

APPENDIX C8
COMMENTS & RESPONSES REPORT



**PROPOSED DEVELOPMENT OF THE VREDE SOLAR PHOTOVOLTAIC, PIXLEY KA SEME DISTRICT MUNICIPALITY, NORTHERN CAPE PROVINCE
(DFFE Ref. No.: To be Issued)**

COMMENTS AND RESPONSES REPORT

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The Scoping phase of the Environmental Impact Assessment (EIA) Process for the Vrede Solar Photovoltaic (PV) project located near Phillipstown and Petrusville, Northern Cape Province was announced on Thursday, 30 June 2022. The Background Information Document, which included the information on the cluster of 21 solar PV facilities, was distributed together with a notification letter which served to invite Interested and Affected Parties (I&APs) to register their interest in the project and to submit any comments / queries that they might have on any of the proposed developments. All written comments received during the Scoping Phase of the EIA process to date have been included in the table below and in **Appendix C6** of the Scoping Report.

The Scoping Report is available for a 30-day review and comment period from **Friday, 13 January 2023** until **Monday, 13 February 2023**. The Comments and Responses Report (C&RR) will be updated with comments received during the review and comment period and included in **Appendix C6** of the final Scoping Report.

The C&RR is included as a separate document to the Scoping Report as **Appendix C8**.

NOTE:

All comments captured in the C&RR are verbatim and have not been summarised.

NOTE:

In terms of Regulation 44(1) of the EIA Regulations 2014, as amended, please note that the comments raised, and responses provided at the various virtual Meetings held during the 30-day review period of the Scoping Report will be attached as **Appendix C7** of the final Scoping Report.

LIST OF ABBREVIATIONS / ACRONYMS

EIA	Environmental Impact Assessment	S&EIA	Scoping and Environmental Impact Assessment
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1. COMMENTS RECEIVED DURING THE COMMENCEMENT OF THE SCOPING PHASE OF THE EIA PROCESS

1.1. Organs of State

No.	Comment	Raised by	Response
1.	1. The biggest concern is that the project falls in an Important Bird Areas and proper avifauna surveys must be conducted in order to mitigate the impacts on birds, as there is already a lot of power lines in the area.	N Uys and E Swart Scientific Manager GR B: Environmental Research & Development Letter: 07 July 2022	An Avifaunal Impact Assessment will be undertaken by a suitably qualified Avifaunal Specialist. The Assessment will identify impacts associated with the proposed development and relevant mitigation measures will be formulated. Furthermore, Birdlife SA will be contacted to provide recommendations as per the latest protocols.
	2. Please incorporate into the assessment the Eskom maintenance roads under power line(s) for maintenance and fire breaks (there is specific sizes for specific line sizes).		The Eskom requirements will be assessed and if required will be included in the Generic EMPs in the EIA Phase of the process.
	3. Please note the area is also an arid landscape and temporary roads leave scars in the landscape for years.		Noted. Where possible existing roads will be used for temporary road access.
	4. Please include under cumulative impacts assessed other developments such as agriculture and mining. Also include in the assessment the other renewable energy projects in the area and their associated power lines, especially the Kudu Solar PV and EGI that is located adjacent to this development.		An in-depth assessment of other developments within the areas will be conducted during the EIA Phase of the S&EIA Phase.
	5. This is a massive project and the cumulative impact of the project size should also be assessed.		The potential cumulative impacts of the proposed project have been included in Section 9.5 of the Draft Scoping Report. An in-depth assessment will be further conducted during the EIA Phase of the S&EIA Process.
	6. It is recommended that all Environmental Authorisations for Renewable Energy (RE) projects as well as power lines must be re-evaluated if there are any changes in the way RE projects are approved for the De Aar area.		During the S&EIA Phase, the DFFE link for renewable projects database: https://egis.environment.gov.za will be utilised to assess Renewable Energy Projects in the area to assess the cumulative impacts of the proposed development.
	7. Fauna and flora permits will be needed for removal of flora and fauna for both the power line(s) and the renewable energy facilities.		Any required permits will be obtained from relevant authorities prior to any commencement of construction activities.

No.	Comment	Raised by	Response
2.	<p>With reference to your above-mentioned application, I hereby inform you that our Client (OPENSERVE) approves the proposed work indicated on your drawings in terms Section 29 of the Electronic Communications Act 36 of 2005 as amended.</p> <p>Any changes/deviations from the original planning during or prior to construction must immediately be communicated to this office.</p> <p>Our Client (OPENSERVE)'s infrastructure is affected by this proposal and the routes are marked in PINK on attached sketch as accurately as possible. We did our utmost to ensure that we indicate our route as accurate as possible and should you discover any of our cables that are not on the sketch please stop and contact us immediately to arrange a site meeting. Please make use of pilot holes in order not to damage our infrastructure. Therefore, any damages occurred during construction of work will be repaired at the customer's account. Consequently, the following conditions apply:</p> <p>Aerial Plant - At points of crossing, the overhead power lines should cross above the communications lines in accordance with and clearances stipulated in the Occupational Health and safety Act no 85 of 1993, Machinery regulations 20 – Crossings, and Electrical Machinery Regulations 15 – Clearance of Power Lines. If the specifications could not be met, all deviation costs will be for the applicant's account. We also refer to section 25 of Electronic Communication Act 36 of 2005.</p> <p>Sketch included in <u>Appendix C6: Comments Received of the Scoping Report</u></p>	<p>Mantwa Gabaitumele Mvelaphande Trading (OpenServe Service Provider)</p> <p>Letter: 14 July 2022 Ref.: CPLT0414-22</p>	<p>The approval is noted. No further response is required.</p> <p>Noted. The details as contained in the correspondence have been provided to the Applicant for further action, as may be required.</p>

No.	Comment	Raised by	Response
	<p>At points of crossing, the overhead power line should cross over the overhead communication lines with a minimum vertical separation of 0.8 meters.</p> <p>Suitable protection as laid down in section 5 of the Code of Practice should be provided at all important crossings.</p> <p>The crossing of supply lines or overhead service mains directly above or adjacent to communication poles must be avoided if possible. If not clearance of 3 meters must be provided.</p> <p>In order to minimize noise induction into the telecommunication systems, the angle of crossing between the overhead power line and all communication lines, should be as near to a right angle as possible – the following deviation from the right angle being permitted at:</p> <ul style="list-style-type: none"> • Power voltage of 48 kV and higher - 30 degrees • Power voltage of lower than 48 kV - 45 degrees <p>SWER must be as near as 90 degrees as possible</p> <p>Approved on condition that, should it later be found necessary to deviate the existing communication line due to existing noise interference or any other reason whatsoever, the cost of such remedial action shall be repayable.</p> <p>Paragraph 2.4.1 of the Code of Practice stipulates the minimum acceptable horizontal separation between power and the communication lines and where this cannot be met, the design of the power line is also stipulated. This could apply between the attached plans and these requirements should strictly be adhered to.</p> <p>In cases where an underground power cable will run parallel with an existing underground communication cable, a separation as great as possible should be maintained with a minimum separation of 600mm. should the separation be less than 600mm and the power cable are not enclosed in a suitable pipe, a concrete slab must be provided immediately</p>		

No.	Comment	Raised by	Response
	<p>above the power cable for the length of parallelism. If the separation is less than 300mm, additional protection is required by placing concrete slabs between our Client (OPENSERVE) cables/pipes and the power cables.</p>		
	<p>Underground Crossings - At the points where our Client (OPENSERVE)'s existing underground communication cable will be crossed by an underground cable; the latter should be laid a depth of at least 300mm below the communication cable – normally laid at a depth of 600mm. If the power cable is not enclosed in a suitable pipe, protection in the form of a concrete slab should be provided immediately above the power cable for a minimum of 2 (Two) metres on either side of crossing.</p>		
	<p>Calculations have shown that an earth fault on the high voltage Power lines will induce excessive low frequency induction into the Communication lines. As a result of this, the cost to deviate / alter the communication lines to prevent this induction will be for the power provider.</p>		
	<p>Relocations of our Client (OPENSERVE) plant will be done at customer's request and will be a repayable project.</p>		
	<p>Please notify the office within 21 working days from date of this letter of acceptance and if any alternative proposal is available of if a recoverable work should commence, the liaison officer is Mantwa Gabaitumele at tel. no. 0825216813.</p>		
	<p>As important cables are affected, Mr Vivian Groenewald must be contacted at 054 338 6501 /081 362 6738, (2) two weeks' prior of commencement on construction work. It would be appreciated if this office can be notified within 30 days on completion of construction work. Confirmation is required on completion of construction as per agreed requirements.</p>		
	<p>On completion of this project please certify that all requirements as stipulated in this letter have been met. Please</p>		

No.	Comment	Raised by	Response
	<p>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 alterations or relocations will be for your account in terms of section 25 of the Electronic Communications Act.</p> <p>This approval is valid for 6 months only, after which re-application must be made if the work has not been completed.</p> <p>Should our Client (OPENSERVE) infrastructure be damaged while work is undertaken, kindly call the Toll-free number 0800203951 immediately.</p> <p>All of our Client (OPENSERVE) rights remain reserved.</p> <p>Mr Vivian Groenewald must be contacted at 054 338 6501 /081 362 6738, Two weeks before any commencement of proposed work.</p>		

1.2. Key Stakeholders and Interested & Affected Parties

No.	Comment	Raised by	Response
1.	The Haumann Family Trust is in favour of the relevant developments proposed.	Eduard Haumann Landowner Reg&Comm Form: 01 July 2022	The positive comment submitted is acknowledged.
2.	Ek besit eiendom naasliggend in die ge-afekteerde areas van Fase 1, 2 & 3. Translation: I own properties adjacent to the affected area of Phase 1, 2 & 3.	Kobus de Villiers Landowner Reg&Comm Form: 23 July 2022	The location of the landowner's property is acknowledged, and the property details were requested to determine the locality of his property in relation to the proposed developments.

<p>3.</p>	<p>We are aware of proposed Hydra B Cluster of Renewable Energy Facilities near Philipstown in the Northern Cape (21 Solar PV Facilities).</p> <p>The Environmental Management Services (EMS) group of the CSIR is also undertaking Environmental Assessment processes for the proposed Kudu Solar Facility cluster in the vicinity. Here is a link to the Background Information Document for additional information:</p> <p>Would it be possible to please register myself and Helen Antonopoulos on the project database of I&APs?</p> <p>Please see our email addresses below:</p> <ul style="list-style-type: none"> - Rohaida Abed – RAbed@csir.co.za - Helen Antonopoulos - <p>Our preferred method of notification is email.</p> <p>Our interest in the application is as stated above (i.e. Environmental Assessment Practitioner for a nearby Solar PV development).</p> <p>Would it be possible to please send us a KMZ file of the affected properties of the proposed Hydra B Cluster of Renewable Energy Facilities? Please also kindly let us know what the status of the project is.</p> <p>We have noted your request to register on the Kudu Solar PV project also and will also respond on that separately.</p>	<p>Rohaida Abed Senior Environmental Assessment Practitioner CSIR</p> <p>E-mail: 02 September 2022 @ 09h21</p>	<p>Please receive herewith confirmation that you and Ms Helen Antonopoulos have been registered on the above projects database.</p> <p>Savannah Environmental's registration on the Kudu Solar Facility cluster is acknowledged.</p> <p>A Request was lodged for the .kmz file for the Kudu Solar Facility.</p>
	<p>I hope that you are well. Thank you for registering us on the database for the proposed Hydra B Cluster of Renewable Energy Facilities.</p>	<p>Rohaida Abed Senior Environmental Assessment Practitioner</p>	<p>At the time of the request the KMZ file had not yet been finalized. The affected properties of the proposed project have been included in the draft scoping report. The draft</p>

	<p>Would it be possible to please send us a KMZ file of the affected properties of the proposed Hydra B Cluster of Renewable Energy Facilities? Please also kindly let us know what the status of the project is.</p> <p>We have responded on your request to register on the Kudu Solar PV project also.</p>	<p>CSIR E-mail: 04 September 2022 @ 10h37</p>	<p>scoping report will be made available to all registered interested and affected parties for a 30-day review period from the 13th of January 2023 to the 13th of February 2023.</p>
	<p>I hope that you are well. Apologies for the follow up, we just kindly enquiring on the KMZ file and status of the proposed Hydra B Cluster of Renewable Energy Facilities, and if you have any information on the proposed Hydra B substation (such as proposed location etc.).</p> <p>We look forward to your feedback.</p>	<p>Rohaida Abed Senior Environmental Assessment Practitioner CSIR E-mail: 07 September 2022 @ 17h39</p>	<p>The .kmz file has not yet been finalised and will be forwarded to the I&AP once received from the Applicant.</p>
	<p>I hope that you are well. I am kindly following up on the KMZ for the Hydra B Cluster of RE Facilities please.</p> <p>Please could you kindly share it with us?</p>	<p>Rohaida Abed Senior Environmental Assessment Practitioner CSIR E-mail: 20 October 2022</p>	