

APPENDIX C7:
Comments Received

Comments received on EIA Report
(To be included in the final EIA Report)

OUR REFERENCE : 20/9/2/3/1/087
YOUR REFERENCE : -
DFFE REFERENCE : 14/12/16/3/3/1/2114
ENQUIRIES : Cor van der Walt/Fadwa Mohammed

Savannah Environmental
Email: publicprocess@savannah.com

Att: Nicolene Venter

MERINO WIND FARM: DIVISION BEAUFORT WEST
PORTION 1 OF THE FARM RONDAVEL NO 85
PORTION 0 OF THE FARM RONDAVEL NO 85
PORTION 9 OF THE FARM BULT & RIETFontein NO 96
PORTION 0 OF THE FARM VOGELSTRUISFontein NO 84

Your application of May 2022 has reference.

The proposed renewable energy facilities are situated within the Northern Cape. A portion of the grid connection corridor is situated in the Western Cape. Therefore, the department must provide comment on this development.

The proposed grid infrastructure will facilitate the connection for the renewable energy facilities proposed in the Northern Province.

The Western Cape Department of Agriculture: Sub-programme Land Use Management has no objection to the proposed development on condition that the Impact Management Actions proposed in the EMPr be effectively implemented and monitored for compliance.

Please note:

- Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.

- The Department reserves the right to revise initial comments and request further information based on the information received.

Yours sincerely



Mr. E.J. van der Walt

LANDUSE MANAGER: LANDUSE MANAGEMENT

2022-08-26

Copies:

Department of Environmental Affairs & Development Planning

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BEAUFORT WEST

6970



forestry, fisheries & the environment

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

DFFE Reference: 14/12/16/3/3/2/2114

Enquiries: Mr Herman Alberts

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

Ms Jo-Anne Thomas
Savannah Environmental (Pty) Ltd
PO Box 148
SUNNINGHILL
2191

Telephone Number: 011 656 3237
Email Address: joanne@savannahsa.com

PER E-MAIL

Dear Ms Thomas

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF THE MERINO WIND FARM IN THE NORTHERN CAPE PROVINCE

The draft Environmental Impact Assessment Report (EIAr) dated May 2022 and received by this Department on 16 May 2022, refers.

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

(a) Specific comments

- (i) The final EIAr must ensure it includes and complies with and fulfils the requirements which enlisted the provision of regulation 3(7) of the EIA Regulations 2014 as amended. The final EIAr must clearly indicate where in the report the fulfilment of the requirement to enlist Regulation 3(7) can be found.
- (ii) Recommendations provided by specialist reports must be considered and used to inform the preferred layout alternative.
- (iii) Please provide a concise, but complete, summary and bullet list of the project description and associated infrastructure (or project scope) to be included in the decision (or as it should appear in the decision), should a positive Environmental Authorisation be granted. This must include a list of all development components and associated infrastructure.
- (iv) A list of what the proposed project entails as well as the associated infrastructure must be included in the EIAr.
- (v) The final EIAr must comply with all conditions of the acceptance of the Scoping Report (SR) and must address all comments contained in the draft SR and this letter.
- (vi) The final EIAr must clearly provide a detailed section which addresses the site sensitivity verification requirements where a specialist assessment is required but no specific assessment protocol has been prescribed as well as the site sensitivity verification and minimum report content requirements for all specialist assessments undertaken which was included in the screening tool report.

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- (vii) The EMPr must include a provision to make the following reports available to the Department and applicable competent authority on request: alien/invasive plant management report; plant rescue and protection report; and re-vegetation and habitat rehabilitation report.
- (viii) Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines.
- (ix) The EAP must provide details of the specific locations in the final EIAR, and not provide vague locations of the proposed developments. All associated infrastructure must be clearly indicated in the final EIAR and its associated layout plans.
- (x) The EAP must clearly identify and provide a final list of all applicable listed activities. If any activities are to be removed, motivation for their removal must be included in the final EIAR.
- (xi) The recommendations provided by the specialist reports must be considered and used to inform the preferred layout.
- (xii) With regards to the generic Environmental Management Programmes (EMPr) for the substation, Part B Section 2 and Part C is incomplete in the draft EIAR. Please sign the generic EMPs. We request that you adequately complete all applicable sections in the generic EMPs.

(b) Listed Activities

- (i) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed.
- (ii) If the activities applied for in the application form differ from those mentioned in the final EIAR, 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.dffe.gov.za/documents/forms>.
- (iii) It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.
- (iv) The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.

(c) Public Participation Process

- (i) The final EIAR must comply with all the conditions of the acceptance of the SR signed on 03 February 2022 and must address all comments contained in the final SR, the draft EIAR and this letter.
- (ii) Comments must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@dffe.gov.za.
- (iii) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the EIA Regulations, 2014, as amended.
- (iv) Please ensure that all issues raised and comments received during the circulation of the draft EIAR from registered Interested and Affected Parties (I&APs) and organs of state (including this Department's Biodiversity and Protected Area Sections), as listed in your I&APs Database, and others that have jurisdiction in respect of the proposed activity are adequately addressed and included in the final EIAR.
- (v) Copies of original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity are submitted to the Department with the final EIAR.
- (vi) Proof of correspondence with the various stakeholders must be included in the final EIAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. In terms of Regulation 41(2)(b) of the EIA Regulations, 2014, as amended, please provide proof of written notice for the availability of the EIAR for comment.

- (vii) All issues raised and comments received during the circulation of the draft EIAr from I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAr, including comments from this Department, and must be incorporated into a Comments and Response Report (CRR).
- (viii) The CRR report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter.
- (ix) Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as “noted” is not regarded as an adequate response to I&AP’s comments.
- (x) Minutes and attendance registers (where applicable) of any physical/virtual meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players must be included in the final EIAr.

(d) Alternatives

- (i) Please provide a clear description of each of the preferred alternatives and provide a detailed assessment and motivation on why it is preferred. This must include the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community.

(e) Layout and Sensitivity Maps

- (i) The final EIAr must provide 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.
- (ii) A copy of the final layout map must be submitted with the final EIAr. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible, e.g. roads. The layout map must indicate the following:
 - a) The envisioned area for the infrastructure, i.e. placing of infrastructure and all associated infrastructure should be mapped at an appropriate scale.
 - b) Location of turbines;
 - c) All supporting onsite infrastructure required such as laydown areas, roads etc. (existing and proposed);
 - d) Substation(s) and/or transformer(s) sites including their entire footprint;
 - e) Connection routes (including pylon positions) to the distribution/transmission network; and
 - f) All necessary details regarding all possible locations and sizes of the infrastructure.
 - g) All existing infrastructure on the site, especially internal road infrastructure.
- (iii) Please provide an environmental sensitivity map which indicates the following:
 - a) The location of sensitive environmental features on site, e.g. CBAs, protected areas, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;
 - b) Buffer areas; and
 - c) All “no-go” areas.
- (iv) The above layout map must be overlain with the sensitivity map and a cumulative map which shows neighbouring energy developments and existing grid infrastructure.
- (v) Google maps will not be accepted.

(f) Specialist assessments

- (i) The final EIAr and all the attached specialist studies must indicate and adequately assess a consistent number of turbines.
- (ii) The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:

- a) A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisations.
- b) Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.
- c) Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.
- d) Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
- e) **All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.**
- f) **Bird and Bat specialist studies must have support from Birdlife South Africa and SABAA.**
- g) Should a specialist recommend specific mitigation measures, these must be clearly indicated.
- (iii) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.
- (iv) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting in identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols") and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. **Please note that specialist assessments must be conducted in accordance with these protocols.**
- (v) As such, the Specialist Declaration of Interest forms must also indicate the scientific organisation registration/member number and status of registration/membership for each specialist.

(g) Cumulative Assessment

- (i) Should there be any other similar projects within a 30km radius of the proposed development site, a cumulative impact assessment for all identified and assessed impacts must be undertaken to indicate the following:
 - (a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.
 - (b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
 - (c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
 - (d) A cumulative impact environmental statement on whether the proposed development must proceed.

(h) Environmental Management Programme (EMPr)

- (i) It is drawn to your attention that 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 the Regulations must be used and submitted with the final report over and above the EMPr for the facility.

- (ii) The EMPr must comply with Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.
- (iii) The EMPr must also include the following:
 - a) All recommendations and mitigation measures recorded in the EIAr and the specialist studies conducted.
 - b) The final site layout map.
 - c) Measures as dictated by the final site layout map and micro-siting.
 - d) An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process.
 - e) A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.
 - f) An alien invasive management plan to be implemented during construction and operation. The plan must include mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal of alien species is undertaken.
 - g) A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a vegetation specialist familiar with the site and be implemented prior to commencement of the construction phase.
 - h) A re-vegetation and habitat rehabilitation plan to be implemented during construction and operation. Restoration must be undertaken as soon as possible after completion of construction activities to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats.
 - i) A traffic management plan to ensure that no hazards would result from the increased traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimize impacts on local commuters.
 - j) A storm water management plan to be implemented during construction and operation. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion. The plan must include the construction of appropriate design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows.
 - k) A fire management plan to be implemented during the construction.
 - l) An effective monitoring system to detect any leakage or spillage of all hazardous substances during their transportation, handling, use and storage. This must include precautionary measures to limit the possibility of oil and other toxic liquids from entering the soil or storm water systems.
 - m) Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.

(i) Specialist Declaration of Interest

- (i) Specialist Declaration of Interest forms must be attached to the final EIAr. 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).

(j) Undertaking of an Oath

- (i) Please note that the final EIAr must 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 3 of the NEMA EIA Regulations, 2014, as amended, which states that the EIAr 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”.*

General

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

Should you fail to meet any of the timeframes stipulated in Regulation 23 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



Ms Milicent Solomons
Acting Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Signed by: Mr Coenrad Agenbach
Designation: Deputy Director: Priority Infrastructure Projects
Date: 06 June 2022

cc:	Debere Maphosa	Ubuntu Local Municipality	E-mail: maphosa.d@gmail.com
	Bryan Fisher	NC DAEARDLR	E-mail: Bfisher@ncpg.gov.za
	Romaya Dorasamy	Great Karoo Renewable Energy (Pty) Ltd	E-mail: romaya@greatkaroo.energy
	Tobias Hobbach	Great Karoo Renewable Energy (Pty) Ltd	E-mail: tobias@greatkaroo.energy

Annexure 1

Format for Comments and Response Trail Report:

Date of comment, format of comment name of organisation/I&AP	Comment	Response from EAP/Applicant/Specialist
27/01/2016 Email Department of Forestry, Fisheries and the Environment: Priority Infrastructure Projects (John Soap)	Please record C&R trail report in this format Please update the contact details of the provincial environmental authority	EAP: (Noted)The C&R trail report has been updated into the desired format, see Appendix K EAP: Details of provincial authority have been updated, see page 16 of the Application form



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, Tel: +27 12 399 9000, Fax: +27 86 625 1042

Reference: Merino WEF

Enquiries: Ms. Portia Makitla

Telephone: 012 399 9411 **E-mail:** pmakitla@environment.gov.za

Ms Nicolene Venter
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PER E-MAIL

Dear Ms Venter

COMMENTS ON THE DRAFT SCOPING REPORTS FOR THE PROPOSED MERINO WIND FARM AND ASSOCIATED INFRASTRUCTURE, NORTHERN CAPE PROVINCE

The Directorate: Biodiversity Conservation has reviewed and evaluated the report.

The Directorate: Biodiversity Conservation has reviewed and evaluated the report and does not have any objections to the Draft Scoping Report & Plan of Study provided that all relevant National and Provincial biodiversity guidelines will be considered in the final report.

Please also note that any development within very highly sensitive biodiversity area; where residual impacts will result with very high significant impacts rating will not be supported. The final EIR must be submitted for review.

NB: The Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@environment.gov.za for attention of Mr. Seoka Lekota.

Yours faithfully

Mr Seoka Lekota
Control Biodiversity Officer Grade B: Biodiversity Conservation
Department of Forestry, Fisheries & the Environment
Date: 13/06/2022



Batho pele- putting people first

Savannah Environmental (Pty) Ltd

PO Box 148

Sunninghill

2157

Email: publicprocess@savannahsa.com

Date: 02 February 2022

Dear Nicolene Venter

RE: SCOPING REPORT FOR MERINO WIND FARM AND ASSOCIATED INFRASTRUCTURE, NORTHERN CAPE PROVINCE.

This letter is in response to the proposed wind energy facility and its possible impact on the Square Kilometre Array radio telescopes.

SARAO has undertaken a high-level impact assessment and based on the information provided, it was determined that the project represents a low risk of interference to the SKA radio telescope with a compliance surplus of 35.20 dBm/Hz. As such, we do not have any objection to the proposed development.

Thank you for your correspondence, our office remains open to discuss any matter relating to the above.

www.ska.ac.za

The South African Radio Astronomy Observatory (SARAO) is a National Facility managed by the National Research Foundation and incorporates all national radio astronomy telescopes and programmes. SARAO is responsible for implementing the Square Kilometre Array (SKA) in South Africa.

Regards,



Mr Selaelo Matlhane

Spectrum & Telecommunication Manager

South African Radio Astronomy Observatory (SARAO)

Tel: 011 442 2434

Email: smatlhane@ska.ac.za

Savannah Public Process

From: Fezile Oliphant <fezileoliphant75@gmail.com>
Sent: Tuesday, 07 June 2022 20:08
To: Savannah Public Process
Subject: Re:E3125: Great Karoo Cluster of Renewable Energy Facilities - EIARs review and comment period ending soon

Dear Necolene

I support the project it will bring jobs for our people

We have been disposition by lack of opportunities, this is hope for us

Can you resend my password

Best regards
Fezile Olifant
Asange and Azile General Trading PTY Ltd

Sent from my Huawei Mobile

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

Subject: E3125: Great Karoo Cluster of Renewable Energy Facilities - EIARs review and comment period ending soon
From: Savannah Environmental Public Process
To: Olifant Fezile
CC:

GREAT KAROO CLUSTER OF RENEWABLE ENERGY FACILITIES NEAR RICHMOND, NORTHERN CAPE PROVINCE

(DFFE Reference Nos.:

- **Merino WEF: 14/12/16/3/3/1/2114**
- **Kwana PV: 14/12/16/3/3/2/2118**
- **Moiri PV: 14/12/16/3/3/2/2116**
- **Nku PV: 14/12/16/3/3/1/2115**

Dear Stakeholder and Interested & Affected Party,

Our notification letter dated 13 May 2022 in which you, as registered Interested and Affected Party (I&AP), was informed that the Environmental Impact Assessment Reports (EIARs) are available for your review and comment, has reference.

This e-mail serves to inform you that the review and comment period for the EIARs is ending on **Monday, 13 June 2022**.

The EIARs are available for download from Savannah Environmental's website [click here](#)

We would like to thank those stakeholders and I&APs who submitted their written comments and urge those who had not yet done so, to please submit your written comments before or on **Monday, 13 June 2022**.

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

Kind regards,

[Unsubscribe this type of email](#)



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Nicolene Venter

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



**COMMENTS AND OBJECTIONS RELATED TO THE PROPOSED MERINO
WIND ENERGY FACILITY.**

Prepared for:
Mr. Jan Picard

Prepared by:
AVDS ENVIRONMENTAL CONSULTANTS
42 Afrikander Road,
Simon's Town,
7975

Tel/Fax: 021 786 2919
E-mail: avdspuy@iafrica.com

14 JUNE 2022

Introduction

1. These comments and objections are submitted by AVDS Environmental Consultants on behalf of the Mr. Jan Picard of Ratelfontein Private Game Reserve (RPGR).
2. RPGR directly abuts the proposed Merino Wind Energy Facility (MWEF) on its southern boundary.
3. RPGR's principle forms of business and functions are game farming, hunting and eco-tourism. RPGR generally operates in the high-end luxury ecotourism, hunting and game industry and has a number of lodges and a luxury country guesthouse, "Bloemhof". As such the hunting and tourism operations of RPGR rely fundamentally upon the areas natural and undisturbed scenery and the "sense of place" obtained from the expansive vistas which are typical of the Karoo. Any negative impact on the latter will therefore naturally have serious and un-mitigatable visual and secondary consequences for RPGR and its owner. The entire property of RPGR must be considered to be highly visually sensitive given the nature and extent of operations that range over the entire property. It is the concern of RPGR that the proposed Merino Wind Energy Facility (MWEF) and its associated renewable energy projects and electrical infrastructure will have serious negative impacts on RPGR and its operations and asset value and that such impacts will be at the very least of very high negative significance.
4. It must be noted that the concerns of the objector extend to the care and protection of the environment in general.
5. This objection reminds the EAP that the latter must ensure that "*negative impacts on the environment and on (the objector's) environmental rights be anticipated and prevented, and where they cannot be altogether prevented, are minimised and remedied*". Thus proper, correct and acceptable mitigation of the inevitable negative impacts (including those not yet identified or otherwise ignored or underplayed) must be effected, with the "no go" option considered as the ultimate mitigation measure. The "no go" option remains the objector's preferred option but should the MWEF proposal proceed, in any amended or reduced form, then it will be necessary to fairly and equally compensate (all) affected parties for and/or offset those residual negative impacts which the final approved MWEF development would undeniably have upon the objector, and the environment itself.
6. This objection must not be presumed to constitute the full range of the objector's concerns with the MWEF, and the objectors reserve their right to table any further matters that may come to their attention going forward.

Visual Impact unacceptable.

7. From the Visual Impact Assessment (VIA) that has been undertaken for the MWEF it is clearly apparent that the visual impact upon RPGR will be unacceptable despite whatever findings and justifications are given by the specialist and EAP and which parties have never bothered to ground truth their findings by conducting a visual impact assessment from the grounds of RPGR.
8. The VIA undertaken for the MWEF is an exceptionally poor study which is misleading and substantially inaccurate and it is clearly designed to favour the interests of the applicant and the MWEF's approval by understating the extent and significance of the high negative visual impacts. The fact that it mentions "Ratelfontein" but once in its entirety, despite RPGR being located directly adjacent to the MWEF, and being a visually sensitive tourism operation, and having a track record of some 8 years of public opposition to other proximate wind farms (such as Ishwati and Umsinde Emoyeni WEFs), speaks sufficiently to this point.
9. The visibility of wind turbines and electrical infrastructure from RPGR, from any distance, is unacceptable to the objector and will also be so to the clientele of RPGR. The visual sensitivity distances used in the VIA and Draft Environmental Impact Report (EIR) significantly under-state the true negative visual sensitivity and associated impacts in order to unfairly advance the interests of the applicant. Furthermore, it is noted that the visual sensitivity analysis used a grossly and intentionally misrepresented turbine height for the visual impact analysis of the MWEF turbines by using a height of only 170m (hub height) instead of the full and true height of the moving turbine at 250m (tip height) – see Figure 9.16 of the DEIR. The difference of 80m additional visual pollution is significant and will raise the already unacceptable visual impact upon RPGR even further by another. Further visual impact assessment is therefore required by an objective and honest VIA specialist and the visual impact on RPGR will need to be accurately undertaken.
10. Even although the cumulative visual impact assessment has used a significantly under-stated and misleading threshold radius of 30km from the MWEF for its assessment it nonetheless still finds that the cumulative visual impact contributed by the MWEF on the quality of the landscape will be of high negative significance and that mitigation will be of no use. This is a fatal flaw as it represents an environmentally unsustainable impact that cannot even be remedied. The transferred impact of this negative cumulative visual impact upon RPGR is ignored in the Draft EIR and VIA.

11. The EAP and VIA specialist have not properly considered the cumulative visual impact upon RPGR. The visual impact of the approved Ishwati Emoyeni WEF on RPGR, in combination with that of the MWEF is ignored. From the Ishwati Final EIR (page 2 -33) it was stated that;

“The visual impact of the Ishwati Emoyeni Wind energy Facility has however been assessed to be high (regardless of mitigation measures) for at least two farms which provide national and international tourists the opportunity to experience this characteristic of the landscape. Properties which constitute Ratelfontein Private Game Reserve and Badsfontein Country House border the Ishwati Emoyeni project area to the north and south respectively, and the Visual Impact Assessment (see Chapter 9) has determined that the viewpoints from these properties will be highly affected by the proposed wind turbines. In addition it is highly likely that the sense of remoteness which is an important tourist attraction of the region will be considerably reduced by the highly visible turbines regardless of the applied mitigation measures.”

12. The Ishwati Emoyeni WEF is the subject of an amendment (which is under appeal) but the latest VIA study undertaken for that Amendment Application has been found to be substantially applicant-biased and to understate significantly the true impact of the Amended Ishwati Emoyeni WEF. That notwithstanding, the VIA study (Section 10.2 “Constraints”) for the amendment application still specifically listed RPGR as a “constraint” to the proposed Amended Ishwati emoyeni WEF, per:

“There are two tourist related activities in the zone of visual influence, with the Ratelfontein Game Farm located adjacent to the project area. Although the lodge is located in a shallow valley on a northern aspect facing away from the wind farm, more elevated areas of the farm will be exposed to views of turbines.”

13. The Ishwati Emoyeni WEF socio-economic study offered the following relevant advice of significance:

“The visual specialist study notes that there are a number of viewpoints on the Ratelfontein Game Farm with scenic vistas that will be highly exposed wind turbines (Holland, 2014). This is a concern given that the relatively unspoilt nature of the area. It is also a particular risk, given the luxury hunting experience on offer at Ratelfontein where it is highly likely that the hunters would expect a wild and unspoilt experience. Badsfontein also sells itself on its unspoilt and quiet nature offering activities such as

walking and horse riding trails that pass in close proximity to the proposed wind turbines just north of the farm boundary.”

It is therefore quite clear that consideration of merely the lodges and guesthouse on RPGR is inaccurate and misleading and the MWEF Draft EIR fails in this regard. It is also clear that RPGR already stands to be significantly negatively visually impacted by the Ishwati Emoyeni WEF even before the MWEF adds its negative contribution and that the hunting experience will be very likely damaged. This aspect has not been considered by either MWEF VIA and Draft EIR and instead the EAP has excused doing so on the basis that the owner(s) of RPGR have apparently indicated that they are not opposed to wind turbines located north of the N! National Road. On the contrary Mr. Jan Picard has made it explicitly clear to the author that he is opposed to the views of ANY and ALL wind turbines unconditionally.

14. It is therefore quite clear that the additional visual impact posed by MWEF, alongside that of the Ishwati Emoyeni WEF and the Umsinde Emoyeni WEF, will deliver excessive and unacceptable visual impacts upon RPGR and its operations with the result that it will very likely suffer significant loss of business and may even be forced to close its doors. The MWEF will need to accept its responsibility for its part in such consequences should they be brought to bear but the current MWEF ignores such (as does the socio-economic study).
15. The night time visual impact of the MWEF (from its aviation lights) is given as High negative significance but lowered to medium by the VIA specialist if “*needs-based aircraft warning lights*” are permitted by the CAA and deemed feasible. Despite the great level of uncertainty around the implementation of the proposed mitigation measure the specialist still administers a developer-friendly lowering of the potential impact rating and the specialist even elsewhere claims to operate according to a risk averse and cautious approach – the facts show that nothing could be further from the truth! Under NEMA it is expected of a proper EIA specialist to thoroughly research¹

1. ¹ Under EIA Regulation 1(1) the following definition is stated:

“‘*Specialist*’ means a person that is generally recognised within the scientific community as having the capability of undertaking, in conformance with generally recognised scientific

relevant and important issues pertaining to the study and that may have a bearing on the study findings before giving any meaningful effect to them.

16. In summary, the VIA for the MWEF drastically understates the true visual impact that the MWEF will have on RPGR and the area and for this purpose relies extensively upon an incorrect view that Mr. Picard is not opposed to turbines north of the N1. It will be expected that a proper and comprehensive VIA be undertaken for this application and which will given proper and due consideration to the true extent and significance of visual impacts upon RPGR and the environment and that the full mitigation hierarchy will be implemented by the EAP (who has instead stopped short of considering remedy of residual negative impacts and which is a necessary measure of sustainable development).

Socio-economic impacts unacceptable.

17. When one reviews of the potential socio-economic impacts given in the Draft EIR it is noted that extensive effort has been given to exaggerating the proclaimed positive impacts and to minimizing the significance of the negative ones. It is noted that the negative ones (operational Phase) apply to RPGR directly and, in this regard, it is noted that a low negative significance impact ratings are given for impacts on visual aspects and “sense of place”; tourism; property values (all post-mitigation for operational phase). For all three of these impact categories the impact upon RPGR is diminished by the EAP claiming that the owners of RPGR are not opposed to turbines located north of the N1.
18. Despite a negative impact on tourism being recorded the impact of the MWEF on the viability of the operations of RPGR is not assessed. This is a fatal flaw omission. See Appendix A as a professional opinion of the impact of wind energy facilities and infrastructure on nature-based tourism and hunting operations. Clearly RPGR will be significantly negatively impacted by the MWEF in this regard.
19. The impact of the MWEF on the loss of employment at RPGR should its operations cease due to the negative effects of the MWEF are not assessed. This will need to be rectified in a next round of study and impact assessment.

principles, specialist studies or preparing specialist reports, including due diligence studies and socio-economic studies;” (Underlining supplied)

20. Despite a negative impact on property values being recorded in the Draft EIR (as low significance, post-mitigation, operational phase) no specific impact on the expected loss in property and enterprise value of RPGR has been undertaken and quantified in order to determine what level of mitigation and remedy (compensation) may be required in order to abide by the impact mitigation hierarchy. This will need to be determined in order to ensure that the MWEF, if built, amounts to sustainable development in which environmental justice is properly served. Appendix A records the experts' confirmation of property value loss in ventures such as RPGR.

21. The socio-economic impact assessment falls short of the required thoroughness that would enable a rational and accountable decision to be made on the application for the MWEF. We also point out that the EAP is required to undertake a proper and genuine effort to address all the concerns of the owners of properties affected by proposed developments according to the DFFE Guideline on Public Participation. This too has been ignored and our client awaits the proper consideration of his considerable fixed interests for inclusion into the final application that will be served before the decision-maker.

4 March 2022

Chairperson of Indalo Association
Mr Neale Howarth
Postnet Suite 80, Private bag 1672
Grahams town 6140
Sidbury Sports Club, N2
Eastern Cape, South Africa
E-mail: neale@pehotels.co.za

Dear Chairperson Howarth

OPINION: THE IMPACT OF ENERGY INFRASTRUCTURE ON TOURISM

While it is important to acknowledge that energy generation, and especially “clean” energy, is important to the South African economy, such initiatives should be introduced with due regard for the natural environment as well as nature and wildlife/ecotourism activities that depend on these environments. One economic activity highly dependent on the natural environment is tourism, specifically nature and wildlife tourism.

Tourism is one of the largest income generators in the world, outperforming mining and agriculture. South African Tourism reported that major international source markets from Europe and the Americas “appreciate SA for its friendly people and beautiful natural scenery”¹. Among the top-10 reasons to visit South Africa that form part of government’s tourism campaigns include:²

- Natural beauty.
- Diverse experiences.
- Wildlife.

Tourists to the Eastern Cape Province agree with this and rate scenic beauty and wildlife, including game farms and safaris, as the most valuable tourism experiences that the province offers, confirming the exceptional value of scenic resources and wildlife encounters in nature for tourism experiences.

Before COVID-19, South Africa received more than 10 million international visitors; in addition, domestic tourists are the main source of tourism for the country’s national parks, typically searching to escape daily routines and to experience undisturbed nature. South Africa is also a favourite hunting destination for the international hunting community, with the Eastern Cape as one of South Africa’s top hunting grounds for international hunters. Preserving and maintaining the natural environment, or what international authors refer to as the “wilderness”, is therefore important in areas where tourism is a major economic activity and where communities are dependent on tourism for their livelihoods. Scenic beauty is therefore an important resource with significant value to both national as well as international tourists, benefitting local and regional economies dependent on tourism.

International research on the effect of various forms of energy generation on tourism concludes that any form of visible energy infrastructure spoils the natural environment, decreasing tourism demand in the area and negatively impacting the tourism experience. The effect is especially pronounced in areas where the main attraction is unspoilt nature, as offered by national, provincial, and private parks and reserves in South Africa. Tourists are willing to pay a premium to have an unspoilt nature experience, and the decline in tourism due to a spoilt environment counteract and surpass the positive economic effects of energy development.

¹ SAT, 2019.

² SA GOV, 2018

Especially interesting is that wind turbines are viewed equally and even more undesirable than power lines. There may be various reasons for this, including the large footprint, the height and visual contrast of wind turbines and the network of roads as well as the regular rotational movement of spinning wind turbine blades which makes the turbines highly noticeable.

Impacts of energy infrastructure and specifically of wind energy infrastructure on tourism is much debated and a new field of research; however, available research indicates that the scale and extent of the impact is dependent on the tourism product offering, with nature and wildlife/ecotourism, which are more reliant on scenic resources, being most sensitive. International evidence suggests that the adverse effects of energy infrastructure on tourism are even more pronounced when:

- (i) people are familiar with the area, and
- (ii) when there are substitutes available.

With domestic tourists the primary source of visitors to national and provincial parks, changes to the natural environment will be especially apparent, instigating a change in preference and valuation of the area. In South Africa, we also boast a variety of natural areas, offering tourists the opportunity to substitute to “unspoilt wilderness” alternatives, which could exacerbate the effect of negative effects of constructing wind turbines around natural areas in South Africa. For international tourists, substitution possibilities to other “safari” destinations (Namibia, Kenya, Tanzania) are also a real possibility.

The Eastern Cape Province has established itself as a premium nature and wildlife /ecotourism destination, boasting National Parks such as Addo Elephant, Mountain Zebra, and Camdeboo National Park, provincial nature reserves and wilderness areas, including the Great Fish Provincial Nature Reserve, as well many private nature reserves and hunting lodges. The area under conservation and protection has grown significantly, mostly due to private sector investment, to reach 38,0% of all protected areas in the province.³

The proposed private sector expansion of protected areas (e.g., between the Addo Elephant Park and the Great Fish Nature Reserve, or so-call Addo to Great Fish Corridor, the Mountain Zebra-Camdeboo Corridor and others) requires not only additional investment but also guaranteed sustained income from tourism operations to be viable. Developing and constructing energy infrastructure should therefore consider the negative effects that this will have on the sustainability of the current tourism products on offer, and the developmental potential of future tourism developments for the local and regional economies.

In conclusion:

Given the international evidence, it is clear that besides the loss in property values, the loss in revenue due to a decline in tourism could prove detrimental to the local tourism businesses and economy due to inappropriate placement of energy infrastructure (resulting in land-use conflict). The closure of tourism operations and loss in investment will exacerbate the economy and community already weakened by the Covid-19 pandemic. Given that tourism is a labour-intensive industry, more accessible to the lower-skilled workers, the long-run effect of a decline in tourism activity in favour of one-off investment in the form of energy infrastructure requiring highly skilled “imported” labour, might not be in the best interest of the local community as well as wider regional and provincial economies.

The way forward:

To determine the extent of and quantify the impact would require an in-depth investigation of tourists’ valuation of the unspoilt wilderness in the area and the subsequent change in tourists’ preferences and behaviour that such energy developments will instigate. Once this is ascertained, the effect of this decline in tourism on the local economy can be modelled using standard economic modelling techniques.

The NWU TREES unit would be prepared to assist in undertaking valuation estimates, economic modelling of employment density and the development potential of future tourism developments to provide more clarity on the socio-economic impact of different development scenarios.

Yours sincerely,



Prof Andrea Saayman

and



Prof Peet van der Merwe

³ Accounts for Protected Areas, 1900 to 2020

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SCOPING PHASE



Mvelaphande Trading
P/A C Schutte
3 La Motte
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Bloemfontein
9301

Enquiries: Chris Schutte
Telephone: 078 741 5862
E-mail: Schutce5@telkom.co.za

Our Ref no: CRHC0634-21

Your Ref: Kwana Solar PV Facility

04 November 2021

SAVANNAH ENVIROMENTAL
PO Box 148
Sunninghill
2157

FOR ATTENTION: Nicolene Venter

PROPOSED DEVELOPMENT OF THE GREAT KAROO CLUSTER OF RENEWABLE ENERGY FACILITIES AND GRID CONNECTION INFRASTRUCTURE NEAR RICHMOND, NORTHERN CAPE PROVINCE

With reference to your above- mentioned application, I hereby confirm that the proposed work installation is approved in terms of Section 29 of the Electronic Communications Act No. 36 of 2005 as amended.

No infrastructure of our Client (Openserve) will be affected by this proposal. **We did our utmost to ensure that we indicate our route as accurate as possible and should you discover any of our cables that is not on the sketch please stop and contact us immediately to arrange a site meeting. In the event that our cables are exposed and damaged/stolen by a third party the damages will be repaired at the customer's account. Please make use of pilot holes in order not too damage our infrastructure.** Therefore any damages occurred during construction of work will be repaired at the customer's account.

Although we are not affected by this proposal, Mr Vivian Groenewald must be contacted at telephone number 081 362 6738 from our Network Field Services. Two (2) weeks prior to commencement of proposed work.

Approval of the proposed route is valid for six months. If construction has not yet commenced within this period, then the file must be resubmitted for approval.

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

On completion of this project, please certify that all requirements as stipulated in this letter have been met. Please note that should any of our Client (Openserve) infrastructure has to be relocated or altered as a result of your activities the cost for such alteration or relocation will be for your account in terms of section 25 of the Electronic Communication Act.

Mr Vivian Groenewald must be contacted at telephone number 081 362 6738. Two (2) weeks prior to commencement of proposed work. It's important that all services are shown on site before construction starts.

Approval of the proposed route is valid for six months. If construction has not yet commenced within this period, then the file must be resubmitted for approval. Any changes / deviations from the original planning during or prior to construction must immediately be communicated to this office.

Please notify this office and forward an as built plan, within 30 days of completion of construction.

Mr Vivian Groenewald must be contacted at telephone number 081 362 6738. Two (2) weeks prior to commencement of proposed work. It's important that all services are shown on site before construction starts.

Yours sincerely



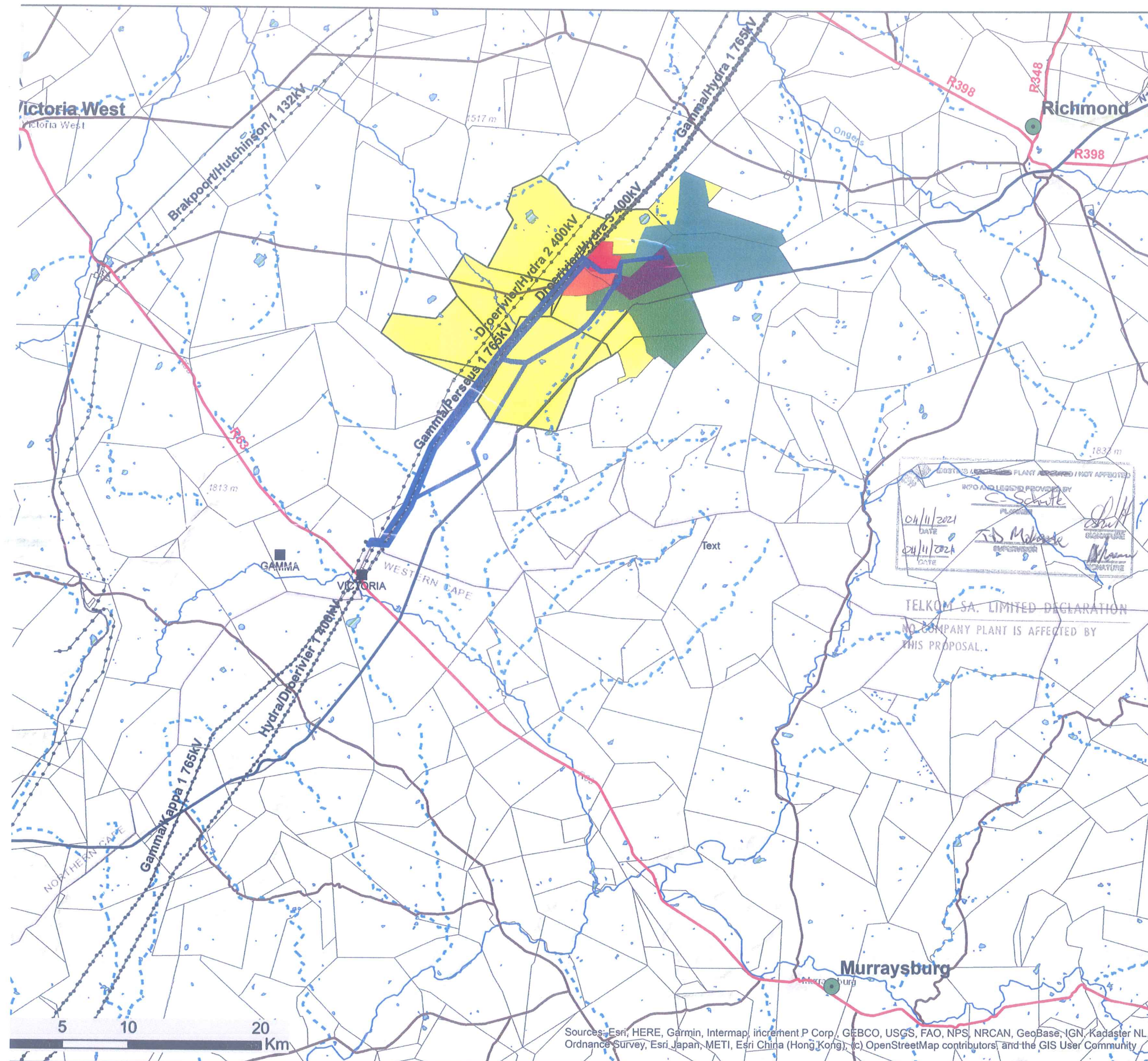
CHRIS SCHUTTE

Proposed Greater Karoo Renewable Energy Cluster, Richmond, Northern Cape Prov

Locality Map

Legend

- Towns
- Eskom Substation
- Existing Power Line
- Main Road
- National Road
- Regional Road
- - - Non-Perennial River
- Perennial River
- NFEPA Wetlands
- Great Karoo Development A
- Grid Connection Corridor 3C
- Angora Wind Energy Facility
- Merino Wind Energy Facility
- Nku Solar PV
- Moriri Solar PV
- Kwana Solar PV
- Farm Portions

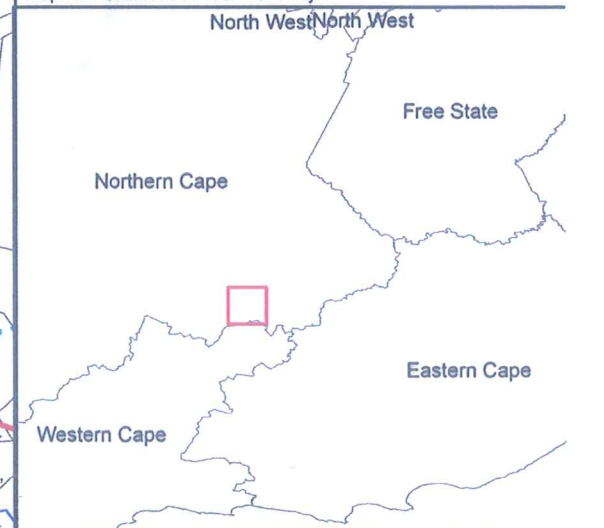


EXISTING LEGISLATION PLANT AFFECTED / NOT AFFECTED
 RPO AND LEGEND PROVIDED BY
 C. Schulte
 DATE 04/11/2021
 J.B. Malan
 DATE 04/11/2021

TELKOM SA. LIMITED DECLARATION
 NO COMPANY PLANT IS AFFECTED BY
 THIS PROPOSAL.

savanna
 environment

Scale: 1: 278 171
 Projection: WGS_1984
 Map Ref: Great Karoo REF - Locality



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

Savannah Public Process

From: Savannah Public Process
Sent: Sunday, 14 November 2021 15:07
To: 'Nick Fox Sibuya Game Reserve'
Subject: SE3125: GREAT KAROO CLUSTER OF RENEWABLE ENERGY FACILITIES: Locality Map & Website link
Attachments: Great Karoo BID Locality Map.rev3.pdf

Dear Nick,

There was a technical matter with our website and this has been resolved.

To download the Scoping Report and Appendices herewith the link <https://savannahsa.com/public-documents/energy-generation/the-great-karoo-cluster-of-renewable-energy-facilities/> and the release code is VtUvOs4x

Please find attached the locality map.

Please do not hesitate to contact me should you require any additional information.

Kind regards,



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

Nicolene Venter

Public Participation and Social
Consultant

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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From: Nick Fox Sibuya Game Reserve <nickfox@sibuya-gamereserve.co.za>
Sent: Friday, 12 November 2021 12:34
To: Savannah Public Process <publicprocess@savannahsa.com>
Subject: RE: GREAT KAROO CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of Availability of Scoping Reports

Hi

I am having a problem accessing the downloads despite code
Can you please send an area map

Kind regards,

Nick Fox

SIBUYA GAME RESERVE & LODGE (PTY) LTD
PO Box 31 Kenton-on-Sea 6191 South Africa
Tel: +27(0)46 648 2020 Fax: +27 (0)46 648 2114
Cell: 083 648 2020
nickfox@sibuya.co.za www.sibuya.co.za



From: Savannah Environmental Public Process <publicprocess@savannahsa.com>

Sent: 10 November 2021 05:01 PM

To: Nick Sibuya <nickfox@sibuya-gamereserve.co.za>

Subject: GREAT KAROO CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of Availability of Scoping Reports

**GREAT KAROO CLUSTER OF RENEWABLE ENERGY FACILITIES AND GRID CONNECTION INFRASTRUCTURE NEAR RICHMOND, NORTHERN CAPE PROVINCE
(DFFE Reference Nos.: To be Issued)**

Dear Stakeholder and Interested & Affected Party,

Great Karoo Renewable Energy (Pty) Ltd proposes the development of a cluster of renewable energy facilities and associated infrastructure, ~35km South-West of the town of Richmond along the N1 and 80km South-East of Victoria West along the R63 in the Northern Cape Province. The cluster consists of three (3) 100MW solar photovoltaic (PV) energy facilities, and two (2) 140MW wind farms.

Please find attached for your perusal the notification letter informing you of the availability of the Scoping Reports for your review and comments. The Scoping Reports are available for downloading from our website [click here](#).

Please do not hesitate to contact us should you require any additional information and/or clarification regarding these projects.

Our team welcomes your participation and look forward to your involvement throughout the Basic Assessment Process.

Kind regards,

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

Department of Forestry, Fisheries and the Environment

Directorate: Biodiversity Conservation



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, Tel: +27 12 399 9000, Fax: +27 86 625 1042

Reference: Great Karoo Cluster RE
Enquiries: Ms. Aulicia Maifo/Mrs. Portia Makitla
Telephone: 012 399 9411/9627 **E-mail:** pmakitla@environment.gov.za

Ms Nicolene Venter
Savannah Environmental
PO Box 148
SUNNINGHILL
2157

Telephone Number: +27 (11) 656 3237
Email Address: publicprocess@savannahsa.com

PER E-MAIL

Dear Ms., Venter

COMMENTS ON THE DRAFT SCOPING REPORTS FOR GREAT KAROO CLUSTER OF RENEWABLE ENERGY FACILITIES AND GRID CONNECTION INFRASTRUCTURE NEAR RICHMOND, NORTHERN CAPE PROVINCE

The Directorate: Biodiversity Conservation has reviewed and evaluated the report.

The Directorate: Biodiversity Conservation has reviewed and evaluated the report and does not have any objections to the Draft Scoping Report & Plan of Study provided that all relevant National and Provincial biodiversity guidelines will be considered in the final report.

NB: The Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@environment.gov.za for attention of Mr. Seoka Lekota.

Yours faithfully

Mr Seoka Lekota
Control Biodiversity Officer Grade B: Biodiversity Conservation
Department of Forestry, Fisheries & the Environment
Date: 10/12/2021



Batho pele- putting people first

Department of Water and Sanitation

Savannah Public Process

From: Savannah Public Process
Sent: Wednesday, 17 November 2021 09:11
To: 'Ackerman Pieter'
Cc: Nondumiso Bulunga; Tumelo Mathulwe
Subject: SE3125: GREAT KAROO CLUSTER OF RENEWABLE ENERGY FACILITIES: Response re WUL

Tracking:	Recipient	Delivery
	'Ackerman Pieter'	
	Nondumiso Bulunga	Delivered: 2021/11/17 09:11
	Tumelo Mathulwe	Delivered: 2021/11/17 09:11

Dear Pieter,

Thank you for your e-mail below.

The water use authorisation application process will be initiated once positive Environmental Authorisations (EAs) have been received and the projects are selected as Preferred Bidder under the Renewable Independent Power Producer Programme (REIPPPP) or similar programme.

Kind regards,



t: +27 (0)11 656 3237
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Nicolene Venter
Public Participation and Social
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From: Ackerman Pieter <AckermanP@dws.gov.za>
Sent: Thursday, 11 November 2021 07:35
To: Savannah Public Process <publicprocess@savannahsa.com>
Subject: RE: GREAT KAROO CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of Availability of Scoping Reports

Hi
Please apply for water use authorisation where necessary.
Attached is the Section 21 c and I water uses checklist
Regards

Pieter Ackerman (PrLArch)
Chief Landscape Architect
Department of Water and Sanitation (DWS), South Africa
Sub Directorate Instream Water Use
Tel: 012 336 8217
Cell: 082 807 3512
Fax: 012 336 6608



water & sanitation
Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

**Taking a five-minute shower a day
instead of a bath, will use a third
of the water, saving up to 400 lit
of water a week.**

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

Sent: 10 November 2021 04:59 PM

To: Ackerman Pieter <AckermanP@dws.gov.za>

Subject: GREAT KAROO CLUSTER OF RENEWABLE ENERGY FACILITIES: Notification of Availability of Scoping Reports

**GREAT KAROO CLUSTER OF RENEWABLE ENERGY FACILITIES AND GRID CONNECTION INFRASTRUCTURE
NEAR RICHMOND, NORTHERN CAPE PROVINCE
(DFFE Reference Nos.: To be Issued)**

Dear Stakeholder and Interested & Affected Party,

Great Karoo Renewable Energy (Pty) Ltd proposes the development of a cluster of renewable energy facilities and associated infrastructure, ~35km South-West of the town of Richmond along the N1 and 80km South-East of Victoria West along the R63 in the Northern Cape Province. The cluster consists of three (3) 100MW solar photovoltaic (PV) energy facilities, and two (2) 140MW wind farms.

Please find attached for your perusal the notification letter informing you of the availability of the Scoping Reports for your review and comments. The Scoping Reports are available for downloading from our website [click here](#).

Please do not hesitate to contact us should you require any additional information and/or clarification regarding these projects.

Our team welcomes your participation and look forward to your involvement throughout the Basic Assessment Process.

Kind regards,

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

Our Ref:



an agency of the
Department of Arts and Culture

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

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 17540

Date: Friday December 03, 2021
Page No: 1

Interim Comment

In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Savannah Environmental (Pty) Ltd

PO Box 148
Sunninghill
2157

Great Karoo Renewable Energy (Pty) Ltd is proposing the development of a commercial wind farm and associated infrastructure on a site located approximately 35km south-west of Richmond and 80km south-east of Victoria West, within the Ubuntu Local Municipality and the Pixley Ka Seme District Municipality in the Northern Cape Province. A preferred project site with an extent of ~29 909ha and a development area of ~5 516ha within the project site has been identified by Great Karoo Renewable Energy (Pty) Ltd as a technically suitable area for the development of the Merino Wind Farm with a contracted capacity of up to 140MW that can accommodate up to 45 turbines. The development area consists of the three (3) affected properties, which include: Portion 1 of Farm Rondavel 85 Portion 0 of Farm Rondavel 85 Portion 9 of Farm Bult & Rietfontein 96 Portion 0 of Farm Vogelstruisfontein 84 The Merino Wind Farm project site is proposed to accommodate the following infrastructure, which will enable the wind farm to supply a contracted capacity of up to 140MW: Up to 45 wind turbines with a maximum hub height of up to 170m. The tip height of the turbines will be up to 250m. Concrete turbine foundations to support the turbine hardstands. Inverters and transformers. Temporary laydown areas which will accommodate storage and assembly areas. Cabling between the turbines, to be laid underground where practical. A temporary concrete batching plant. 33/132kV onsite facility substation. Underground cabling from the onsite substation to the 132kV collector substation. Electrical and auxiliary equipment required at the collector substation that serves that wind energy facility, including switchyard/bay, control building, fences, etc. Battery Energy Storage System (BESS). Access roads and internal distribution roads. Site offices and maintenance buildings, including workshop areas for maintenance and storage. The wind farm is proposed in response to the identified objectives of the national and provincial government and local and district municipalities to develop renewable energy facilities for power generation purposes. It is the developer's intention to bid the Merino Wind Farm under the Department of Mineral Resources and Energy's (DMRE's) Renewable Energy Independent Power Producer Procurement (REIPPP) Programme, with the aim of evacuating the generated power into the national grid. This will aid in the diversification and stabilisation of the country's electricity

Proposed Merino Wind Farm which forms part of the Great Karoo Wind Energy Facility development near Richmond in the Northern Cape

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
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CaseID: 17540

Date: Friday December 03, 2021
Page No: 2

supply, in line with the objectives of the Integrated Resource Plan (IRP) with the Merino Wind Farm set to inject up to 140MW into the national grid.

Savannah Environmental (Pty) Ltd has been appointed by Great Karoo Renewable Energy (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed establishment of the Merino Wind Farm on Rondavel 85 Portion 0 of Farm Rondavel 85, Portion 9 of Farm Bult & Rietfontein 96 Portion 0 of Farm Vogelstruisfontein 84, near Richmond, Northern Cape Province.

A draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations. The proposed activities include the construction of up to 45 wind turbines with concrete foundations, invertors and transformers, temporary laydown areas, cabling between turbines to be laid underground where practical, a 33/132 kV onsite substation, switchyard, control building, fences, battery energy storage system, access roads and internal distribution roads, site office, maintenance buildings and workshop area.

CTS Heritage has been appointed to provide heritage specialist input into the EA process as per section 24(4)b(iii) of the NEMA and section 38(3) and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Lavin, J. 2021. Heritage Screener: Proposed Merino Wind Farm which forms part of the Great Karoo Wind Energy Facility development near Richmond in the Northern Cape

The proposed project footprint has not been previously subjected to heritage assessments and therefore gaps in the knowledge of the heritage in the area exist. The surrounding areas are known to contain Stone Age lithic occurrence, rock art, historical farming heritage resources and colonial history. Additionally, it is very likely that the proposed development will have a negative impact on the cultural and scenic value of the landscape. The SAHRIS PalaeoSensitivity map shows the proposed project footprint is located in an area of moderate and very high sensitivity for palaeontological resources.

Recommendations provided in the report include the following:

- Archaeological field surveys must provide sufficient ground-coverage of the areas to be developed to be able to determine the nature of the resources likely to be impacted. Palaeontological and cultural landscape field surveys will target sensitive geological and cultural landscape features.

Interim Comment

Proposed Merino Wind Farm which forms part of the Great Karoo Wind Energy Facility development near Richmond in the Northern Cape

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The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit notes the pending assessment of the impact to heritage resources and requests that the assessment comply with section 38(3) of the NHRA. The Heritage Impact Assessment (HIA) must contain an archaeological component that must be conducted by a qualified archaeologist and the report comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports.

The proposed development is located within an area of very high and moderate Palaeontological Sensitivity as per the SAHRIS PalaeoSensitivity map. As such, a field-based Palaeontological Impact Assessment (PIA) must be undertaken by a qualified palaeontologist. (See <https://www.palaeosa.org/heritage-practitioners.html> for a list of qualified palaeontologists). The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.

Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

Previous comments regarding buffers from scenic routes in the Northern Cape must be taken into consideration during the assessment on the cultural landscape or viewsapes, and the results of the Visual Impact Assessment must be incorporated into the HIA.

Further comments will be issued upon receipt of the above requested reports and the draft EIA with all appendices.

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

Yours faithfully

Natasha Higgitt
Heritage Officer

Proposed Merino Wind Farm which forms part of the Great Karoo Wind Energy Facility development near Richmond in the Northern Cape

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South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/588963>



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

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

DFFE Reference: 14/12/16/3/3/2/2114

Enquiries: Mr Herman Alberts

Telephone: (012) 399 9371 **E-mail:** HAlberts@dfffe.gov.za

Ms Jo-Anne Thomas
Savannah Environmental (Pty) Ltd
PO Box 148
SUNNINGHILL
2191

Telephone Number: 011 656 3237
Email Address: joanne@savannahsa.com

PER E-MAIL

Dear Ms Thomas

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED ESTABLISHMENT OF THE MERINO WIND FARM IN THE NORTHERN CAPE PROVINCE

The Application for Environmental Authorisation and draft Scoping Report (SR) dated November 2021 and received by the Department on 12 November 2021, refer.

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

(a) Listed Activities

- (i) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description.
- (ii) The listed activities represented in the final SR and the application form must be the same and correct.
- (iii) If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted.
- (iv) 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) Layout & Sensitivity Maps

- (i) The final SR must provide 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.
- (ii) All preferred turbine positions must be clearly numbered. The turbine position numbers must be consistently used in all maps to be included in the reports.
- (iii) The final SR must provide the technical details of the proposed facility in a table format as well as their description and/or dimensions.
- (iv) Please provide a layout map which indicates the following:
 - a) The envisioned area for the wind energy facility, i.e. placing of wind turbines and all associated infrastructure;

- b) Permanent laydown area footprint;
 - c) All supporting onsite infrastructure e.g. roads (existing and proposed);
 - d) Substation(s) and/or transformer(s) sites including their entire footprint;
 - e) Connection routes (including pylon positions) to the distribution/transmission network; and
 - f) All existing infrastructure on the site.
- (v) Please provide an environmental sensitivity map which indicates the following:
- a) The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
 - b) Buffer areas; and,
 - c) All “no-go” areas.
- (vi) The above layout map must be overlain with the sensitivity map and a cumulative map which shows neighbouring energy developments and existing grid infrastructure.

(c) 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 2 of GN R.982 of 2014 (as amended).
- (ii) Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2.

(d) Public Participation Process

- (i) Please ensure that all issues raised and comments received during the circulation of the draft SR from registered I&APs and organs of state (including this Department's Biodiversity & Conservation Section), which have jurisdiction in respect of the proposed activity are adequately addressed in the final SR.
- (ii) Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.
- (iii) The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended and as per the approved PP Plan.
- (iv) A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter.
- (v) Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as “Noted” is not regarded as an adequate response to I&APs' comments.
- (vi) The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development particularly the Western Cape Department of Western Cape Department of Environmental Affairs and Development Planning, and the District and Local Municipalities.
- (vii) Minutes and attendance registers (where applicable) of any physical/virtual meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players must be included in the final SR.

(e) Specialist Assessments

- (i) Specialist Declaration of Interest forms must be attached to the final SR. The forms are available on Department's website (please use the Department's template).
- (ii) The final EIAr and all the attached specialist studies must indicate and adequately assess a consistent number of turbines.
- (iii) The EAP must ensure that the terms of reference for all the identified specialist studies include the following:
 - a) A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisation.
 - b) Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.
 - c) Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.
 - d) Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
 - e) **All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.**
 - f) **Bird and Bat specialist studies must have support from Birdlife South Africa and SABAA.**
 - g) Should a specialist recommend specific mitigation measures, these must be clearly indicated.
- (iv) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.
- (v) Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines.
- (vi) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. **Please note that specialist assessments must be conducted in accordance with these protocols.**
- (vii) As such, the Specialist Declaration of Interest forms must also indicate the scientific organisation registration/member number and status of registration/membership for each specialist.

(f) Cumulative Assessment

- (i) If there are any other similar facilities within a 30km radius of the proposed development site, a cumulative impact assessment must be conducted for all identified and assessed impacts which must indicate the following:
 - a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.
 - b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
 - c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.

- d) A cumulative impact environmental statement on whether the proposed development must proceed.

(g) Specific comments

- (i) Please provide a clear indication of who the contact person for the Applicant is.
(ii) The approved PP plan with the approval email must be submitted with the final SR and must be included as an Appendix under the Public Participation Process.

(h) General

You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that: *“If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has 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”*

You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.

Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).

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 Forestry, Fisheries and the Environment
Letter signed by: Mr Coenrad Agenbach
Designation: Director: Priority Infrastructure Projects
Date: 06 December 2021

cc:	Debere Maphosa	Ubuntu Local Municipality	E-mail: maphosa.d@gmail.com
	Bryan Fisher	NC DAEARDLR	E-mail: Bfisher@ncpg.gov.za
	Romaya Dorasamy	Great Karoo Renewable Energy (Pty) Ltd	E-mail: romaya@greatkarro.energy
	Tobias Hobbach	Great Karoo Renewable Energy (Pty) Ltd	E-mail: tobias@greatkarro.energy

Annexure 1

Format for Comments and Response Report:

Date of comment, format of comment name of organisation/I&AP,	Comment	Response from EAP/Applicant/Specialist
27/03/2021 Email Department of Forestry, Fisheries and the Environment: National Infrastructure Projects (Joe Soap)	Please record C&R trail report in this format Please update the contact details of the provincial environmental authority	EAP: (Noted) The C&R trail report has been updated into the desired format, see Appendix K EAP: Details of provincial authority have been updated, see page 16 of the Application form

ENVIRONMENTAL IMPACT ASSESSMENTS AND PUBLIC PARTICIPATION PROCESS

PROPOSED DEVELOPMENT OF THE GREAT KAROO CLUSTER OF RENEWABLE ENERGY FACILITIES AND GRID CONNECTION INFRASTRUCTURE NEAR RICHMOND, NORTHERN CAPE PROVINCE
(DFFE Ref. No.: To be Issued)

Registration & Comment Form

October 2021

Return completed registration and comment form to: Nicolene Venter / Tumelo Mathulwe 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:	JAN PICKARD		
Organisation:	RATELFONTEIN FARMAS		
Designation:	DIRECTOR		
Postal Address:	P.O. BOX 84, RICHMOND		
Telephone:		Fax:	
Mobile:	082 569 8282		
E-mail:	info@ratelfontein.com		

I would you like to register as an interested and affected party (I&AP) on the following project's database (please tick the relevant box)

Nku Solar PV Facility		Moiriro Solar PV Facility		Kwana Solar PV Facility	
Angora Wind Energy Facility	X	Merino Wind Energy Facility	X		
Electrical Grid Infrastructure					

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 BA process for the projects 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):

BUSINESS & FINANCIAL
WE HAVE NO OBJECTION TO ANY SOLAR DEVELOPMENT, ANY WIND ENERGY FACILITY WILL GREATLY AFFECT THE FINANCIAL VIABILITY OF RATELFONTEIN FARMAS WHICH INCLUDE RATELFONTEIN HUNTING SAFARIS AND BLOEMHOF-KAROO GUEST HOUSE.

Please list your comments regarding your project selection above (add additional pages if necessary):

ANY WIND ENERGY FACILITY WILL INTERACT ON:
1) VISUAL IMPACT (VISITORS COME TO EXPERIENCE NATURE AND OPENNESS OF SPACE - 220M TURBINES WILL HAVE A DIRECT IMPACT.
2) TURBINES ARE NOT SITUATED OUTSIDE 5,2KM OF ACTIVE VERREUX GEESE NEST - WILL DESTROY MANY BIRDS
A DETAILED OBJECTION TO FOLLOW.

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:	