

APPENDIX C8
COMMENTS RECEIVED





forestry, fisheries & the environment

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

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: + 27 86 625 1042

Reference: 14/12/16/3/3/2/2161

Enquiries: Ms M Rabothata

Telephone: (012) 399 9174 **E-mail:** MRabothata@environment.gov.za

Ms. Jo-Anne Thomas
Savannah Environmental
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2157

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

PER E-MAIL

Dear Ms. Thomas

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED UMBILA EMOYENI SOLAR ENERGY FACILITY, MPUMALANGA PROVINCE

The Directorate: Biodiversity Conservation reviewed and evaluated the aforementioned Report.

Based on the information provided in the report, the following were noted:

- The majority of the project site is located within a Critical Biodiversity Area (CBA): Optimal area (41%), whilst 36% of the project site has been modified to some extent, either through cultivation, ploughing (historical and current).
- The proposed development will impact very limited areas of very high and high sensitivity. The areas that will be impacted are typically located at the edge of the boundary of these features and as such, the development will not result in the fracturing of the sensitive features. No development will be permitted within areas considered as CBAs irreplaceable as these areas play a major role in meeting biodiversity target. Therefore, the development footprint encroaching into the CBA with very high and high sensitivity must be moved away and be placed on heavily or modified disturbed areas.
- The study area contains numerous habitat variations, and include Drainage, Fallow Land, Natural Clay, Natural Dolerite, Natural Loam Soil, Natural Rock Turf, Natural Sandstone, and Disturbed areas. Therefore, Sensitive habitats of Very High" sensitivity in close proximity to the development footprint must be avoided or demarcated as No-Go area i.e. drainage lines.
- 28 freshwater resource features were identified and delineated within the 500m regulated Area. Only five wetland features will be impacted through access and underground cable route crossings. These freshwater systems are still in a fairly natural, to moderate functional condition and form ecological corridors for the movement of fauna and flora. Furthermore, they



COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED UMMBILA EMOYENI SOLAR ENERGY FACILITY, MPUMALANGA PROVINCE

provide valuable habitat for faunal Species of Conservation Concern (SCC). It is recommended that an appropriate buffer be established around medium sensitive habitats (i.e. Wetlands and Drainage lines.)

The bulk of the development is however, planned within cultivated areas and secondary grassland, these areas are irrespectively classified as "low" and "low-medium" sensitive areas. Furthermore, 15% (51.39 ha) of the proposed development footprint is planned within primary grassland that fall outside of any CBAs ("medium" sensitivity). Therefore, the development may proceed to the next stage of the EIA process provided the recommendations mentioned above and detailed in the report are adhered to.

The final report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Best Practice Guideline for Birds & Solar Energy for assessing and monitoring the impact of solar energy facilities on birds in Southern Africa.

In conclusion, please note that all Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must 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 Grade B Officer: Biodiversity Conservation
Department of Forestry, Fisheries & the Environment
Date: 14/10/2022



the sandf

Department:
Defence
REPUBLIC OF SOUTH AFRICA

C LOG/D FAC/R/401/1/3/11/3

Telephone: 012 402 2812
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Enquiries: Col Z.E. Mali

Department of Defence
Logistics Division
(Directorate Facilities)
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0001

14 October 2022

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2191

(Attention: The Directors)

LETTER OF NO OBJECTION: THE PROPOSED DEVELOPMENT OF THE UMBILA EMOYENI RENEWABLE ENERGY WIND AND SOLAR PV FACILITIES AND GRID CONNECTION INFRASTRUCTURE, MPUMALANGA PROVINCE

1. The letter dated 12 June 022 refers: The Proposed Development of the Umbila Emoyeni Renewable Energy Wind and Solar PV Facilities And Grid Connection Infrastructure, Mpumalanga Province.

2. The following procedures are applied by the DOD to evaluate the potential impact of the intended development on the DOD:

- a. Potential Impact on Landwards Activities. The potential impact of the intended development on landwards force preparation, employment and support is evaluated at the hand of the proximity of the intended development to military training areas and base areas; and possible limitations on the landwards movement and deployment of forces.
- b. Potential Impact on DOD Communication Installations. The potential impact of the intended development on DOD communication installation is evaluated by ascertaining whether the intended development intrudes into the DOD specified buffers around communication installations, as specified by the DOD Command Management and Information Services (CMIS) Division.
- c. Potential Impact on DOD Aviation Routes and Flight Safety. The potential impact of the intended development on military aviation is discussed and evaluated amongst applicable specialists from the South African Civil Aviation Authority (SACAA) and the South African Air Force (SAAF) as part of the proceedings of the Obstacle Evaluation Committee (OEC).

3. The following was concluded after conducting the various evaluations:



Lefapha la Boiphemelo . Umnyango wezokuVikela . Kgoro ya Tshireletso . iSebe lezoKhuselo . Department of Defence . Muhasho wa Tsiriledzo
UmNyango WezokuVikela . Ndzawulo ya swa Vusireheleri . Lehapha la Tshireletso . Departement van Verdediging . LI'Tiko leTekuvike


RESTRICTED



5 c 2021/11/10/22/11

- a. Potential Impact on Landwards Activities. The location of the proposed solar and wind energy facility is not in the proximity of military infrastructure and it is therefore not expected to have any impacts on the landward activities. Thus, there is no objection on the part of DOD landwards activities.
 - b. Potential Impact on DOD Communication Installations. The proposed solar and wind energy facility does not intrude into the DOD specified buffers around communication installations and communication links and therefore, there is no objection on the part of DOD communication installations.
 - c. Potential Impact on DOD Aviation Routes and Flight Safety. The proposed solar and wind energy facility is located beyond the bounds of any aviation related buffers and holds no implication for the SAAF. Thus, there is no objection on the part of DOD aviation routes and light safety.
4. The letters of no objection on the part of the DOD should not be deemed to supersede or replace any other statutory authorisation.

Yours faithfully

A handwritten signature in blue ink, appearing to be 'X.B. Ndlovu', written over a horizontal line.

(MAJOR GENERAL X.B. NDLOVU)
CHIEF LOGISTICS: LIEUTENANT GENERAL



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: 14/12/16/3/3/2/2161

Enquiries: Ms Julliet Mahlangu

Telephone: (012) 399 9320 **E-mail:** jmmahlangu@dfpe.gov.za

Ms Jo-Anne Thomas
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Cell Phone: 082 775 5628
Email Address: info@savannahsa.com

PER MAIL / E-MAIL

Dear Ms Thomas

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED UMMBILA EMOYENI SOLAR ENERGY FACILITY, MPUMALANGA PROVINCE

The Draft Environmental Impact Assessment Report (EIAr) received by the Department on 14 October 2022 and acknowledged on 18 October 2022, respectively, refer.

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

(a) Specific comments

- Recommendations provided by specialist reports must be considered and used to inform the layout.
- Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines.
- The final EIAr must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions.
- Please ensure that all softcopy maps are clear and legible
- Please ensure that the final EIAr complies with the requirements of Appendix 3 of the NEMA EIA Regulations, 2014, as amended, all conditions of the acceptance of the scoping report, and this letter.

(b) Listed Activities

- 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.environment.gov.za/documents/forms>.
- The relevant authorities with jurisdiction in respect of geographically designated areas in terms of GN R. 985 (Listing Notice 3) Activities must be continuously involved throughout the environmental impact assessment process. Written comments (or proof of consultation) 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. Please also ensure that the potential impacts on the affected geographical areas are fully assessed in the EIAr.

(c) Public Participation

- Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr. This includes but is not limited to the provincial Department of Agriculture, SANRAL, Local Municipality, the District Municipality, the Department of Water and Sanitation (DWS), the South African Heritage Resources Agency (SAHRA), the Endangered Wildlife Trust (EWT), BirdLife SA, the Department of Mineral Resources, the Department of Rural Development and Land Reform, and the Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation.
- Please ensure that all issues raised and comments received during the circulation of the draft SR and draft EIAr from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAr. 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.
- A Comments and Response trail report (C&R) must be submitted with the final EIAr. The C&R report must incorporate all comments for this development including Department's comments included in the acceptance of scoping report as well as these comments on the draft EIAr. The C&R report must be a separate document from the main report.. 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.
- Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.
- The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations, 2014, as amended.
- The EAP is requested to contact the Department to make the necessary arrangements to conduct a site inspection prior to the submission of the final EIAr.

(d) Specialist assessments

- Specialist studies must provide a detailed description of their methodology, as well as all other associated infrastructures that they have assessed and are recommending for the authorisation.
- The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.
- 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.
- Please include a table in the EIAr summarising the specialist studies required by the Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted.
- It is further brought to your attention that the 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, except where the applicant provides proof to the competent authority that the specialist assessment affected by these protocols had been commissioned before the date on which the protocols came into effect, in which case Appendix 6 of the Environmental impact Assessment

Regulations, 2014, as amended, will apply to such applications. Please indicate in the EIAr whether the protocols were applied.

- Please also ensure that the specialist studies conducted as per requirements of the protocols also include the Site Verification Report that confirms the level of sensitivity from what has been identified by the screening report.
- Please note that the Protocols require the specialists to be SACNASP registered. Proof of registration in the form of valid SACNASP certificate must be submitted for each specialist conducted.
- For the themes that have been identified as medium which requires compliance statements, please ensure that these compliance statements are attached to the EIAr and that they comply with the requirement of the protocols.

(e) Environmental Management Programme

The EMPr must also include the following:

- All recommendations and mitigation measures recorded in the EIAr and the specialist studies conducted.
- An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.
- 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.
- In addition to the above, the EMPr must comply with Appendix 4 of the EIA Regulations, 2014, as amended.

General

You are further reminded to comply with Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *“The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority -*

(a) an environmental impact assessment report inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which must have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.”

Should there be significant changes or new information that has been added to the EIAr or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 23(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: *“The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority – (b) a notification in writing that the documents contemplated in sub-regulation 1(a) will be submitted within 156 days of acceptance of the scoping report by the competent authority or where regulation 21(2) applies, within 156 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the documents, which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in sub-regulation (1)(a), and that the revised documents contemplated in sub-regulation 1(a) will be subjected to another public participation process of at least 30 days”.*

Should you fail to meet any of the timeframes stipulated in Regulation 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: Dr Danie Smit

Designation: Deputy Director: National Integrated Authorisation Projects

Date: 03/11/2022

cc:	Mr Peter Carl Venn	Emoyeni Renewable Energy Farm	Email: Peter.venn@windlab.com
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Nicolene Venter

From: Mariette Liefferink <mariette@pea.org.za>
Sent: Saturday, 08 October 2022 13:47
To: Nicolene Venter; 'Ben Brimble'; 'Braam Botha'; 'Belinda Mills'; 'Janice Finlay'; Jo-Anne Thomas
Subject: RE: Ummbila Emoyeni Renewable Energy Wind Farm Project: Invitation to Key Stakeholder Workshop

Dear Nicolene

I was unfortunately not in the position to participate.

May I kindly request, however, how the proponent proposes to dispose of the infrastructure at the end of life, that is, in terms of the “cradle to grave” principle.

Best Regards

Mariette Liefferink

CEO: FEDERATION FOR A SUSTAINABLE ENVIRONMENT

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(+27) 73 231 4893

Postnet Suite #113, Private Bag X153, Bryanston, 2021

E-MAIL: mariette@pea.org.za

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-----Original Appointment-----

From: Nicolene Venter <nicolene@savannahsa.com>

Sent: 28 September 2022 05:26 AM

To: Ben Brimble; Braam Botha; Belinda Mills; Janice Finlay; Jo-Anne Thomas

Subject: Ummbila Emoyeni Renewable Energy Wind Farm Project: Invitation to Key Stakeholder Workshop

When: 04 October 2022 02:00 PM-02:30 PM (UTC+02:00) Harare, Pretoria.

Where: Microsoft Teams Meeting

**ENVIRONMENTAL IMPACT ASSESMENTS FOR THE PROPOSED DEVELOPMENT OF THE UMMBILA EMOYENI
RENEWABLE ENERGY WIND FACILITY, MPUMALANGA PROVINCE
(DFFE Ref. No.: 4/12/16/3/3/2/2160)**

Dear Key Stakeholders,

Emoyeni Renewable Energy Farm (Pty) Ltd is proposing the development of renewable energy facilities and associated infrastructure on a site located ~6km south-east of Bethal and 1km east of Morgenzon, within the Mpumalanga Province. The project site is located across the Govan Mbeki, Lekwa, and Msukaligwa Local Municipalities within the Gert Sibande District. The larger cluster of renewable energy projects (to be known as the Ummbila Emoyeni Renewable Energy Farm) includes one 666MW wind energy facility, to be developed in several phases, and one 150MW solar energy

facility. The grid connection infrastructure for both facilities will include a 400/132kV Main Transmission Substation (MTS), to be located between the Camden and SOL Substations, which will be looped in and out of the existing Camden-Sol 400kV transmission line; on-site switching stations (132kV in capacity) at each renewable energy facility (Eskom Portion); 132kV power lines from the switching stations at each renewable energy facility to the new 400/132kV MTS; and a collector substation with 2 x 132kV bus bars and 4 x 132kV IPP feeder bays to the onsite IPP Substation.

Savannah Environmental would like to invite you to this on-line Key Stakeholder Workshop (KSW) and the purpose of the KSW is to present the following:

- brief background to the proposed projects
- an overview of the Environmental Impact Assessment Process followed;
- a summary of the key environmental findings from the Environmental Impact Assessment process; and
- an opportunity to seek clarity and raise any comments and/or concerns regarding the projects.

Should you not be able to attend the KSW, you are most welcome to inform us of to whom this invitation to your colleague/s at your Department / Company / Organisation that needs to be extended to, to attend the meeting on your behalf.

ENVIRONMENTAL IMPACT ASSESSMENT REPORT AVAILABLE FOR PUBLIC REVIEW AND COMMENT

The Environmental Impact Assessment Report (EIAR) for the Wind Energy Facility has been made available for your Municipality's review and written comments from **Thursday, 08 September 2022 to Monday, 10 October 2022**, and can be downloaded from our website: <https://savannahsa.com/public-documents/energy-generation/ummbila-emoyeni-renewable-energy-2/>.

The reports for the solar facility and grid connection infrastructure will be released for review and comment shortly.

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

Kind regards,



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Nicolene Venter
Public Participation and Social
Consultant

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

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Savannah Public Process

From: Muniappen, Anisha <Anisha.Muniappen@seritiza.com>
Sent: Tuesday, 15 November 2022 10:16
To: Savannah Public Process
Cc: Jaco Kleynhans
Subject: FW: SE3292: UMMBILA EMOYENI RENEWABLE SOLAR PV FACILITYI : EIA Report review and comment periods ending soon

Importance: High

Good day,

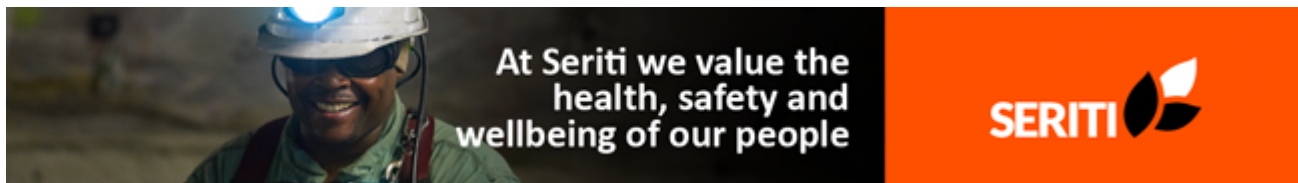
I have provided my comments to Jaco Kleynhans from Zyntha consulting last week Thursday and was under the impression it would be forwarded on to Savannah Sa. Kindly see my comments below and advise if it is received.

Kind Regards
Anisha Muniappen

Anisha Muniappen
Environmental Specialist

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15 Chaplin, Cnr Oxford and Chaplin Roads, Illovo, 2196



From: Muniappen, Anisha
Sent: Thursday, 10 November 2022 14:49
To: Jaco Kleynhans <jaco@zyntha.co.za>
Cc: Mabuza, Steven <Rekson.Mabuza@seritiza.com>; Williamson, Pieter <pieter.williamson@seritiza.com>
Subject: SE3292: UMMBILA EMOYENI RENEWABLE SOLAR PV FACILITYI : EIA Report review and comment periods ending soon - AM Comments

Good day Jaco,

I have reviewed the EIA report and have the following comments that maybe you / Steven / Savannah consulting can advise on:

- Is Savannah Consulting aware of the MR application and proposed underground mining at the Goedgedacht portion for the Remhoogte project.
- Will the Ummbila Emoyeni Renewable Solar PV Infrastructure overlap into the portions that Remhoogte surface infrastructure will be constructed in.

- The stability of the site where the proposed Remhoogte underground mining will take place. (Will this be for Seriti to determine?).

Kind Regards
Anisha

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

Sent: 08 November 2022 02:01 PM

To: Jaco Kleynhans <jaco@zyntha.co.za>

Subject: SE3292: UMMBILA EMOYENI RENEWABLE SOLAR PV FACILITY : EIA Report review and comment periods ending soon

**ENVIRONMENTAL IMPACT ASSESMENT FOR THE PROPOSED DEVELOPMENT OF THE UMMBILA EMOYENI RENEWABLE ENERGY WIND FACILITY, MPUMALANGA PROVINCE
(DFFE Reference No.: 4/12/16/3/3/2/2161)**

Dear Stakeholder and Interested & Affected Party,

Emoyeni Renewable Energy Farm (Pty) Ltd is proposing the development of a commercial Solar Energy Facility with a contracted capacity of up to 150MW and the Electrical Grid Infrastructure on a site located ~6km south-east of Bethal and 1km east of Morgenzon, within the Mpumalanga Province. The project site is located across the Govan Mbeki, Lekwa, and Msukaligwa Local Municipalities within the Gert Sibande District. The projects are planned as part of a larger cluster of renewable energy projects (to be known as the Ummbila Emoyeni Renewable Energy Farm), which include one 666MW wind energy facility, to be developed in several phases, and one 150MW solar energy facility. The grid connection infrastructure for both facilities will include a 400/132kV Main Transmission Substation (MTS), to be located between the Camden and SOL Substations, which will be looped in and out of the existing Camden-Sol 400kV transmission line; on-site switching stations (132kV in capacity) at each renewable energy facility (Eskom Portion); 132kV power lines from the switching stations at each renewable energy facility to the new 400/132kV MTS; and a collector substation with 2 x 132kV bus bars and 4 x 132kV IPP feeder bays to the onsite IPP Substation.

Our letter dated 13 October 2022 in which we notified registered Interested and Affected Parties (I&APs) that the Environmental Impact Assessment Report (EIAR) for the Solar Energy Facility is available for review and comment from **Friday, 14 October 2022 to Monday, 14 November 2022**, has reference.

We would like to take this opportunity to thank those Stakeholders and I&APs who submitted their written comments on the EIAR and we kindly urge those who have not yet submitted their written comments on the EIAR to please do so before or on **Monday, 14 November 2022**.

The EIAR can be downloaded from our website: [click here](#)

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

Kind regards,

[Unsubscribe this type of email](#)



Nicolene Venter
Public Process

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

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SOCIO-ECONOMIC IMPACT ASSESSMENT FOR THE UMMBILA SOLAR PV (150MW) FACILITY ON A

SITE NEAR BETHAL AND

MORGENZON, MPUMALANGA

PROVINCE.

1. Climate Change

The project area is within the economic region where activities are expected to take place in order to reindustrialise from fossil fuel economy. How can the project activities at the operational phase be aligned to the national Just Transition plans taking into consideration the global goal to limit future warming to 1.5 degrees Celsius.

1.5.5 Quantification of OPEX and CAPEX

Economic impact modelling will be undertaken for both the construction and operational phase of the project in order to quantify all upstream and downstream impacts to the local and national economy through the application of economic multipliers developed for the Eastern Cape Province. This will allow for impacts to be forecasted through the various sectors of the economy and provide for the magnitude of the development from a Regional Gross Domestic Product (GDP_R), Production, Job creation and tax perspective. In addition, the economic impacts of the proposed SED infrastructure spend will also be modelled. P van Jaarsveld 2022 Socio-Economic Impact Assessment EIA Report - (150MW Solar PV) September 2022 SOCIO-ECONOMIC IMPACT ASSESSMENT FOR THE UMMBILA SOLAR PV (150MW) .

How will the project activities and deliverables contribute to mitigate the effects of Climate Change in the Mpumalanga Highveld region, taking stock of the GHG concentration on the area which has an adverse effects on air quality, pollution and ecological degradation. *It requires a transition to a new economic model(Alexis Scholtz A Discussion Of Systemic Challenges For A Just Transition Towards A Low Carbon Economy).*

Are there any new industries that are likely to be created from the UMMBILA SOLAR PV (150MW) FACILITY, taking into consideration the urgent need to transition to cleaner energy technologies.. *Liberalised trade regulations have resulted in cheap imports from developing countries like China and India making it impossible for SMMEs to compete(Alexis Scholtz A Discussion Of Systemic Challenges For A Just Transition Towards A Low Carbon Economy).* It is against this statement that it is wished that SMMEs, are provided a fair space to trade fairly, openly and competitively within the project value chain processes in order to attain an inclusive economic activities that are biased towards women and the youth. *This range of benefits includes opportunities for enhanced climate competitiveness for a range of domestic industries, technology transfer and local manufacture, job creation and the development of reliable and readily available renewable energy supplies. Climate Change: Risks and Opportunities for the South African Economy Renewable Energy and the Draft IRP 2010. Alex McNamara .* A humble request is wished for the continuous engagements regarding environmental concerns on the project with focus on developing issues of Climate Change which are national and global socio-economic imperatives.

2. Just Transition

The project is a microcosm of the country Just Transition trajectory with Eskom implementing JET program which is an anchor project towards Green Economy. Eskom is decommissioning, repowering and repowering its old fleet, Bethal and Morgenzon are areas within which some of the activities are actively taking place. Are there any Social Compact anticipated between Eskom and Ummbila Emoyeni for a collaborative process on JET, in making certain that “no one is left behind” as not only South Africa but the global north has vested interest on how the country implements the new industrial revolution into clean energy. *Understood most broadly, the just transition aims to ensure that groups with limited resources – workers, their communities and small business, in particular – can take advantage of opportunities brought by the transition to a more sustainable economy. (Muhammed Patel TIPS Economist: Sustainable Growth TOWARDS A JUST TRANSITION).* *The just transition features in Cosatu’s 2011 paper entitled “A Just Transition to a low carbon and climate resilient economy. (Muhammed Patel TIPS Economist: Sustainable Growth TOWARDS A JUST TRANSITION)*

3. Governance in Environmental Management

It has been evidenced through cases that misconduct and maladministration of local community by unethical representatives hampers development and is the cause of stakeholder challenges between private sector, government and immediate or host communities. Systems of governance in stakeholder relationships must be developed in order to promote a seamless relationship amongst stakeholders. *Inclusivity in Just Transition calls for, open and transparent conduct in order to promote social cohesion to achieve sustainable development. Transformation towards a fair and equitable system of governance in South Africa is not a new fight. (Alexis Scholtz A Discussion Of Systemic Challenges For A Just Transition Towards A Low Carbon Economy)*

Nearby communities, Morgenzen in particular participation in the project for the period of operation must have a reasonable value both in quantum and quality, and contribute to the social and environmental issues experienced by the local citizens.

In terms of relative governance responsibilities, taking into consideration relevant laws and legislation, what is the relationship of the project with National government (IRP 2019, NEMA, IPPPP, etc), Provincial government and the Local government. What is the relationship between Eskom and the Lekwa Local Municipality in Mpumalanga in terms of electricity distribution agreements, Air Quality management, tariffs and debts owed to the national utility. Has the project developer made an independent assessment on the state of household and industrial establishments (farms etc) electricity connection and supply challenges for the residents of Bethal and Morgenzons. This background can provide an overview of the potential risk for tempering with infrastructure which hampers seamless project execution. Do consumers really care about the environment the source of electricity generation technologies, or tariffs.

Just Transition calls for proactive governance approach from the state actors listed, as the democratic representatives of the society. Proactive governance approach will reduce project operational risks caused through the irresponsible and unethical conduct from state actors when engaging with the project developer. The project sets out an example on how governance and conducive economic environment can attract investments and drive the country pathway to a Just Transition.

4. Sustainable Development

Is there a matrix for to quantify the project contribution to Sustainable Development goals, focusing on collaborations and inclusivity.

Are the project objectives and goals aligned to national development strategy on Sustainable Development, taking stock of the focus on reindustrialization of the country's energy hub of Mpumalanga Highveld region.

It is important that the project, in its operational lifetime develop a Social Compact for Sustainable Development, considering

Unemployment, poverty and inequality to nearby communities. Can the project sustainable development plans be aligned to UNDP Sustainable Development Goals Impact

1. Strategy
2. Management approach
3. Transparency
4. Governance

The above is important in promoting justifiable economic and social development, as a constitutional imperative, and will help to position the project on global Sustainable Development benchmarks.

МОЕПОВЕСТЬ

$$A = \pi r^2$$

SCOPING PHASE

Savannah Public Process

From: John Geeringh <GeerinJH@eskom.co.za>
Sent: Thursday, 12 May 2022 14:32
To: Savannah Public Process
Subject: RE: [CAUTION:EXTERNAL EMAIL] - SE3292: UMMBILA EMOYENI RENEWABLE ENERGY WIND & SOLAR PV FACILITIES & GRID CONNECTION INFRASTRUCTURE - EIA Process and notification of availability of Scoping Reports for review and comment
Attachments: Eskom requirements for work in or near Eskom servitudes.doc; Renewable Energy Generation Plant Setbacks to Eskom Infrastructure Rev2 - signed.pdf
Follow Up Flag: Follow up
Due By: Monday, 16 May 2022 12:00
Flag Status: Completed

Please send me a KMZ file of the affected properties. Please find attached Eskom general requirements for works at or near Eskom infrastructure, as well as the Eskom setbacks guideline for renewable energy developments.

Kind regards

John Geeringh (Pr Sci Nat) Reg. EAP (EAPASA)
Senior Consultant Environmental Management
Grid Planning: Land and Rights
Eskom Transmission Division
Megawatt Park, D1Y42, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
Tel: 011 516 7233
Cell: 083 632 7663
Fax: 086 661 4064
E-mail: john.geeringh@eskom.co.za

From: Savannah Environmental Public Process <publicprocess@savannahsa.com>
Sent: Thursday, 12 May 2022 14:13
To: John Geeringh <GeerinJH@eskom.co.za>
Subject: [CAUTION:EXTERNAL EMAIL] - SE3292: UMMBILA EMOYENI RENEWABLE ENERGY WIND & SOLAR PV FACILITIES & GRID CONNECTION INFRASTRUCTURE - EIA Process and notification of availability of Scoping Reports for review and comment

**PROPOSED DEVELOPMENT OF THE UMMBILA EMOYENI RENEWABLE ENERGY WIND AND SOLAR PV FACILITIES, AND
GRID CONNECTION INFRASTRUCTURE, MPUMALANGA PROVINCE
(DFFE Reference Nos.: To be Issued)**

Dear Stakeholder and Interested & Affected Party,

Emoyeni Renewable Energy Farm (Pty) Ltd proposes the development of a cluster of renewable energy facilities and associated infrastructure, including grid connection infrastructure and battery energy storage, ~6km southeast of Bethal and ~1km east of Morgenzon in the Mpumalanga Province. The cluster of renewable energy facilities (to be known as the Ummbilla Emoyeni Renewable Energy Farm) consists of an up to 666MW wind farm, and 150MW solar PV

facility. The grid connection infrastructure for both facilities will include a 400/132kV Main Transmission Substation (MTS), to be located between Camden and SOL Substations, which will be looped in and out of the existing Camden-Sol 400kV transmission line. The location of the MTS will be refined through an ongoing process of communication with Eskom Planning but will be within close proximity to the 400kV line in order to cut into this line. The size of the MTS will likely be 600m x 600m as per Eskom requirements.

Each renewable energy facility will be constructed as a separate stand-alone project and therefore, separate Scoping and Environmental Impact Assessment (S&EIA) processes will be undertaken for each of the renewable energy facilities. Similarly, the grid connection solution will be subjected to a separate EIA process. Due to the proximity of the renewable energy facilities and their associated grid connection solution to one another, the public participation processes for the projects will be undertaken concurrently, providing the public with an opportunity to understand and provide comment on all the projects.

Attached for your perusal is the Background Information Document that provides technical details regarding the proposed renewable energy facilities and grid connection and a Registration & Comment Form.

The attached letter serves to:

- inform you that the Scoping Reports drafted for each of the above cluster of wind farms and solar PV applications are available for your review and comment from **Thursday, 12 May 2022** until **Monday, 13 June 2022**. The Scoping Reports can be downloaded from our website: [click here](#); and
- invite you to attend the on-line public participation process meeting taking place on Tuesday, 31 May 2022 at 17h00.

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

Kind regards,

[Unsubscribe this type of email](#)



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Nicolene Venter
Public Process

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c: +27 (0) 60 978 8396

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

NB: This Email and its contents are subject to the Eskom Holdings SOC Ltd EMAIL LEGAL NOTICE which can be viewed at [http://www.eskom.co.za/Pages/Email Legal Spam Disclaimer.aspx](http://www.eskom.co.za/Pages/Email_Legal_Spam_Disclaimer.aspx)

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.
P O Box 1091, Johannesburg, 2000.
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	<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**



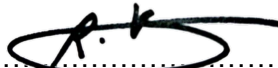
Documentation Type: **Guideline**

Revision: **2**

Total Pages: **9**

Next Review Date: **N/A**

Disclosure Classification: **CONTROLLED DISCLOSURE**

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

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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.

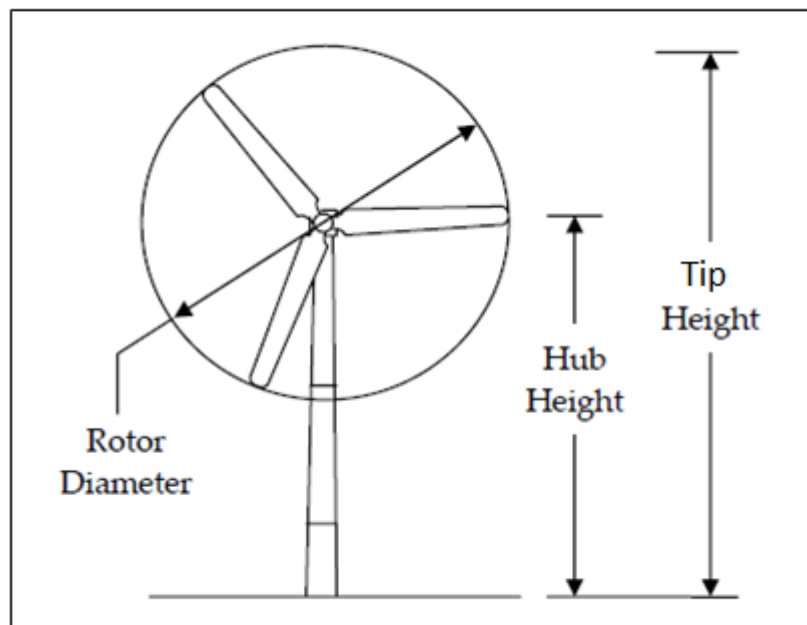


Figure 1: Horizontal Axis Wind Turbine [2]

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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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	<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**




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<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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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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When downloaded from the EDMS, this document is uncontrolled and the responsibility rests with the user to ensure it is in line with the authorised version on the system.

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.

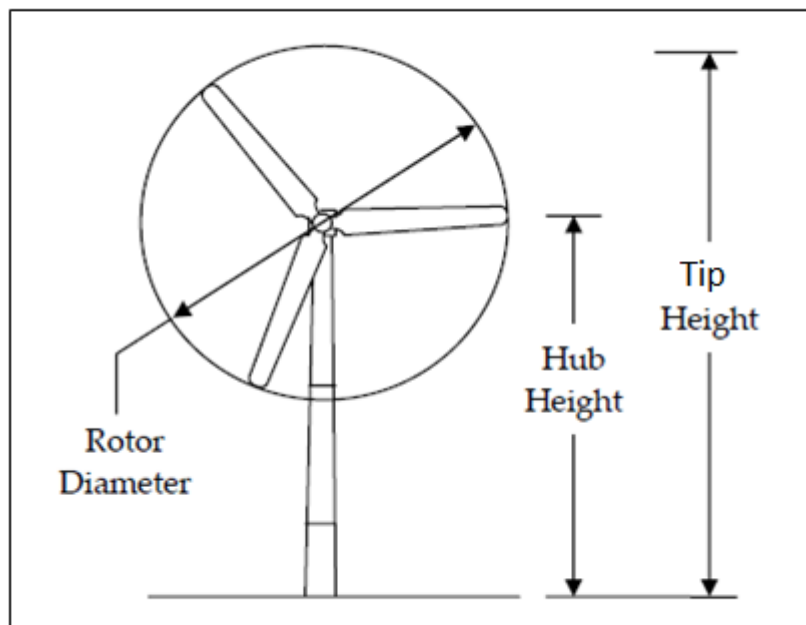


Figure 1: Horizontal Axis Wind Turbine [2]

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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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forestry, fisheries & the environment

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DFFE Reference: 14/12/16/3/3/2/2160

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PER MAIL / E-MAIL

Dear Ms Thomas

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED UMMBILA EMOYENI WIND ENERGY FACILITY, MPUMALANGA PROVINCE

The Application for Environmental Authorisation and Draft Scoping Report (SR) dated May 2022 and received by the Department on 13 May 2022, refer.

This letter serves to inform you that the following information must be included to the Final Scoping Report:

(a) Layout & Sensitivity Maps

Please provide a layout map which indicates the following:

- location of the proposed wind energy facility including associated infrastructure.
- The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
- Buffer areas; and
- All “no-go” areas.
- The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure.
- Google maps will not be accepted.

(b) Public Participation Process

- Please ensure that all issues raised and comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction (including this Department’s Biodiversity Section) in respect of the proposed activity are adequately addressed in the Final SR. 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. The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.
- 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. 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.

- 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 South African Astronomical Observatory, the Mpumalanga Environmental Department, the District and Local Municipalities.

(c) Specialist Assessments

- Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of turbine positions, and all other associated infrastructures that they have assessed and are recommending for authorisations.
- The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.
- 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.
- 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.**

(d) Cumulative Assessment

- Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:
 - 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.
 - 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.
 - The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
 - A cumulative impact environmental statement on whether the proposed development must proceed.

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



Milicent Solomons
Acting Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Letter signed by: Dr Danie Smit
Designation: Deputy Director: National Infrastructure Projects
Date: 08/06/2022

cc:	Mr Peter Carl Venn	Emoyeni Renewable Energy Farm	Email: Peter.venn@windlab.com
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Our Ref:



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Department of Arts and Culture

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Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 18576

Date: Friday June 10, 2022
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

Emoyeni Renewable Energy Farm (Pty) Ltd is proposing the development of renewable energy facilities, collectively known as the Umbbilla Emoyeni Renewable Energy Facility, consisting of a commercial wind farm, solar PV facility, and associated grid infrastructure, including a battery energy storage system, located approximately 6km southeast of Bethal in the Mpumalanga Province of South Africa. A preferred project focus area with an extent of 27 819ha been identified by Emoyeni Renewable Energy Farm (Pty) Ltd as a technically suitable area for the development of the Umbbilla Emoyeni Renewable Energy Farm with a contracted capacity of up to 666MW of wind energy and 150MW of solar energy. This layout, and project capacity, will reduce as the EIA and scoping process identifies environmental constraints that exclude areas for development. The wind farm is proposed to accommodate the following infrastructure: Up to 111 wind turbines with a maximum hub height of up to 200m. The tip height of the turbines will be up to 300m. 33kV / 132kV onsite collector substations Battery Energy Storage System (BESS) Cabling between turbines, to be laid underground where practical Laydown and O&M hub (approximately 300m x 300m): Batching plant of 4ha to 7ha Construction compound (temporary) of 6 Ha approximately Operation and Maintenance office of 1.5Ha approximately , Laydown and crane hardstand areas (approximately 75m x 120m) Access roads of 12-13m wide, with 12m at turning circles. It is anticipated that the power generated by the project will be bid into the REIPPPP tender process (DMRE) and/or into private off take opportunities. The LILO corridor will intersect with either the Camden-Zeus 1 400kV, Camden-Zeus 2 400kV or Camden-Tutuka 400kV power line.

Savannah Environmental (Pty) Ltd has been appointed by Emoyeni Renewable Energy Farm (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Umbbilla Emoyeni Wind Energy Facility, near Bethal, Mpumalanga Province.

A draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed

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development will include the construction of 111 turbines over an area of 27 819 ha with associated infrastructure such as underground cabling, on-site collector substation, 3 x 132kV powerlines from the substation, site office, batching plant, 3 x operation and maintenance office, 3 x laydown areas, laydown and crane hardstands and access roads.

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

Lavin, J. 2022. Desktop Heritage Screening Assessment for the Umbila Emoyeni Renewable Energy Wind and Solar PV Facilities, Mpumalanga Province.

The desktop study noted that heritage resources such as Stone Age resources, Late Iron Age sites, burial grounds and graves, historical werfs and Anglo-Boer war remains may be located within the proposed development area. The proposed development footprint is located in areas of moderate and very high palaeontological sensitivity, underlain by the Vryheid formation.

The report recommends that further field assessment of the impact to heritage including palaeontological resources must be undertaken.

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit notes the pending assessment of the impact to heritage resources. The HIA must comply with section 38(3) of the NHRA as required by section 38(8) of the NHRA. The HIA must include an archaeological and palaeontological component.

The archaeological component of the HIA must be conducted by a qualified archaeologist and must comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports.

The proposed development footprint is located in areas of moderate and very high sensitivity as per the SAHRIS PalaeoSensitivity Map. Therefore, a field-based Palaeontological Impact Assessment must be undertaken by a qualified palaeontologist. 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

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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.

Further comments will be issued upon receipt of the draft EIA documents inclusive of appendices and the above pending heritage specialist reports.

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

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/597541>