cc: Ronald Baloyi
Subject: RE: Development of a Cluster of Renewable Energies Between Somerset East and Grahamstown, Eastern Cape

Tracking:	Recipient	Delivery
	Jessica Els	
	Ronald Baloyi	Delivered: 11/18/2020 4:32 AM

Dear Jadon,

Hope you are keeping well!

Jadon, as requested by Jessica below, please see the release code below.

Kind regards,

From: Jessica Els
Sent: Tuesday, November 17, 2020 2:35 PM
To: Savannah Public Process <publicprocess@savannahsa.com>
Cc: Ronald Baloyi <Ronald@savannahsa.com>
Subject: Re: Development of a Cluster of Renewable Energies Between Somerset East and Grahamstown, Eastern Cape

Hi Nicolene

Please can you send the release code to Jadon as well? -

Thanks
Jessica

On Tue, Nov 17, 2020 at 1:19 PM Savannah Public Process <publicprocess@savannahsa.com> wrote:

Hi Jessica,

Correct – we have schedule the release of the BID today.

Herewith the release code: **3dLVEW**

Kind regards,

From: Jessica Els <
Sent: Monday, November 16, 2020 8:18 AM
To: Savannah Public Process <publicprocess@savannahsa.com>
Cc: Ronald Baloyi <Ronald@savannahsa.com>
Subject: Re: Development of a Cluster of Renewable Energies Between Somerset East and Grahamstown, Eastern Cape

Hi Nicolene

Thanks - I trust you had a good weekend.

Will we receive a unique code to view the public documents on your site?

Kind regards

Jessica

On Fri, Nov 13, 2020 at 8:49 PM Savannah Public Process <publicprocess@savannahsa.com> wrote:

Hi Jessica,

We herewith acknowledge receipt of Jadon's registration and please find attached proof of registration.

Kind regards,

From: Jessica Els
Sent: Friday, November 13, 2020 2:42 PM
To: Savannah Public Process <publicprocess@savannahsa.com>
Cc: Ronald Baloyi <Ronald@savannahsa.com>
Subject: Re: Development of a Cluster of Renewable Energies Between Somerset East and Grahamstown, Eastern Cape

Hi Nicolene

My colleague asked that you register him as well, please. Attached is his form.

Kind regards

Jessica

On Fri, Nov 13, 2020 at 9:54 AM Jessica Els wrote:

Hi Nicolene

Thank you so much. Please see attached.

Kind regards

Jessica

On Thu, Nov 12, 2020 at 3:42 PM Savannah Public Process <publicprocess@savannahsa.com> wrote:

Dear Jessica,

Thank you for your request below.

Would you please be so kind and complete the attached registration form and return to us via e-mail.

Kind regards,

t: 011 656 3237
f: 086 684 0547

e: publicprocess@savannahsa.com
c: +27 (0) 60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

From: Jessica Els
Sent: Thursday, November 12, 2020 10:36 AM
To: Savannah Public Process <publicprocess@savannahsa.com>
Subject: Re: Development of a Cluster of Renewable Energies Between Somerset East and Grahamstown, Eastern Cape

Hi Nicolene

Please could you also add me to the list of I&AP's.

Thanks

Jessica

On Thu, Nov 12, 2020 at 10:31 AM Jessica Els

wrote:

Hi Nicolene

I trust you are well.

I was just looking at your cluster of renewable energy projects project and was wondering if all the wind farms are being developed by 1 developer or multiple developers?

Kind regards

Jessica

BASIC ASSESSMENT PROCESSES AND PUBLIC PARTICIPATION PROCESS

DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES BETWEEN SOMERSET EAST AND MAKHANDA, EASTERN

November 2020

Return completed registration and comment form to: **Nicolene Venter** or **Ronald Baloyi** of **Savannah Environmental**

Phone: 011 656 3237 / **Mobile (incl. 'please call me'):** 060 978 8396 / **Fax:** 086 684 0547

E-mail: publicprocess@savannahsa.com **Postal Address:** PO Box 148, Sunninghill, 2157

Your registration as an interested and/or affected party will be applicable for this project only and your contact details provided are protected by the PoPI Act of 2013

Please provide your complete contact details:

Name &	Neale Howarth
Surname:	
Organisation:	INDALO Protected Environment
Designation:	Chairman
Postal Address:	
Telephone:	
Mobile:	
E-mail:	

Please indicate on which project/s you would like to register as an interested and affected party (I&AP)?
(please tick the relevant box)

Wind Farms

Hamlet	<input type="checkbox"/>	Rippon	<input type="checkbox"/>	Redding	<input type="checkbox"/>	Aeolus	<input type="checkbox"/>	Wind Garden	<input checked="" type="checkbox"/>	Fronteer	<input checked="" type="checkbox"/>
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Solar Energy Facilities

Solaris Fields	<input type="checkbox"/>	Sun Garden	<input type="checkbox"/>
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REDZ 3 Power Grid Corridor 400MTS

Grid Connection Corridor	<input type="checkbox"/>
--------------------------	--------------------------

Note: In terms of EIA Regulations, 2014, as amended, Regulation 43(1), you are required to register as an I&AP to receive further correspondence regarding the Basic Assessment process and comment on the Reports being made available for comments, and to disclose any direct business, financial, personal or other interest which you may have in the approval or refusal of the application (add additional pages if necessary):

PLEASE TURN OVER PAGE

Please list your comments regarding the Environmental Impact Assessment process (add additional pages if necessary):

Major affect on tourism based game reserves.
Has direct impact on grading of our lodges,
but more importantly, the noise & danger impact
on our flora & fauna.

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

Name & Surname:	
Postal Address:	
Telephone:	
Mobile:	
E-mail:	

Savannah Public Process

From: Savannah Public Process
Sent: Wednesday, November 18, 2020 1:13 PM
To:
Cc: Ronald Baloyi
Subject: RE: Registration as an IAP for Development of a Cluster of Renewable Energies Between Somerset East and Makhandha, Eastern Cape
Attachments: EASPE-HOBSON Stevon (2020.11.18).pdf; SE2602-WindRelic RegCommForm-FINAL.pdf

Tracking:	Recipient	Delivery
	Ronald Baloyi	Delivered: 11/18/2020 1:13 PM

Dear Stevon,

Please receive herewith confirmation that you are registered as an interested and affected party on the above-projects databases as requested.

Would you please be so kind and complete the attached registration form by indicating in which project (or all projects) you would like to register for.

Kind regards,

From: Stevonh@easpe.co.za
Sent: Wednesday, November 18, 2020 8:44 AM
To: Savannah Public Process <publicprocess@savannahsa.com>
Subject: Registration as an IAP for Development of a Cluster of Renewable Energies Between Somerset East and Makhandha, Eastern Cape

Good Morning Nicolene

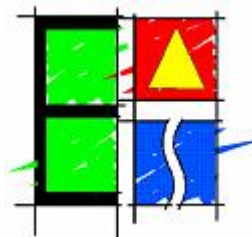
I trust this finds you well.

I would like to register as an Interested and Affected Party for the Development of a Cluster of Renewable Energies Between Somerset East and Makhandha, Eastern Cape Project.

As an Eastern Cape resident I have a keen interest in the development of the province and these projects could bring much needed development and jobs to the region.

Regards,

Stevon Hobson
Engineering Advice & Services (Pty) Ltd



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Savannah Public Process

From: Savannah Public Process
Sent: Wednesday, November 18, 2020 1:06 PM
To:
Cc: Tsheko Ratsheko; Ronald Baloyi
Subject: Interest in renewable energy projects: Confirmation of Registration
Attachments: ARMINCO-BRITCHFORD Grahame (2020.11.18).pdf; SE2602-WindRelic RegCommForm-FINAL.pdf

Tracking:	Recipient	Delivery
	Tsheko Ratsheko	
	Ronald Baloyi	Delivered: 11/18/2020 1:06 PM

Dear Grahame,

Please receive herewith confirmation that you are registered as an interested and affected party on the above-projects databases as requested.

Would you please be so kind and complete the attached registration form by indicating in which project (or all projects) you would like to register for.

Kind regards,

From: grahame@armincopiping.com <grahame@armincopiping.com>
Sent: Wednesday, November 18, 2020 9:31 AM
To: Savannah Public Process <publicprocess@savannahsa.com>
Cc: Tsheko Ratsheko
Subject: Interest in renewable energy projects

Good day

I would like to register on this platform in order to participate in public commentary and to gain more information on renewable energy projects.

My company is a specialist piping fabricator and constructor and we, as a team, would like to engage in more renewable energy projects as opportunities present themselves. Our interests lie in wind, Solar and gas to power projects.

Many thanks

Warmest Regards

Grahame Britchford

 **arminco**
ARMINCO PIPING PROJECTS
Project Managers; Fabricators and Constructors
A Level 2 B-BBEE Contributor

BASIC ASSESSMENT PROCESSES AND PUBLIC PARTICIPATION PROCESS

DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES BETWEEN SOMERSET EAST AND MAKHANDA,
EASTERN

November 2020

Return completed registration and comment form to: **Nicolene Venter** or **Ronald Baloyi** of **Savannah Environmental**

Phone: 011 656 3237 / Mobile (incl. 'please call me'): 060 978 8396 / Fax: 086 684 0547

E-mail: publicprocess@savannahsa.com Postal Address: PO Box 148, Sunninghill, 2157

Your registration as an interested and/or affected party will be applicable for this project only and your contact details provided are protected by the PoPI Act of 2013

Please provide your complete contact details:

Name &	
Surname:	ANGUS IAN SHOLTO-DOUGLAS
Organisation:	C-SA PROPERTIES (PTY) LTD
Designation:	MANAGING DIRECTOR
Postal Address:	
Telephone:	
Mobile:	
E-mail:	

Please indicate on which project/s you would like to register as an interested and affected party (I&AP)? (please tick the relevant box)

Wind Farms

Hamlet	<input type="checkbox"/>	Rippon	<input type="checkbox"/>	Redding	<input type="checkbox"/>	Aeolus	<input type="checkbox"/>	Wind Garden	<input checked="" type="checkbox"/>	Fronteer	<input checked="" type="checkbox"/>
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Solar Energy Facilities

Solaris Fields	<input type="checkbox"/>	Sun Garden	<input type="checkbox"/>
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REDZ 3 Power Grid Corridor 400MTS

Grid Connection Corridor	<input checked="" type="checkbox"/>
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Note: In terms of EIA Regulations, 2014, as amended, Regulation 43(1), you are required to register as an I&AP to receive further correspondence regarding the Basic Assessment process and comment on the Reports being made available for comments, and to disclose any direct business, financial, personal or other interest which you may have in the approval or refusal of the application (add additional pages if necessary):

PLEASE TURN OVER PAGE

Please list your comments regarding the Environmental Impact Assessment process (add additional pages if necessary):

- We require the BA before final comments.
- The map of Kwandwe Protected Environment is incorrect.
- The impact of a WEF on a border of a PE and in the Biodiversity expansion corridor is of grave concern and questionable intent.
- We reserve all our rights to strongly oppose this poorly conceived plan which has failed twice before.

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

Name & Surname:

Postal Address:

Telephone:

Mobile:

E-mail:

Savannah Public Process

From: Savannah Public Process
Sent: Friday, November 20, 2020 9:12 AM
To: Angus Sholto-Douglas; Ronald Baloyi
Cc:
Subject: RE: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Acknowledgement of Registration and Comments

Tracking:	Recipient	Delivery
	Angus Sholto-Douglas	
	Ronald Baloyi	Delivered: 11/20/2020 9:12 AM

Dear Angus,

In response to the comments submitted on your registration and comment form please be informed that the Basic Assessment (BA) processes only recently commenced (14 November), including the independent specialist assessments. It is envisaged that the BARs will be available for review and comment in the first quarter of 2021 and as a registered I&AP you will receive notification of the details thereof.

Your comments submitted in the registration and comment form will be considered and addressed in the respective Basic Assessment study (including the relevant specialist studies) and will be included in the comments and responses reports, as per the projects you have indicated to be registered for.

Please do not hesitate to contact us should you require any additional information or clarification regarding the BA process.

Kind regards,

From: Angus Sholto-Douglas
Sent: Thursday, November 19, 2020 11:02 AM
To: Savannah Public Process <publicprocess@savannahsa.com>; 'Public Participation' <public.participation@ecpta.co.za>; Ronald Baloyi <Ronald@savannahsa.com>
Cc: R
Subject: RE: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Acknowledgement of Registration and Comments

Many thanks Nicolene

When can we expect to receive the Basic Assessment so we can comment on the detail of the proposed development?

Regards

Angus

From: Savannah Public Process [<mailto:publicprocess@savannahsa.com>]
Sent: 19 November 2020 02:39 AM
To: Angus Sholto-Douglas; 'Public Participation'; Ronald Baloyi
Cc:
Subject: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Acknowledgement of Registration and Comments

Dear Angus,

Please receive herewith acknowledgement of receipt of your registration and the comments submitted.

The comments have been forwarded to the project team.

Kind regards,



t: 011 656 3237
f: 086 684 0547

Nicolene Venter
Public Process

e: publicprocess@savannahsa.com
c: +27 (0) 60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

From: Angus Sholto-Douglas

Sent: Wednesday, November 18, 2020 3:02 PM

To: 'Public Participation' <public.participation@ecpta.co.za>; Nicolene Venter <nicolene@savannahsa.com>; Ronald Baloyi <Ronald@savannahsa.com>

Cc

Subject: FW: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of commencement of Basic Assessment and Public Participation Processes

Dear Nicolene and Ronald

Please see the attached document and acknowledge receipt.

Many thanks

Angus

ANGUS SHOLTO-DOUGLAS



Heatherton Towers, Kwandwe Private Game Reserve, Fort Brown District, Eastern Cape, 6140, South Africa

BASIC ASSESSMENT PROCESSES AND PUBLIC PARTICIPATION PROCESS

DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES BETWEEN SOMERSET EAST AND MAKHANDA,
EASTERN

November 2020

Return completed registration and comment form to: **Nicolene Venter** or **Ronald Baloyi** of **Savannah Environmental**

Phone: 011 656 3237 / **Mobile (incl. 'please call me'):** 060 978 8396 / **Fax:** 086 684 0547

E-mail: publicprocess@savannahsa.com **Postal Address:** PO Box 148, Sunninghill, 2157

Your registration as an interested and/or affected party will be applicable for this project only and your contact details provided are protected by the PoPI Act of 2013

Please provide your complete contact details:

Name &	HENDRIK OVENDAAL.
Surname:	
Organisation:	CSA PROPERTIES.
Designation:	GENERAL MANAGER
Postal Address:	
Telephone:	
Mobile:	
E-mail:	

Please indicate on which project/s you would like to register as an interested and affected party (I&AP)?
(please tick the relevant box)

Wind Farms

Hamlet	<input type="checkbox"/>	Rippon	<input type="checkbox"/>	Redding	<input type="checkbox"/>	Aeolus	<input type="checkbox"/>	Wind Garden	<input checked="" type="checkbox"/>	Fronteer	<input checked="" type="checkbox"/>
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Solar Energy Facilities

Solaris Fields	<input type="checkbox"/>	Sun Garden	<input type="checkbox"/>
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REDZ 3 Power Grid Corridor 400MTS

Grid Connection Corridor	<input type="checkbox"/>
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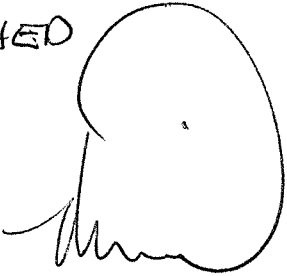
Note: In terms of EIA Regulations, 2014, as amended, Regulation 43(1), you are required to register as an I&AP to receive further correspondence regarding the Basic Assessment process and comment on the Reports being made available for comments, and to disclose any direct business, financial, personal or other interest which you may have in the approval or refusal of the application (add additional pages if necessary):

PLEASE REFER TO ATTACHED ANNEXURE A.

PLEASE TURN OVER PAGE

Please list your comments regarding the Environmental Impact Assessment process (add additional pages if necessary):

PLEASE REFER TO ATTACHED
ANNEXURE A.



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

Name & Surname:

Postal Address:

Telephone:

Mobile:

E-mail:



Kwandwe Private Game Reserve lies in the Great Fish River Valley, east of the R67 between Grahamstown and Fort Beaufort. Presently Kwandwe permanently employs 260 people, most of who originate from the immediate area. Kwandwe has made significant investment in the local economy, including, but not limited to the Fort Brown Primary School, the Mgcamabele Community Centre and the establishment of the Ubunye Foundation.

Kwandwe and its subsidiaries inject an average R3,8million per month directly into the Makhanda economy through salaries and support of local business.

Kwandwe has numerous neighbours who will also be adversely affected by the proposed Wind Garden and Fronteer Wind Farms, namely Clifton Wildlife Estate, Hay Lodge, Lukhanyo Game Reserve, Vaalkrans Game Reserve, Lanka Safaris, Hellspoor Game Reserve, Woodlands Safari Estate and Ezulu.

Kwandwe prides itself on a conservation record that has spanned twenty years, conserving a wide variety of endangered species. Renewable energy is of critical importance to our planet and we as a group support this. We do, however, believe that Wind Energy Facilities need to be placed responsibly where minimal impact on the avifauna and wildlife based tourism ventures occurs.

We firmly believe that the position of these WEF's, will have significant impact on the tourism ventures of our greater area, especially Kwandwe Private Game Reserve.

1. THE VISUAL IMPACT OF THE PROPOSED FRONTEER AND WIND GARDEN WEF'S.

The clientele of Kwandwe is made up of mainly international guests, bringing much needed foreign currency into our economy. These guests are looking for experiences in wildlife areas that have as little exposure to visual and sound pollution. The proposed 130m high masts on the ridges on our south-western boundary will consequently detract from the sense of place and wildness of the experience we offer to our guests and have gained a reputation for over the past twenty years.

The Socio-Economic value of private game reserves in the Eastern Cape is well researched and studied by:

2.1

Nelson Mandela University, Centre for African Conservation Ecology Report No. 60, August 2011 titled "Combining conservation and socio-economic development: An assessment of eco-tourism-based private game reserves in the Eastern Cape by Andrew Muir; Andrew Skowno and Graham Kerley

2.2

Centre of African Conservation Ecology Report No 56. "COMBINING CONSERVATION AND DEVELOPMENT ON PRIVATE LANDS: AN ASSESSMENT OF ECOTOURISMBASED PRIVATE GAME RESERVES IN THE EASTERN CAPE" by Jeffrey A. Langholz and Graham Kerley.

2.3

J. D. Snowball and G. G. Antrobus: (2008) Ecotourism and Socio-economic development: The impact of the conservation, economic and social activities of private game reserves in the Eastern Cape. Rhodes University, Department of Economics and Economic History.

Renato Johnsson's paper "The Benefits of Wildlife Tourism in the Eastern Cape." (unpublished) refers. Johnsson's paper comments on the Socio-economic studies conducted above.

2.4 A 2019 Socio-Economic Research paper will be published by Rhodes University later in the year, giving an updated perspective on the socio-economic value of Private Game Reserves in the Eastern Cape.

2. NEGATIVE IMPACT ON ECO-TOURISM

Private Game Reserves are an important magnet that attracts tourists to the region, notably foreign tourists. For a large proportion of the estimated 1.5 million foreign tourists who visit South Africa every year, **scenery and wildlife** is the primary attraction, with 45% of them visiting at least one wildlife or nature reserve during their trip (Hall, 2007 cited in Indalo 2008.)

Ecotourism, as opposed to agriculture is an activity more likely to achieve economic and ecological sustainability in the long run, with greater benefits for the local communities in terms of employment, empowerment and general upliftment.

The original TERU report of 2004 found that ecotourism-based game farming has long been described as a sustainable alternative to livestock farming, especially in semi-arid areas – such as in the Eastern Cape - where low rainfall precludes cropping and livestock production is marginal. The study finds that:

"As a land- use, eco-tourism-based game farming is an economically and ecologically desirable alternative to other land uses, including mohair and dairy farming. Not only does it generate more income per unit area, but it also creates more jobs that are better paid." (2004: 20) "Private Game Reserves seek to blend earnings with ecology and business with biodiversity" (2006: 4)

This report provides the main findings of the studies; the employment effects of the conversion from farming to ecotourism resulted in more and better jobs being created, and

which has featured the upskilling of local workers in order for the local communities to be able to become involved in the ecotourism ventures. The studies also revealed the contribution of ecotourism to the wider economy, including attracting tourists to stay in the region longer. The move towards eco-tourism has further increased the conservation estate in the Province and provides for the conservation of the rural wildlife for the enjoyment of future generations.

3. IMPACT ON COMMUNITY OUTREACH PROGRAMMES AND EMPLOYMENT

Another important feature of the private game reserves of the INDALO association, which was highlighted in the study conducted by Rhodes University, was the extent to which PGRs have developed linkages with the communities in their area, “not because of any legal requirement, but rather from a sense of corporate responsibility.”

“A lesser known feature of Indalo PGRs is the extent of their engagement in community outreach programmes. All the reserves in the study reported some involvement in current community development projects. The engagement includes involvement with local institutions such as schools, taking less privileged children on game drives, in environmental and conservation awareness programmes, AIDs education, facilitating volunteer programmes at an AIDs orphanage, training of family members in small business activities and providing outlets for the sale of products such as vegetables and curios, and sponsoring recreational facilities and activities”.

From the onset the INDALO Private Game Reserves have demonstrated a commitment to job creation and community development through the retraining and conversion of their local workers to make the change from agriculture to the tourism industry. This includes employing local staff despite a lack of skills and, in many cases, illiteracy and providing them with skills training.

For most of the INDALO PGRs strict human resource and procurement policies are in place to employ previous farm workers and to recruit staff from the local community, with a long-term objective to implement skills development and employment equity plans. Due to a lack of hospitality-related skills, substantial in-house training is required. Training may take as long as 18 months to 5 years. Skills required on the PGRs include an ability to speak English, numeracy, literacy, hospitality skills, game ranging, security, anti-poaching, chef skills and public relations.

While the reliance on local rural population to provide an upscale tourism service presents a daunting challenge, the 2006 report considers that INDALO PGRs “are finding creative ways to meet tourists’ high expectations for superb service while also honoring their commitment to local communities.”

4. IMPACT ON WIDER ECONOMY AND SOCIAL STRUCTURE

Ecotourism's Contribution to the Wider Economy:

There is an urgent need for national and provincial government to acknowledge the important contribution this industry is making towards the country's economy. The studies have shown that 3 500 people are dependent on income gained working in Private Game Reserves (PGR's). In terms of multiplier effects the revenue generated by these eco-tourism businesses translates into an infusion of R180 million into the regional economy

Multiplier effects occur in the economy because guests to PGRs purchase further items during their time in the Eastern Cape. These includes buying crafts and souvenirs, staying in hotels, renting cars, buying petrol, purchasing clothes, visiting other attractions, and dining in restaurants. Therefore the tourists' true economic impact in the region is much wider than what is spent at the PGRs.

The INDALO studies sought to determine the general contribution to the economy by the visitors attracted to the region by the private game reserves. The 2004 study estimated that a 70% multiplier effect applied to gross incomes of R87.2 million generated by 12 existing PGRs in 2002/2003 would imply that visitors made direct and indirect expenditures close to R150 million (2004: 16). The 2006 study, using the same equation, found that R105.8 million in revenue generated by PGRs in 2004/2005 translates into a total infusion of R180 million into the regional economy (2006: 12). The spending of overseas guests also generates important foreign exchange earnings for the South Africa treasury.

In addition to economic multiplier effects there are also social multiplier effects, the study by the University of Port Elizabeth remarked:

"Eco-tourism lends itself very well to developing and building partnerships with communities. An array of potential initiatives exists, with regard to previously disadvantaged communities and informal settlements within and around the PGRs. Potential initiatives include promoting development in townships/settlements through arts and crafts; introducing local children to environmental education; conservation outreach programs within the communities themselves and linkages with teachers in local schools."

5. KWANDWE PRIVATE GAME RESERVE

Kwandwe's website introduction is as follows:

"Nestled in the heart of South Africa's unspoilt Eastern Cape province lies Kwandwe Private Game Reserve, a world-class Big Five safari destination. The 22,000 hectares of pristine private wilderness stretches either side of the Great Fish River which meanders for 30

kilometres through scenic landscape and comprises just twenty-six rooms split across five very individual and distinct safari lodges and villas, according it one of the highest land to guest ratios in South Africa. Renowned for quality guiding, understated luxury and the thousands of animals and wildlife that call the Reserve home, Kwandwe offers a range of safari activities and accommodation options to make every African Dream come true".

www.kwandwe.com

Kwandwe is committed to making a positive and lasting difference in the rural Eastern Cape, one of South Africa's least developed provinces. Working through its social development partner, the Ubunye Foundation, Kwandwe invests in projects that improve lives and create sustainable livelihoods opportunities in marginalised rural communities.

www.ubunyefoundation.co.za <https://youtu.be/D-HvZulvFU>

Kwandwe has been trading for 18 years and has an established track record of conservation and community development. These efforts have led to Kwandwe being declared a **Protected Environment**. There is a projected further 6,500 hectares that will be added into the Kwandwe Protected Environment, this will be done on the basis that we are secure in the knowledge that the sense of place and "wildness" of the Great Fish River Valley is not compromised by visual pollution.

It is our proposal that Protected Environments should receive protection from the visual pollution of WEF and **an exclusion zone of at least ten kilometers around all Protected Environments** should be observed. This said, should a proposed WEF still pose a significant visual threat to the business activity, this exclusion zone should be considered on the merits of each application.

Every guest staying at Kwandwe makes a direct contribution to community development through the Conservation and Community Levy (funds raised from this levy are split equally between these two initiatives).

Kwandwe Private Game Reserve firmly believes that WEF's in the two areas proposed above, pose a significant threat to their eco-tourism business. The visual impact of turbines is well-documented, and it is believed that such visual impact will result in reduced numbers of tourists visiting the private game reserve, which will in turn result in a reduction of employment.

The Wildlife Economy Lab run by the National Department of Environmental Affairs and the Department of Tourism plotted out an ambitious and attainable plan, which has been endorsed by all stake holders. There is a green economy that underpins the rural economy, it is clearly evident in the Great Fish River Valley with consumptive use, non-consumptive eco-tourism as well as Provincial Nature Reserves. It is clear that a sustainable and long-

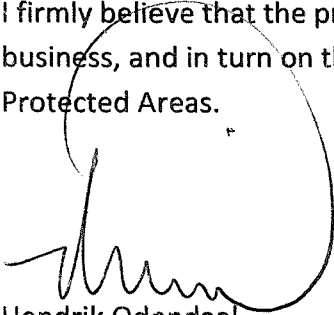
standing wildlife economy has been developed.

6. In conclusion

President Cyril Ramaphosa stated that the tourism sector "... is a sector that is thriving and that has tremendous potential for further growth and for the creation of jobs. There is growing global consensus on the need for countries to pursue paths of sustainable development, to grow and transform our respective economies while minimising our impact on nature.

Tourism has an extensive value chain, stimulating economic activity in manufacturing, in the services sector and in the creative and cultural industries. We have set ourselves a bold target to raise over \$100 billion in new investment over five years. Tourism plays a critical role in that strategy." 4 May 2019, South African Tourism Indaba, Durban.

I firmly believe that the proposed WEF's pose a significant threat to our eco-tourism business, and in turn on the valuable socio-economic role of Private Game Reserves and Protected Areas.



Hendrik Odendaal
General Manager,
C-SA Properties (Pty) Ltd.

Kwandwe Private Game Reserve

Savannah Public Process

From: Savannah Public Process
Sent: Thursday, November 26, 2020 3:33 AM
To: Taylor Shaun
Cc: Nicolene Venter; Ronald Baloyi; savannahenvironmentalsa@gmail.com; Nicolene Venter
Subject: RE: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of commencement of Basic Assessment and Public Participation Processes
Attachments: SE2602 Wind Relic BID (Eng).pdf; SE2602-WindRelic RegCommForm-FINAL.pdf

Tracking:	Recipient	Delivery
	Taylor Shaun	
	Nicolene Venter	Delivered: 11/26/2020 3:33 AM
	Ronald Baloyi	Delivered: 11/26/2020 3:33 AM
	savannahenvironmentalsa@gmail.com	
	Nicolene Venter	

Dear Shaun,

The applicants are:

Project Name	Hamlett Wind Farm	Ripponn Wind Farm	Redding Wind Farm	Aeolus Wind Farm	Wind Garden Wind Farm	Fronteer Wind Farm	REDZ 3 Power Corridor 400MTS	Solaris Fields Solar Energy Facility	Sun Garden Solar Energy Facility
Applicant	Hamlett (Pty) Ltd	Ripponn (Pty) Ltd	Redding Wind (Pty) Ltd	Aeolus (Pty) Ltd	Wind Garden (Pty) Ltd	Fronteer (Pty) Ltd	Wind Relic (Pty) Ltd	Solaris Fields (Pty) Ltd	Sun Garden (Pty) Ltd

Please find attached the Background Information Document which will provide enel with additional information regarding the proposed developments.

It will be appreciated if you can please complete the attached registration form by indicating in which (or all) of the projects your interest lies.

Kind regards,

From: Taylor Shaun
Sent: Saturday, November 21, 2020 1:52 PM
To: Savannah Public Process <publicprocess@savannahsa.com>
Cc: Nicolene Venter <nicolene@savannahsa.com>; Ronald Baloyi <Ronald@savannahsa.com>; savannahenvironmentalsa@gmail.com; Nicolene Venter <nicolene@savannahsa.com>
Subject: RE: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of commencement of Basic Assessment and Public Participation Processes

Thank you Nicolene

Could you please provide details about who the applicant is?

Regards

Shaun Taylor
Pr. Nat. Sci (Reg No: 118409)
Environment, Archaeology & Biodiversity
South Africa



102 Rivonia Road, Sandton
2196, Johannesburg

From: Public Process [<mailto:publicprocess@savannahsa.com>]

Sent: Wednesday, 18 November 2020 01:50

To: Taylor Shaun <Taylor Shaun <

Cc: nicolene@savannahsa.com; ronald@savannahsa.com; savannahenvironmentalsa@gmail.com; Nicolene Venter <nicolene@savannahsa.com>

Subject: DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of commencement of Basic Assessment and Public Participation Processes

**DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES BETWEEN SOMERSET EAST AND MAKHANDA,
EASTERN CAPE PROVINCE**

Dear Shaun,

A cluster of renewable energy facilities is proposed to be developed on various project sites located between Somerset East and Makhanda within the Cookhouse Renewable Energy Development Zone (REDZ), as well as the Eastern Strategic Transmission Corridor. The cluster consists of nine (9) projects which includes six (6) wind farms, two (2) solar energy facilities and one (1) Main Transmission Substation (MTS). A suitable project site for each development has been identified by the project development companies and the entire extent of the projects is located within the Sarah Baartman District Municipality. The western section is located within the Blue Crane Route Local Municipality and the eastern section within the Makana Local Municipality.

As per your telephone request to our colleague, Gideon Raath, yesterday afternoon to be registered on the above-mentioned projects, please find attached the Background Information Document which provides additional information regarding the application for the six (6) wind energy facilities, the two (2) solar energy facilities and the 400MW Main Transmission Substation.

We kindly request you to complete the attached stakeholder registration and comment form to formally register on the project databases and indicate in which of the nine (9) projects (or all) your interest lies.

Please do not hesitate to contact us should you require additional information and/or clarification regarding the projects. Our team welcomes your participation and look forward to your involvement throughout this process.

Kind regards,



t: 011 656 3237
f: 086 684 0547

Nicolene Venter
Public Process

e: publicprocess@savannahsa.com
c: +27 (0) 60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015