

DRAFT SCOPING REPORT

PROPOSED MAKOANENG SOLAR POWER PLANT NEAR BLOEMFONTEIN, FREE STATE PROVINCE

11 August 2023



PROJECT DETAIL

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GLOSSARY OF TERMS AND ACRONYMS

BA	Basic Assessment
BAR	Basic Assessment Report
CEA	Cumulative Effects Assessment
DFFE	Department of Forestry, Fisheries and the Environment
DM	District Municipality
DMRE	Department of Mineral Resources and Energy
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
EP	Equator Principles
EPFI	Equator Principles Financial Institutions
Environmental	Any change to the environment, whether adverse or beneficial, wholly
impact	or partially resulting from an organization's environmental aspects.
GNR	Government Notice Regulation
HGM	Hydrogeomorphic Unit
I&AP	Interested and affected party
IDP	Integrated Development Plan
IFC	International Finance Corporation
IPP	Independent Power Producer
kV	Kilo Volt
LM	Local Municipality
Mitigate	Activities designed to compensate for unavoidable environmental damage.
MW	Megawatt
NEMA	National Environmental Management Act No. 107 of 1998
NERSA	National Energy Regulator of South Africa
NWA	National Water Act No. 36 of 1998
ΡΑΟΙ	Project Area of Influence
РРР	Public Participation Process
PV	Photovoltaic
REIPPPP	Renewable Energy Independent Power Producer Procurement Process



SAHRA	South African Heritage Resources Agency
SDF	Spatial Development Framework
SPP	Solar Power Plant
VU	Vegetation Unit



CONTEXT FOR THE DEVELOPMENT

According to Eskom, the demand for electricity in South Africa has been growing at approximately 3% per annum. This growing demand, fueled by increasing economic growth and social development, is placing increasing pressure on South Africa's existing power generation capacity. Coupled with this, is the growing awareness of environmentally responsible development, the impacts of climate change and the need for sustainable development. The use of renewable energy technologies, as one of a mix of technologies needed to meet future energy consumption requirements is being investigated as part of the national Department of Mineral Resources and Energy's (DMRE) (previously referred to as the Department of Energy) long-term strategic planning and research process.

The primary rationale for the proposed solar photovoltaic (PV) facility is to add new generation capacity from renewable energy to the national electricity mix and to aid in achieving the goal of 42% share of all new installed generating capacity being derived from renewable energy forms, as targeted by DMRE (Integrated Resource Plan Update 2010-2030). The IRP also identifies the preferred generation technologies required to meet the expected demand growth up to 2030 and incorporates government objectives including affordable electricity, reduced greenhouse gas (GHG) emissions, reduced water consumption, diversified electricity generation sources and localisation and regional development. In terms of the Integrated Resource Plan Update (2019 IRP Update, 2010-2030), over the short term (of the next two or three years), clear guidelines arose; namely to continue with the current renewable bid programme with additional annual rounds of 1000 MW PV, with approximately 8.4GW of the renewable energy capacity planned to be installed from PV technologies over the next twenty years.

The proposed project is intended to form part of the Department of Mineral Resources and Energy's (DMREs) Renewable Energy Independent Power Producer Procurement (REIPPP) Programme or any other programmes/opportunities to generate power in South Africa. The REIPPP Programme aims to secure 14 725 Megawatts (MW) of new generation capacity from renewable energy sources, while simultaneously diversifying South Africa's electricity mix. According to the 2021 State of the Nation Address, Government will soon be initiating the procurement of an additional 11 800 MW of power from renewable energy, natural gas, battery storage and coal in line with the Integrated Resource Plan 2019 and fulfilling their commitments under the United Nations Framework Convention on Climate Change and its Paris Agreement which include the reduction of greenhouse gas emissions. Eskom, our largest greenhouse gas emitter, has committed in principle to net zero emission by 2050 and to increase its renewable capacity.

In response to the above, Makoaneng Solar Power Plant (RF) (Pty) Ltd is proposing the development of a photovoltaic solar facility and associated infrastructure for the purpose of commercial electricity generation on an identified site located on the farm Nakob No. 750, Brandfort RD, Portion 1 of the farm Avondzon 278, Brandfort RD, Reminder farm Selborne 392, Thaba 'Nchu RD, The farm Buxton 581, Thaba 'Nchu RD and the farm Goedehoop 251, Thaba 'Nchu RD, Free State Province situated within the Masilonyana Local Municipality area of jurisdiction (refer to Figure A for the locality map). The project entails the generation of up to 550 MW electrical power through photovoltaic (PV) technology. The total development footprint of the project will approximately be 844 hectares (including supporting infrastructure on site and including the overhead power line). From a regional site selection perspective, this region is



preferred for solar energy development due to its global horizontal irradiation value of around 2134 kwh/m².



EXECUTIVE SUMMARY

Like many other small and developing municipalities in the country, the Masilonyana Local Municipality faces a number of challenges in addressing the needs of sustainable growth and improved quality of life (SDF, 2021). The Masilonyana Local Municipality Spatial Development Framework (2020/2021- 2024/2025) identifies specific threats and weaknesses experienced in the municipal area which includes lack of proper infrastructure, poor maintenance of infrastructure, lack of financial governance, lack of employment opportunities, lack of bulk services, uncontrolled development and lack of skills development, to name a few.

The Masilonyana Local Municipality's Integrated Development Plan (IDP, 2022-23) identifies the goals of the municipality as improved efficiency and effectiveness of the municipal administration, improved provision of basic and environmental services in a sustainable way to our communities, increased economic growth, improve community confidence in the system of local government and enhanced financial viability and improved financial management. The IDP considers the economic structure and performance and how the municipality relies heavily on the agricultural sector and the general decline of the sector. It indicates that alternative sectors to the declining sectors of the area needs to be explored, which includes the renewable energy sector.

Makoaneng Solar Power Plant (RF) (Pty) Ltd intends to develop a 550MW photovoltaic solar facility and associated infrastructure on the farm Nakob No. 750, Brandfort RD, Portion 1 of the farm Avondzon 278, Brandfort RD, Reminder farm Selborne 392, Thaba 'Nchu RD, the farm Buxton 581, Thaba 'Nchu RD and the farm Goedehoop 251, Thaba 'Nchu RD, Free State Province situated within the Masilonyana Local Municipality and Lejweleputswa District Municipality area of jurisdiction. The city of Bloemfontein is located approximately 40 km southwest of the proposed development (refer to Figure A and B for the locality and regional map). The total development footprint of the project will approximately be 844 hectares (including supporting infrastructure on site). The total EIA footprint under assessment is 1260 hectares. The site was identified as being highly desirable due to its suitable climatic conditions, topography (i.e., in terms of slope), environmental conditions (i.e., agricultural potential, ecological sensitivity and archaeology), proximity to a grid connection point (i.e. for the purpose of electricity evacuation), as well as site access via a main road (i.e. to facilitate the movement of machinery, equipment, infrastructure and people during the construction phase).

In terms of the National Environmental Management Act (Act 107 of 1998), with specific reference to Sections 24 and 24D, as read with GNR 324-327, as amended (2017), Environmental Authorisation is required for the Makoaneng Solar Power Plant. The following listed activities have been identified with special reference to the proposed development and are listed in the EIA Regulations (as amended):

- <u>Activity 11(i) (GN.R. 327):</u> "The development of facilities or infrastructure for the transmission and distribution of electricity outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts."
- <u>Activity 12(ii)(a)(c) (GN.R. 327):</u> "The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (c) within 32 meters of a watercourse measured from the edge of a watercourse."



- <u>Activity 14 (GNR 327)</u>: "The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres."
- <u>Activity 24 (ii) (GN.R 327):</u> "The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters."
- <u>Activity 28(ii) (GN.R. 327):</u> "Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare."
- <u>Activity 56 (ii) (GN.R 327): "</u>The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre (ii) where no reserve exists, where the existing road is wider than 8 metres..."
- <u>Activity 1 (GN.R. 325):</u> "The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more..."
- <u>Activity 15 (GN.R. 325):</u> "The clearance of an area of 20 hectares or more of indigenous vegetation..."
- <u>Activity 10 (b)(i)(hh) (GN.R 324):</u> "The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (b) in the Free State, (i) outside urban areas (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."
- <u>Activity 12 (b)(vi) (GN.R 324):</u> "The clearance of an area of 300 square metres or more of indigenous vegetation (b) in the Free State, (vi) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."
- <u>Activity 14(ii)(c)(b)(i)(ff) (GN.R 324):</u> "The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more, where such development occurs (c) within 32 metres of a watercourse, measured from the edge of a watercourse, (b) within the Free State, (i) outside urban areas within (ff) critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans."
- <u>Activity 18 (b)(i)(hh) (GN.R 324):</u> "The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (b) in the Free State (i) outside urban areas, within (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."

Activities required for the development of the solar facility which are listed under Listing Notice 1, 2 and 3 (GNR 327, 325 and 324) implies that the development could potentially have an impact on the environment that will require mitigation. Subsequently a 'thorough assessment process' is required as described in Regulations 21-24 of the EIA Regulations in order to obtain Environmental



Authorisation. Environamics has been appointed as the independent consultant to undertake the Environmental Impact Assessment (EIA) on behalf of Makoaneng Solar Power Plant (RF) (Pty) Ltd.

Regulation 21 of the EIA Regulations requires that a scoping report must contain the information set out in Appendix 2 of the Regulations or comply with a protocol or minimum information requirements relevant to the application as identified and gazetted by the Minister in a government notice. Appendix 2 of GNR326 requires that information which is necessary for a proper understanding of the process, informing all preferred alternatives, including location alternatives, the scope of the assessment, and the consultation process undertaken be set out in the scoping report.

It has been determined through the scoping process that the proposed development will have a net positive impact for the area and will subsequently ensure the optimal utilisation of resources and land. All negative environmental impacts can be effectively mitigated through the recommended mitigation measures and no residual negative impacts are foreseen. The potentially most significant environmental impacts associated with the development, as identified in this scoping phase, are briefly summarised below.

It must be noted that the EIA phase of the project will consider the impacts on a more detailed level and provide feedback on the facility layout for the proposed project.

Impacts during the construction phase:

During the construction phase minor negative impacts are foreseen over the short term. The latter refers to a period of 12-18 months. The potentially most significant impacts relate to habitat destruction caused by clearance of vegetation and socio-economic impacts such as the creation of direct and indirect employment opportunities, economic multiplier effects from the use of local goods and services and temporary increase in traffic disruptions and movement patterns.

Impacts during the operational phase:

During the operational phase the site will serve as a solar PV energy facility and the potential impacts will take place over a period of 20 - 25 years. The negative impacts are generally associated with habitat destruction caused by clearance of vegetation, displacement of priority avian species from important habitats, collision and electrocutions of avifauna and visual impact of sensitive visual receptors located within a 500m radius of the proposed power line. The provision of sustainable services delivery also needs to be confirmed. The operational phase will have a direct positive impact through the creation of employment opportunities and skills development, development of non-polluting, renewable energy infrastructure and contribution to economic development and social upliftment.

Impacts during the decommissioning phase:

The negative impacts generally associated with the decommissioning phase include habitat destruction caused by clearance of vegetation and the loss of permanent employment. However, skilled staff will be eminently employable, and a number of temporary jobs will also be created in the process. It is not expected that the facility will be decommissioned, but rather that the technology used will be upgraded.

Cumulative impacts:



Cumulative impacts could arise as other similar projects are constructed in the area. According to the Department of forestry, Fisheries and Environment database three (03) other solar plants have been proposed in relatively close proximity to the proposed activity.

The potential for cumulative impacts may therefore exist. The Draft Scoping Report includes an assessment of the potential cumulative impacts associated with the proposed development. Potential cumulative impacts with a significance rating of negative medium during the construction phase relate to: habitat destruction and fragmentation, impact on the characteristics of the watercourse, displacement of priority avian species from important habitats, loss of important avian habitats, impacts of employment opportunities, business opportunities and skills development and impact associated with large-scale in-migration of people. Cumulative impacts of the operational phase relate to: habitat destruction and fragmentation, impacts on the characteristics of the watercourse and visual intrusion. The cumulative effect of the generation of waste was identified as being potentially significant during the decommissioning phase.

Regulation 23 of the EIA Regulations determine that an EIA report be prepared and submitted for the proposed activity after the competent authority approves the final scoping report. The EIA report will evaluate and rate each identified impact and identify mitigation measures that may be required. The EIA report will contain information that is necessary for the competent authority to consider the application for Environmental Authorisation and to reach a decision contemplated in Regulation 24 of the EIA Regulations.



This section aims to introduce the Scoping Report and specifically to address the following requirements of the regulations:

Appendix 2. (2) A scoping report (...) must include- (a) details of:

(i) the EAP who prepared the report; and

(ii) the expertise of the EAP, including a curriculum vitae.

1.1 LEGAL MANDATE AND PURPOSE OF THE REPORT

The National Environmental Management Act identifies listed activities (in terms of Section 24) which are likely to have an impact on the environment. These activities cannot commence without obtaining an Environmental Authorisation (EA) from the relevant competent authority. Sufficient information is required by the competent authority to make an informed decision and the project is therefore subject to an environmental assessment process which can be either a Basic Assessment Process or a full Scoping and Environmental Impact Assessment process.

The Listing Notices 1, 2 and 3 (GNR 327, 325 and 324) outline the activities that may be triggered and therefore require EA. The following listed activities with special reference to the proposed development is triggered:

Relevant notice:	Activity No (s)	Description of each listed activity as per project description:
GNR. 327 (as amended in 2017)	Activity 11(ii)	 <i>"The development of facilities or infrastructure for the transmission and distribution of electricity (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts."</i> Activity 11(i) is triggered since the proposed photovoltaic solar facility will transmit and distribute electricity of 132 kilovolts outside an urban area. Generation from the facility will tie in with the existing Eskom Harvard/Merapi 1 275/22kV Existing Line. The connection power line will be constructed within the limits of the grid connection corridor.
GNR. 327 (as amended in 2017)	Activity 12(ii)(c)	 "The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (c) within 32 meters of a watercourse measured from the edge of a watercourse." Activity 12(ii)(a)(c) is triggered based on the presence of wetlands located within 32m of the development

Table 1.1: Listed activities



		footprint of the proposed the Makoaneng Solar Power Plant.
GNR. 327 (as amended in 2017)	Activity 14	 "The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres." Activity 14 is triggered since the proposed development will need to develop infrastructure for the storage and handling of dangerous goods (diesel) in containers with combined capacity of 80 cubic metres.
GNR. 327 (as amended in	Activity 24(ii)	• <i>"The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters.</i>
2017)		• Activity 24(ii) is triggered as the roads will vary between 6 and 10 meters in width. The internal roads will be up to 6m in width and the perimeter road will be up to 8m in width.
GNR. 327 (as amended in 2017)	Activity 28(ii)	 "Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare."
		 Activity 28(ii) is triggered as portions of the affected property have been used for grazing and the property will be re-zoned to "special" use for the proposed development. The development footprint of the solar power plant will be 844 hectares.
GNR. 327 (as amended in 2017)	Activity 56(ii)	• "The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre (ii) where no reserve exists, where the existing road is wider than 8 metres"
		 Activity 56 (ii) is triggered since the existing access to the affected property will need to be widened by more than 6 metres.
GNR. 325 (as	Activity 1	• "The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more."



amended in 2017)		• Activity 1 is triggered since the proposed photovoltaic solar facility will generate up to 550 megawatts electricity through the use of a renewable resource.
GNR. 325 (as amended in	Activity 15	• "The clearance of an area of 20 hectares or more of indigenous vegetation."
2017)		 Activity 15 is triggered since portions of the site has not been lawfully disturbed during the preceding ten years; therefore, more than 20 hectares of indigenous vegetation will be removed. The development footprint of the solar power plant will be 844ha in extent.
GNR. 324 (as amended in 2017)	Activity 10 (b)(i)(hh)	• "The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (b) in the Free State, (i) outside urban areas, (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."
		 Activity 10(b)(i)(hh) is triggered since the proposed development will need to develop infrastructure for the storage and handling of dangerous goods (diesel and oils) in containers with a capacity exceeding 30 but not exceeding 80 cubic metres. The project is located within the Free State Province. Wetlands (including drainage channels, seepage wetland, an artificial dam, unchanneled valley bottom and a depression wetland) are located within 100 metres of the development footprint for the proposed Makoaneng Solar Power Plant.
GNR. 324 (as amended in 2017)	Activity 12 (b)(vi)	• "The clearance of an area of 300 square metres or more of indigenous vegetation (b) in the Free State, (vi) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."
		 Activity 12 (b)(vi) is triggered since the proposed development is located in the Free State province and portions of the site has not been lawfully disturbed during the preceding ten years and therefore indigenous vegetation is present on the site. In terms of vegetation type the site falls within the Winburg Grassy Shrubland (Gh7) which is classified as 'Least threatened' and Central Free State Grassland (Gh6) which is classified as 'Vulnerable'. Furthermore, wetlands (including drainage



		·
		channels, seepage wetland, an artificial dam, unchanneled valley bottom and a depression wetland) are located within 100 metres of the development footprint for the proposed Makoaneng solar Power Plant. The development footprint of the solar power plant will be 844ha in extent.
GNR. 324 (as amended in 2017)	Activity 14(ii)(c)(b)(i)(ff)	 "The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more, where such development occurs (c) within 32 metres of a watercourse, measured from the edge of a watercourse, (b) within the Free State, (i) outside urban areas within (ff) critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans."
		 Activity 14(ii)(c)(b)(i)(ff) is triggered based on the presence of wetlands (including drainage channels, seepage wetland, an artificial dam, unchanneled valley bottom and a depression wetland) located within 32 metres of the development footprint for the proposed Makoaneng Solar Power Plant. A section of the development footprint is located within a ESA 1 and ESA 2 area.
GNR. 324 (as amended in 2017)	Activity 18 (b)(i)(hh)	• "The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (b) in the Free State (i) outside urban areas, within (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."
		 Activity 18 (b)(i)(hh) is triggered since the existing access road to the site will need to be widened by more than 4 metres. The project is located within the Free State Province and outside urban areas. Wetlands (including drainage channels, seepage wetland, an artificial dam, unchanneled valley bottom and a depression wetland) are located within 100 metres of the development footprint for the proposed Makoaneng Solar Power Plant.

The activities triggered under Listing Notice 1, 2 and 3 (Regulation 327, 325 and 324) for the project implies that the development is considered as potentially having a significant impact on the environment. Subsequently a 'thorough assessment process' is required as described in Regulations 21-24. According to Appendix 2 of Regulation 326 the objective of the scoping process is to, through a consultative process:

• Identify the relevant policies and legislation relevant to the activity;



- Motivate the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location;
- Identify and confirm the preferred activity and technology alternative through an identification of impacts and risks and ranking process of such impacts and risks;
- Identify and confirm the preferred site, through a detailed site selection process, which
 includes an identification of impacts and risks inclusive of identification of cumulative
 impacts and a ranking process of all the identified alternatives focusing on the
 geographical, physical, biological, social, economic, and cultural aspects of the
 environment;
- Identify the key issues to be addressed in the assessment phase;
- Agree on the level of assessment to be undertaken, including the methodology to be applied, the expertise required as well as the extent of further consultation to be undertaken to determine the impacts and risks the activity will impose on the preferred site through the life of the activity, including the nature, significance, consequence, extent, duration and probability of the impacts to inform the location of the development footprint within the preferred site; and
- Identify suitable measures to avoid, manage or mitigate identified impacts and to determine the extent of the residual risks that need to be managed and monitored.

This Draft Scoping Report has been submitted to the Department of Forestry, Fisheries and the Environment (DFFE) for review and comment. According to Regulation 326 all registered I&APs and relevant State Departments (including Organs of State) must be allowed the opportunity to review and provide comment on the scoping report. The Draft Scoping Report has been made available to I&APs and all relevant State Departments. They have been requested to provide written comments on the report within 30 days of receiving it. All issues to be identified and comments received during the review period will be documented and compiled into a Comments and Response Report to be included as part of this Final Scoping Report. Where comments have been received prior to the release of the Draft Scoping Report for the 30-day review and comment period, these comments have been included in Appendix C5 and C6 and has also been included and responded to in the Comments and Responses Report (Appendix C7).

1.2 DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP)

Environamics was appointed by the applicant as the independent EAP to conduct the EIA and prepare all required reports. All correspondence to the EAP can be directed to:

Contact person:	Mr. Herman Alberts
EAPASA Registration:	2019/1328
Postal Address:	14 Kingfisher Street, Tuscany Ridge Estate, Potchefstroom, 2531
Telephone:	063 685 2093 (Cell)
Electronic Mail:	herman@solis-environmental.co.za
And/or	



Contact person:Ms. Christia van DykPostal Address:14 Kingfisher Street, Tuscany Ridge Estate, Potchefstroom, 2531Telephone:078 470 5252 (Cell)Electronic Mail:christia@solis-environmental.co.za

Regulation 13(1)(a) and (b) determines that an independent and suitably qualified and experienced EAP should conduct the EIA. In terms of the independent status of the EAP a declaration is attached as Appendix A to this report. The expertise of the EAP responsible for conducting the EIA is also summarized in the curriculum vitae included as part of Appendix A.

1.3 DETAILS OF SPECIALISTS

Table 1.2 provides information on the specialists that have been appointed as part of the EIA process. Regulation 13(1)(a) and (b) determines that an independent and suitably qualified, experienced and independent specialist should conduct the specialist study, in the event where the specialist is not independent, a specialist should be appointed to externally review the work of the specialist as contemplated in sub regulation (2), must comply with sub regulation 1. In terms of the independent status of the specialists, their declarations are attached as Appendix E to this report. The expertise of the specialists is also summarized in their respective reports.



Table 1.2: Details of specialists

Study	Date	Prepared by	Contact Person	Postal Address	Tel	e-mail
Avifaunal Impact Assessment	April 2023	The Biodiversity Company	Mahomed Desai / Andrew Husted	-	Cell: 081 319 1225	info@thebiodiversitycompany.com
Terrestrial Biodiversity, and Wetland Impact Assessments	April 2023	The Biodiversity Company	Marnus Erasmus / Andrew Husted	-	Cell: 081 319 1225	info@thebiodiversitycompany.com
Heritage and Palaeontological Impact Assessment	July 2023	CTS Heritage	Jenna Lavin	-	Cell: 076 790 6777	info@ctsheritage.com
Agricultural Impact Assessment	July 2023	The Biodiversity Company	Matthew Mamera / Andrew Husted	-	Cell: 081 319 1225	info@thebiodiversitycompany.com
Visual Impact Assessment	August 2023	Donaway Environmental Consultants	Johan Botha	30 Fouche Street Steynsrus, 9515	Tel: 082 316 7749	johan@donnawayl.co.za
Social Impact Assessment	August 2023	Donaway Environmental Consultants	Johan Botha	30 Fouche Street Steynsrus, 9515	Cell: 082 493 5166	johan@donnawayl.co.za
Traffic Assessment Study	August 2023	BVi Consulting Engineers	DJP van der Merwe	Edison Square, Century City, 7441	Cell: 060 557 7467	dirkvdm@bviwc.co.za



1.4 STATUS OF THE EIA PROCESS

The EIA process is conducted strictly in accordance with the stipulations set out in Regulations 21-24 of Regulation No. 326. Table 1.3 provides a summary of the EIA process and future steps to be taken. It can be confirmed that to date:

- A newspaper advertisement was placed in the Bloem News on 16 February 2023, informing the public of the EIA process and for the public to register as I&APs.
- A site visit was conducted by the EAP on 28 February 2023.
- Site notices were erected on site on 28 February 2023 informing the public of the commencement of the EIA process.
- A pre-application meeting request and was submitted to DFFE on 07 August 2023.
- The DFFE confirmed no pre-application meeting was necessary per email on 11 August 2023.
- An application form and the draft Scoping Report has been submitted to DFFE on **11 August 2023.**
- The draft Scoping Report has been made available for a 30-day review and comment period from **11 August 2023 to 11 September 2023**.

It is envisaged that the Final Scoping Report will be submitted to the Department in September 2023 and that the Final Scoping Report will be accepted by the Department in October 2023. The EIA process should be completed within approximately nine months of submission of the Draft Scoping Report, i.e., by April 2024 – see Table 1.3.

Activity	Prescribed timeframe	Timeframe
Site visits	-	February 2023
Public participation (BID)	30 Days	March – April 2023
Conduct specialist studies	2 Months	Feb. – Apr. 2023
Submit application form and DSR	-	11 August 2023
Public participation (DSR)	30	11 Aug. – 11 Sept. 2023
Submit FSR	44	September 2023
Approval of Final Scoping Report	43 Days	October 2023
Submit Draft EIR & EMPr	106 Days	October 2023
Public participation (DEIR)	30 Days	Oct. – Nov. 2023

Table 1.3: Estimated timeframe for completion of the 'scoping and EIA process'



Submission of FEIR & EMPr	-	November 2023
Decision	107 Days	March 2024
Public participation (decision) & submission of appeals	20 Days	Mar. – Apr. 2024

1.5 SPECIALIST STUDIES IDENTIFIED IN THE DFFE SCREENING TOOL REPORT

The table included below provides an indication of the specialist studies identified by the DFFE Screening Tool Report (Appendix B), an indication of whether the studies were undertaken or not and a motivation or confirmation of the studies being included or not.

Study identified in the DFFE Screening Tool and sensitivity	Study included?	Confirmation / motivation
Agricultural Impact Assessment Sensitivity: High	Yes	A Soil and Agricultural Assessment is included in Appendix E5. The high sensitivity is disputed by the report
Landscape / Visual Impact Assessment Sensitivity: Very High	Yes	A Visual Impact Assessment is included in Appendix E4.
Archaeological and Cultural Heritage Impact Assessment Sensitivity: Low	Yes	A Heritage Impact Assessment is included in Appendix E6.
Palaeontological Impact Assessment Sensitivity: Very High	Yes	A Palaeontological Impact Assessment is included in Appendix E6.
Terrestrial Biodiversity Impact Assessment Sensitivity: Very High	Yes	A Terrestrial Biodiversity Impact Assessment is included in Appendix E1. This assessment has been undertaken in terms of the Protocols of GNR320 – refer to the content of the report.
Aquatic Biodiversity Impact Assessment Sensitivity: Very High	Yes	A Wetland / Riparian Impact Assessment is included in Appendix E2. This assessment has been undertaken in terms of the Protocols of GNR320 – refer to the content of the report.
Civil Aviation Assessment Sensitivity: Low	No	The Civil Aviation Authority has been consulted regarding the development of the project since the commencement



		of the EIA Process. No specific negative
		impacts or issues have been raised to date by the CAA regarding the project. The project is also not located within an area considered to be of a high sensitivity.
Defence Assessment Sensitivity: Low	No	The sensitivity for the entire extent of the site is low and therefore no assessment has been included.
RFI Assessment Sensitivity: Medium	No	The RFI theme sensitivity is medium for the entire extent of the project. The South African Radio Astronomy Observatory (SARAO) has been consulted regarding the development of the project since the commencement of the EIA Process. No specific negative impacts or issues have been raised to date by the SARAO regarding the project. The project is also not located within an area considered to be of a high sensitivity.
Socio-Economic Assessment Sensitivity: Not indicated	Yes	A Social Impact Assessment is included in Appendix E7.
Plant species Assessment Sensitivity: Low	Yes	Refer to Appendix E1. The Terrestrial Biodiversity Impact Assessment also includes the relevant Plant Species Assessment. This assessment has been undertaken in terms of the Protocols of GNR320 – refer to the content of the report.
Animal Species Assessment Sensitivity: Medium	Yes	Refer to Appendix E1. The Terrestrial Biodiversity Impact Assessment also includes the relevant Plant Species Assessment. This assessment has been undertaken in terms of the Protocols of GNR320 – refer to the content of the report.



1.6 STRUCTURE OF THE REPORT

This report is structured in accordance with the prescribed contents stipulated in Appendix 2 of Regulation No.326. It consists of eight sections demonstrating compliance to the specifications of the regulations as illustrated in Table 1.4.

Table	1.4:	Structure	of the	report
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Re	quirements for the contents of a scoping report as specified in the Regulations	Section in report
(a)	details of -	
	(i) the EAP who prepared the report; and	1
	ii) the expertise of the EAP, including a curriculum vitae.	
(b)	the location of the activity, including-	
	(i) the 21-digit Surveyor General code of each cadastral land parcel;	
	(ii) where available, the physical address and farm name;	
	(iii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties;	
(c)	a plan which locates the proposed activity or activities applied for at an appropriate scale, or, if it is-	
	(i) a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or	2
	(ii) on land where the property has not been defined, the coordinates within which the activity is to be undertaken;	
(d)	a description of the scope of the proposed activity, including-	
	(i) all listed and specified activities triggered;	
	(ii) a description of the activities to be undertaken, including associated structures and infrastructure.	
(e)	A description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process;	3
(f)	a motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location;	4



(g)	 a full description of the process followed to reach the proposed preferred activity, site and location of the development footprint within the site, including – (i) details of all the alternatives considered; (ii) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs; (iii) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them. (iv) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; (ix) the outcome of the site selection matrix; (x) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such and (xi) a concluding statement indicating the preferred alternatives, including preferred location of the activity; 	5
(g)	 (v) the impacts and risks which have informed the identification of each alternative, including the nature, significance, consequence, extent, duration and probability of such identified impacts, including the degree to which these impacts- (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated; (vi) the methodology used in identifying and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives; (vii) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; (viii) the possible mitigation measures that could be applied and level of residual risk; 	6
(i)	 a plan of study for undertaking the environmental impact assessment process to be undertaken, including- (i) a description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity; (ii) a description of the aspects to be assessed as part of the EIA process; 	8



	(iii) aspects to be assessed by specialists;	
	(iv) a description of the proposed method of assessing the environmental aspects, including aspects to be assessed by specialists;	
	(v) a description of the proposed method of assessing duration and significance;	
	(vi) an indication of the stages at which the competent authority will be consulted;	
	(vii) particulars of the public participation process that will be conducted during the EIA process; and	
	(viii) a description of the tasks that will be undertaken as part of the EIA process;	
	(ix) identify suitable measures to avoid, reverse, mitigate or manage identified	
	impacts and to determine the extent of the residual risks that need to be managed and monitored.	
(j)	an undertaking under oath or affirmation by the EAP in relation to-	
	(i) the correctness of the information provided in the report;	
	(ii) the inclusion of comments and inputs from stakeholders and interested and affected parties; and	Appendix
	(iii) any information provided by the EAP to I&APs and any responses by the EAP to comments or inputs made by I&APs	A to the report
(k)	an undertaking under oath or affirmation by the EAP in relation to the level of agreement between the EAP and I&APs on the plan of study for undertaking the EIA;	
(I)	where applicable, any specific information required by the CA; and	N/A
(m)	any other matter required in terms of section 24(4)(a) and (b) of the Act.	N/A



2 ACTIVITY DESCRIPTION

This section aims to address the following requirements of the regulations:		
Appendix 2. (2) A scoping report () must include-		
(b) the location of the activity, including-		
(i) the 21-digit Surveyor General code of each cadastral land parcel;		
(ii) where available, the physical address and farm name;		
(iii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties;		
(c) a plan which locates the proposed activity applied for at an appropriate scale, or, if it is-		
(i) a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or		
(ii) on land where the property has not been defined, the coordinates within which the activity is to be undertaken;		
(d) a description of the scope of the proposed activity, including-		
(i) all listed and specified activities triggered;		
(ii) a description of the activities to be undertaken, including associated structures and		

2.1 THE LOCATION OF THE ACTIVITY AND PROPERTY DESCRIPTION

infrastructure.

The activity entails the development of a photovoltaic solar facility and associated infrastructure on the Farm Nakob No. 750, Portion 1 of the farm Avondzon No. 278, Remaining Extent of the farm Selborne No. 392, Farm Buxton No. 581 and the Farm Goedehoop No. 251, situated within the Masilonyana Local Municipality area of jurisdiction. The town of Bloemfontein is located approximately 40 km southwest of the proposed development (refer to Figure A for the locality map).

The project entails the generation of up to 550MW AC electrical power through the installation and operation of photovoltaic (PV) panels. The total footprint of the project will approximately be 844 hectares (including supporting infrastructure on site), within the assessed 1260 hectares. Refer to Table 2.1 for general site information.

The property on which the facility is to be constructed will be leased by Makoaneng Solar Power Plant (RF) (Pty) Ltd from the property owner, Richard Parker, for the life span of the project (minimum of 20 years).

Two infrastructure and ancillary complexes (IAC) are proposed for the facility, infrastructure and ancillary complex 1 (IAC1) and infrastructure and ancillary complex 2 (IAC2). IAC 2 will be connected to IAC 1 via an internal connection, from where the generated electricity will be evacuated to the national grid via the existing Eskom Harvard/Merapi 1 275/22kV Existing Line.



The full extent of the two Infrastructure and Ancillary complexes must be assessed for the placement of the substations and BESS. A new 132kV power line will be constructed to connect the solar power plant to one of the two connection points.

For the placement of the new power line one grid connection corridor is being assessed with a length of up to 6km and 100m and up to 480m in width. All three connection points are located with the corridor.

Description of affected farm	Solar Power Plant
portion	Farm Nakob No. 750
	Portion 1 of the farm Avondzon No. 278
	Remaining Extent of the farm Selborne No. 392
	Farm Buxton No. 581
	Farm Goedehoop No. 251
	Power Line Corridor
	Farm Buxton No. 581
Province	Free State
District Municipality	Lejweleputswa District Municipality
Local Municipality	Masilonyana Local Municipality
Ward numbers	8
Closest towns	Bloemfontein is located approximately 40 km south west
	of the proposed development.
21 Digit Surveyor General codes	Solar Power Plant:
	Farm Nakob No. 750
	F0060000000075000000
	Portion 1 of the farm Avondzon No. 278
	F006000000027800001
	Remaining Extent of the farm Selborne No. 392
	F0320000000039200000
	Farm Buxton No. 581
	F0320000000058100000
	Farm Goedehoop No. 251
	F0320000000025100000



	<u>Powerline:</u> Farm Buxton No. 581 F0320000000058100000
Type of technology	Photovoltaic solar facility
Structure Height	Panels ~6m, buildings ~ 6m, power line ~32m and battery storage facility ~8m height
Battery storage	5,5-hectare area
Surface area to be covered (Development footprint)	Approximately 844 ha
EIA footprint (ha) – Area to be assessed	Assessed 1260 ha
Structure orientation	The panels will either be fixed to a single-axis horizontal tracking structure where the orientation of the panel varies according to the time of the day, as the sun moves from east to west or tilted at a fixed angle equivalent to the latitude at which the site is located in order to capture the most sun.
Generation capacity	Up to 550 MW

The site is located in a rural area and is bordered by agricultural land uses. The site survey revealed that the affected property currently consists of agricultural activities – refer to plates 1-11 for photographs of the affected property and proposed development footprint area.

2.2 ACTIVITY DESCRIPTION

The proposed development will trigger the following activities:

Relevant notice:	Activity No (s)	Description of each listed activity as per project description:
GNR. 327 (as amended in 2017)	Activity 11(ii)	• "The development of facilities or infrastructure for the transmission and distribution of electricity (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts."
		 Activity 11(i) is triggered since the proposed photovoltaic solar facility will transmit and distribute electricity of 132 kilovolts outside an urban area.



		Generation from the facility will tie in with the existing Eskom Harvard/Merapi 1 275/22kV Existing Line. The connection power line will be constructed within the limits of the grid connection corridor.
GNR. 327 (as amended in 2017)	Activity 12(ii)(c)	• "The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (c) within 32 meters of a watercourse measured from the edge of a watercourse."
		 Activity 12(ii)(a)(c) is triggered based on the presence of wetlands located within 32m of the development footprint of the proposed the Makoaneng Solar Power Plant.
GNR. 327 (as amended in 2017)	Activity 14	• "The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres."
		 Activity 14 is triggered since the proposed development will need to develop infrastructure for the storage and handling of dangerous goods (diesel) in containers with combined capacity of 80 cubic metres. The capacity will not exceed 500 cubic metres.
GNR. 327 (as amended in	Activity 24(ii)	• <i>"The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters.</i>
2017)		• Activity 24(ii) is triggered as the roads will vary between 6 and 10 meters in width. The internal roads will be up to 6m in width and the perimeter road will be up to 8m in width.
GNR. 327 (as amended in 2017)	Activity 28(ii)	• "Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare."
		 Activity 28(ii) is triggered as portions of the affected property have been used for grazing and the property will be re-zoned to "special" use for the proposed development. The development footprint of the solar power plant will be 844 hectares.



GNR. 327 (as amended in 2017)	Activity 56(ii)	 "The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre (ii) where no reserve exists, where the existing road is wider than 8 metres" Activity 56 (ii) is triggered since the existing access to the affected property will need to be widened by more than 6 metres.
GNR. 325 (as amended in 2017)	Activity 1	 <i>"The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more."</i> Activity 1 is triggered since the proposed photovoltaic solar facility will generate up to 550 megawatts electricity through the use of a renewable resource.
GNR. 325 (as amended in 2017)	Activity 15	 <i>"The clearance of an area of 20 hectares or more of indigenous vegetation."</i> Activity 15 is triggered since portions of the site has not been lawfully disturbed during the preceding ten years; therefore, more than 20 hectares of indigenous vegetation will be removed. The development footprint of the solar power plant will be 844ha in extent.
GNR. 324 (as amended in 2017)	Activity 10 (b)(i)(hh)	 "The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (b) in the Free State, (i) outside urban areas, (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."
		 Activity 10(b)(i)(hh) is triggered since the proposed development will need to develop infrastructure for the storage and handling of dangerous goods (diesel and oils) in containers with a capacity exceeding 30 but not exceeding 80 cubic metres. The project is located within the Free State Province. Wetlands (including drainage channels, seepage wetland, an artificial dam, unchanneled valley bottom and a depression wetland) are located within 100 metres of the development footprint for the proposed Makoaneng Solar Power Plant.
GNR. 324 (as	Activity 12 (b)(vi)	• "The clearance of an area of 300 square metres or more of indigenous vegetation (b) in the Free State, (vi) areas



amended in 2017)		within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."
		 Activity 12 (b)(vi) is triggered since the proposed development is located in the Free State province and portions of the site has not been lawfully disturbed during the preceding ten years and therefore indigenous vegetation is present on the site. In terms of vegetation type the site falls within the Winburg Grassy Shrubland (Gh7) which is classified as 'Least threatened' and Central Free State Grassland (Gh6) which is classified as 'Vulnerable'. Furthermore, wetlands (including drainage channels, seepage wetland, an artificial dam, unchanneled valley bottom and a depression wetland) are located within 100 metres of the development footprint for the proposed Makoaneng solar Power Plant. The development footprint of the solar power plant will be 844ha in extent.
GNR. 324 (as amended in 2017)	Activity 14(ii)(c)(b)(i)(ff)	 "The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more, where such development occurs (c) within 32 metres of a watercourse, measured from the edge of a watercourse, (b) within the Free State, (i) outside urban areas within (ff) critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans."
		 Activity 14(ii)(c)(b)(i)(ff) is triggered based on the presence of wetlands (including drainage channels, seepage wetland, an artificial dam, unchanneled valley bottom and a depression wetland) located within 32 metres of the development footprint for the proposed Makoaneng Solar Power Plant. A section of the development footprint is located within a ESA 1 and ESA 2 area.
GNR. 324 (as amended in 2017)	Activity 18 (b)(i)(hh)	• "The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (b) in the Free State (i) outside urban areas, within (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."
		 Activity 18 (b)(i)(hh) is triggered since the existing access road to the site will need to be widened by more than 4 metres. The project is located within the Free State Province and outside urban areas. Wetlands (including drainage channels, seepage wetland, an artificial dam,



are located within 100 metres of the developme footprint for the proposed Makoaneng Solar Pow Plant.
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The potentially most significant impacts will occur during the construction phase of the development, which will include the following activities:

- <u>Site clearing and preparation:</u> Certain areas of the site and access road will need to be cleared of vegetation and some areas may need to be levelled.
- <u>Civil works to be conducted:</u>
- Terrain levelling if necessary– Levelling will be minimal as the potential site chosen is relatively flat.
- Laying foundation- The structures will be connected to the ground through cement pillars, cement slabs or metal screws. The exact method will depend on the detailed geotechnical analysis.
- Construction of access and inside roads/paths existing paths will be used where reasonably possible. An internal site road network will also be required to provide access to the solar field and associated infrastructure. Additionally, the turning circle for trucks will also be taken into consideration.
- Trenching all Direct Current (DC) and Alternating Current (AC) wiring within the PV plant will be buried underground. Trenches will have a river sand base, space for pipes, backfill of sifted soil and soft sand and concrete layers where vehicles will pass.

2.3 PHOTOVOLTAIC TECHNOLOGY

The term photovoltaic describes a solid-state electronic cell that produces direct current electrical energy from the radiant energy of the sun through a process known as the Photovoltaic Effect. This refers to light energy placing electrons into a higher state of energy to create electricity. Each PV cell is made of silicon (i.e. semiconductors), which is positively and negatively charged on either side, with electrical conductors attached to both sides to form a circuit. This circuit captures the released electrons in the form of an electric current (direct current). The key components of the proposed project are described below:

- <u>PV Panel Array</u> To produce up to 550MW, the proposed facilities will require numerous linked cells placed behind a protective glass sheet to form a panel. Multiple panels will be required to form the solar PV arrays which will comprise the PV facility. The PV panels will be mounted on a single axis tracking systemin order to capture the most sun.
- <u>Wiring to Inverters -</u> Sections of the PV array will be wired to inverters. The inverter is a pulse width mode inverter that converts direct current (DC) electricity to alternating current (AC) electricity at grid frequency.
- <u>Connection to the grid -</u> Connecting the array to the electrical grid requires transformation of the voltage from 480V to 33kV to 132kV. The normal components and dimensions of a



distribution rated electrical substation will be required. Output voltage from the inverter is approximately 480V and this is fed into step up transformers to 132kV. An onsite facility substation and switching stations will be required on the site to step the voltage up to 132kV, after which the power will be evacuated into the national grid via the proposed power line. Generation from the facility will tie in with the existing Eskom Harvard/Merapi 1 275/22kV Existing Line. The connection power line will be constructed within the limits of the grid connection corridor. Two infrastructure and ancillary complexes (IAC) are proposed for the facility, infrastructure and ancillary complex 1 (IAC1) and infrastructure and ancillary complex 2 (IAC2). The facility substations will be constructed within the Infrastructure and Ancillary Complexes. IAC 2 will be connected to IAC 1 via an internal connection, from where the generated electricity will be evacuated to the national grid via the existing Eskom Harvard/Merapi 1 275/22kV Existing Line. Both the internal connection corridor and the National Grid Connection corridors must be assessed for the placement of the power line. The two infrastructure and ancillary complexes (IAC) that are proposed for the facility must be fully assessed for the placement of a substation and BESS.

- <u>Electrical reticulation network An internal electrical reticulation network will be</u> required and will be lain ~2-4m underground as far as practically possible.
- <u>Supporting Infrastructure All associated infrastructure will be constructed within the</u> limits of the infrastructure and ancillary complex which will include an on-site substation, Operations and Maintenance buildings etc.
- <u>Battery storage</u> A Battery Storage Facility with a maximum height of 8m and a maximum volume of 1,740 m3 of batteries and associated operational, safety and control infrastructure.
- <u>Roads</u> Access will be obtained via an existing grave road off of the N1 National Road. An
 internal site road network will also be required to provide access to the solar field and
 associated infrastructure.
- <u>Fencing -</u> For health, safety and security reasons, the facility will be required to be fenced off from the surrounding farm. Fencing with a height of 2.5 meters will be used.

2.4 LAYOUT DESCRIPTION

The layout plan will consider and adhere to the limitations of the site and aspects such as environmentally sensitive areas, roads, fencing and servitudes on site – refer to Figure G and H. The total surface area proposed for the layout includes the PV panel arrays (spaced to avoid shadowing), access and maintenance roads and associated infrastructure (buildings, power inverters, power line, battery energy storage system, on-site substation and switching station and perimeter fences). Limited features of environmental significance exist on site, however the sensitivities that do exist have to be avoided in the layout of the solar facility (refer to Figure G and H). Table 2.3 below provides detailed information regarding the layout for the proposed facility as per DFFE requirements.



Table 2.3: Technical details for the proposed facility

Height of PV panels6 metersArea of PV Array844 hectares (Development footprint)Number of inverters requiredMinimum 50Area occupied by inverter / transformer stations / substations / BESSAll associated infrastructure will be constructed within the limits of the Infrastructure and ancillary complex. BESS: 5.5 ha Substation: 3.6 ha (IPP step-up and Eskom switching/collector) Central inverters + LV/MV trafo: 750 m²Capacity of on-site substation132kVCapacity of on-site substation132kVCapacity of the power line132kVCapacity of be power line132kVCapacity of be power line132kVCapacity of substation instructurePermanent project Area: 844 hectares Construction laydown area 1: within ~ 18 hectaresArea occupied by both permanent and construction laydown area 2: within ~ 20 hectaresInfrastructure & Ancillary Complex 1: ~ 20 hectaresArea occupied by supporting infrastructureInfrastructure & Ancillary Complex 1: ~ 20 hectaresArea occupied by supporting infrastructureInfrastructure & Ancillary Complex 1: ~ 20 hectaresArea occupied by supporting infrastructureMaximum height: 8m Maximum volume: 1740 m³Length of access roads8 m to 10 mLength of internal roadsTBCWidth of internal roadsTBCWidth of internal roads6 m - 8 mGrid connection corridor width (connection to national grid)177 mInternal grid connection corridor length32 kmPower line servitude width40 m up to 80 m in the widest sectionsIntern	Component	Description / dimensions
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Power line servitude width 32m		
Height of fencing 2.5 meters	Power line servitude width	
	Height of fencing	2.5 meters

Table 2.4 provide the coordinate points for the proposed project site, associated infrastructure and grid connection corridor.



Table 2.4: Coordinates

Coordinates					
Project Site (PV Area Site	А	28°56'54.58"S	26°38'41.10"E		
1)	В	28°57'10.65"S	26°39'30.37"E		
	С	28°57'15.48"S	26°39'30.37"E		
	D	28°57'18.07"S	26°39'24.76"E		
	E	28°57'22.05"S	26°39'20.86"E		
	F	28°57'25.55"S	26°39'20.85"E		
	G	28°57'31.31"S	26°39'6.91"E		
	Н	28°57'32.31"S	26°38'57.04"E		
	Ι	28°57'43.77"S	26°38'58.37"E		
	J	28°57'43.80"S	26°39'4.00"E		
	К	28°57'49.85"S	26°39'2.83"E		
	L	28°58'12.81"S	26°39'4.16"E		
	М	28°58'20.26"S	26°39'2.65"E		
	Ν	28°58'44.86"S	26°39'12.54"E		
	0	28°58'46.94"S	26°38'59.09"E		
	Р	28°58'45.93"S	26°38'58.18"E		
	Q	28°58'45.96"S	26°38'47.90"E		
	R	28°58'26.82"S	26°38'29.81"E		
	S	28°57'50.90"S	26°37'47.41"E		
	Т	28°57'41.19"S	26°37'54.71"E		
	U	28°57'49.54"S	26°38'3.07"E		
	V	28°57'49.45"S	26°38'12.08"E		
	W	28°57'36.61"S	26°38'12.11"E		
	Х	28°57'39.84"S	26°38'45.10"E		
	Y	28°57'36.10"S	26°38'44.77"E		
	Z	28°57'35.19"S	26°38'45.79"E		
	AA	28°57'32.10"S	26°38'45.86"E		
	AB	28°57'31.72"S;	26°38'44.36"E		
(PV Area Site 2)	А	28°57'39.29"S	26°37'33.65"E		
	В	28°58'26.80"S	26°38'29.78"E		
	С	28°59'21.55"S	26°37'46.92"E		
	D	28°59'21.55"S	26°37'11.79"E		
	Е	28°59'7.67"S	26°37'7.15"E		
	F	28°59'7.68"S	26°37'30.37"E		
	G	28°58'59.65"S	26°37'38.65"E		
	Н	28°58'57.74"S	26°37'38.60"E		
	I	28°58'56.97"S	26°37'3.73"E		
	J	28°58'45.90"S	26°37'3.42"E		
	К	28°58'34.20"S	26°37'24.97"E		
	L	28°58'24.08"S	26°37'24.92"E		
	М	28°58'24.05"S	26°36'53.01"E		
	N	28°58'3.28"S	26°36'46.10"E		
Proposed Access Option 1	1	28°51'8.98"S	26°34'16.04"E		
	2	28°51'15.22"S	26°34'25.51"E		



	-		,
	3	28°51'28.47"S	26°35'19.16"E
	4	28°51'31.82"S	26°35'37.92"E
	5	28°51'35.17"S	26°36'5.63"E
	6	28°51'43.37"S	26°36'46.44"E
	7	28°51'44.58"S	26°36'50.45"E
	8	28°51'47.75"S	26°36'55.64"E
	9	28°52'34.65"S	26°37'46.40"E
	10	28°53'14.93"S	26°38'21.57"E
	11	28°53'15.75"S	26°38'23.34"E
	12	28°53'25.10"S	26°38'57.26"E
	13	28°53'25.97"S	26°38'58.93"E
	14	28°53'28.27"S	26°39'1.22"E
	15	28°53'52.61"S	26°39'16.01"E
	16	28°53'58.57"S	26°39'13.00"E
	17	28°54'0.18"S	26°39'12.74"E
	18	28°54'2.25"S	26°39'12.73"E
	19	28°54'33.99"S	26°39'14.98"E
	20	28°54'38.01"S	26°39'14.45"E
	21	28°54'40.91"S	26°39'13.70"E
	22	28°54'43.79"S	26°39'11.92"E
	23	28°54'58.43"S	26°38'57.23"E
	24	28°55'0.17"S	26°38'53.89"E
	25	28°55'27.02"S	26°38'57.72"E
	26	28°55'28.19"S	26°38'58.13"E
	27	28°55'29.88"S	26°38'58.99"E
	28	28°55'57.78"S	26°39'17.14"E
	29	28°56'20.24"S	26°39'37.81"E
	30	28°56'35.86"S	26°39'49.44"E
	31	28°57'0.95"S	26°40'15.70"E
	32	28°57'9.20"S	26°40'2.49"E
	33	28°57'30.91"S	26°39'7.89"E
	34	28°57'32.94"S	26°38'50.71"E
	35	28°57'31.98"S	26°38'44.72"E
Proposed Access Option 2	1	28°51'9.24"S	26°34'15.79"E
	2	28°51'18.31"S	26°34'35.22"E
	3	28°51'45.95"S	26°34'44.07"E
	4	28°52'45.95"S	26°35'15.26"E
	5	28°53'22.58"S	26°35'27.94"E
	6	28°53'59.20"S	26°35'25.77"E
	7	28°54'1.91"S	26°35'26.21"E
	8	28°54'11.92"S	26°35'33.94"E
	9	28°54'14.29"S	26°35'34.51"E
	10	28°54'19.03"S	26°35'34.60"E
	11	28°54'22.36"S	26°35'37.61"E
	12	28°54'25.44"S	26°35'46.05"E
	13	28°54'55.40"S	26°36'15.32"E
	14	28°55'37.61"S	26°36'42.82"E
	15	28°55'38.26"S	26°36'43.77"E
	16	28°55'55.80"S	26°36'55.26"E
	17	28°56'8.12"S	26°37'27.22"E
	18	28°56'24.66"S	26°37'16.31"E
	1 -0		



			, ,
	19	28°56'53.76"S	26°37'56.48"E
	20	28°57'3.96"S	26°38'8.64"E
	21	28°57'10.01"S	26°38'13.61"E
	22	28°57'15.14"S	26°38'22.33"E
	23	28°57'25.11"S	26°38'31.94"E
	24	28°57'27.61"S	26°38'34.84"E
	25	28°57'32.02"S	26°38'44.73"E
	26	28°57'7.37"S	26°38'42.61"E
Alternative Access Road	1	28°55'0.05"S	26°38'54.07"E
	2	28°55'16.31"S	26°38'11.10"E
	3	28°56'1.85"S	26°37'28.34"E
	4	28°56'8.22"S	26°37'27.25"E
Infrastructure & Ancillary	Α	28°56'54.87"S	26°38'41.76"E
Complex:	В	28°57'1.90"S	26°39'3.52"E
Area 1	С	28°57'9.79"S	26°39'3.55"E
	D	28°57'9.73"S	26°38'42.99"E
Infrastructure & Ancillary	А	28°57'39.67"S	26°37'33.58"E
Complex:	В	28°57'52.03"S	26°37'48.33"E
	С	28°57'52.98"S	26°37'47.62"E
Area 2	D	28°57'53.03"S	26°37'27.19"E
132KV OHL corridor	А	28°57'3.30"S	26°38'41.84"E
	В	28°57'3.28"S	26°38'44.07"E
	С	28°57'29.20"S	26°38'45.68"E
	D	28°57'30.87"S	26°38'47.32"E
	E	28°57'40.67"S	26°38'47.31"E
	F	28°57'41.25"S	26°38'46.53"E
	G	28°57'38.16"S	26°38'15.37"E
	H	28°57'39.59"S	26°38'13.54"E
	1	28°57'50.15"S	26°38'13.57"E
	J	28°57'50.80"S	26°38'12.82"E
	K	28°57'50.78"S	26°37'49.33"E
		28°57'52.28"S	26°37'48.17"E
	L		
	M	28°57'52.99"S	26°37'47.60"E
	N	28°57'52.93"S	26°37'44.01"E
	0	28°57'52.13"S	26°37'43.09"E
	Р	28°57'50.14"S	26°37'45.24"E
	Q	28°57'50.89"S	26°37'47.36"E
	R	28°57'49.44"S	26°37'48.51"E
	S	28°57'49.46"S	26°38'10.29"E
	Т	28°57'47.86"S	26°38'12.02"E
	U	28°57'36.51"S	26°38'12.02"E
	V	28°57'39.84"S	26°38'45.11"E
275KV OHL connection	А	28°56'53.21"S	26°38'40.97"E
corridor	В	28°56'50.12"S	26°39'0.14"E
	С	28°57'0.84"S	26°39'0.21"E
	D	28°56'58.30"S	26°38'52.65"E
	E	28°56'58.39"S	26°38'41.43"E
	- А.	28°57'3.23"S	26°38'44.07"E



33/132kV Collector and	В.	28°57'3.26"S	26°38'49.13"E
IPP Substation	C.	28°57'7.91"S	26°38'49.16"E
	D.	28°57'8.00"S	26°38'44.04"E
33/132kV IPP and	Α.	28°57'47.45"S	26°37'42.02"E
Switching Substation	В.	28°57'50.11"S	26°37'45.22"E
	C.	28°57'52.11"S	26°37'43.04"E
	D.	28°57'49.43"S	26°37'39.85"E
275/132 kV Substation	Α.	28°56'57.55"S	26°38'42.86"E
	В.	28°56'57.59"S	26°38'49.12"E
	C.	C. 28°57'3.25"S	26°38'49.15"E
	D.	D. 28°57'3.29"S	26°38'42.91"E

2.5 SERVICES PROVISION

The following sections provides information on services required on the site e.g. water, sewage, refuse removal, and electricity.

2.5.1 Water

Adequate provision of water will be a prerequisite for the development. Water for the proposed development will most likely be obtained from ground water resources or alternatively collected with water trucks from an authorized water service provider and stored on site. The Department of Water and Sanitation has provided a non-binding letter confirming the water resource availability in the relevant catchment management area in order to ensure sustainable water supply (refer to Appendix F for proof of correspondence). A full assessment of the application for water use authorisation will only be undertaken in the event that the project proponent has obtained preferred bidder status by the Department of Mineral Resources and Energy.

The estimated maximum amount of water required during construction is 1200m³ per month during the 18 - 24 months of construction. The estimated maximum amount of water required during the facility's 20 years of production is 4200m³ per annum. The majority of this usage is for the cleaning of the solar panels. Since each panel requires approximately 2 litres of water for cleaning, the total amount of ~500 000 panels will require 1 000 000 litres per wash. It is estimated that the panels may only need to be washed twice per annum, but provision is made for quaternary cleaning (March, May, July, and September). This totals approximately 4,000,000 litres per annum for washing, and allows 200,000 litres per annum (or 548 litres per day) for toilet use, drinking water, etc.

Drinking water supplied will comply with the SANS:241 quality requirements. Water quality from the borehole will be tested to confirm SANS:214 quality, if water quality is not sufficient for drinking, bottled water will be supplied to staff during construction and operational phases of the project.

Water saving devices and technologies such as the use of dual flush toilets and low-flow taps, the management of stormwater, the capture and use of rainwater from gutters and roofs will be considered by the developer. Furthermore, indigenous vegetation will be used during landscaping and the staff will be trained to implement good housekeeping techniques.

2.5.2 Stormwater



To avoid soil erosion, it is recommended that the clearing of vegetation be limited. Stormwater management and mitigation measures will be included in the Environmental Management Programme (EMPr) to be submitted as part of the EIR.

2.5.3 Sanitation and waste removal

Portable chemical toilets will be utilised, that will be serviced privately or by the local municipality. Waste will be disposed of at a licensed landfill site. The construction- and hazardous waste will be removed and disposed of at licensed landfill sites accepting such kinds of wastes. During the operational phase household waste will be removed to a licensed landfill site by a private contractor or by the local municipality. The relevant Local Municipality(s) have been contacted, to formally confirm that it has the capacity to provide the proposed development with these services for the lifetime of the project (20 years). Refer to Appendix F.

2.5.4 Electricity

During the construction phase of the development, electricity will either be generated on site through a small solar system or through the use of generators or the existing Eskom supply on the farm will be utilised. This will depend on the Engineering, Procurement, and Construction (EPC) contractor appointed. During operation electricity use will be limited and will primarily be related to the lighting of the facility and domestic use. Design measures such as the use of energy saving light bulbs will be considered by the developer. During the day, electricity will be sourced from the photovoltaic plant, and from the electricity connection at night.

2.6 Decommissioning of the facility

The operating period will be 20 years from the commencement date of the operation phase. Thereafter two rights of renewal periods of 40 years and 20 years will be relevant. It is anticipated that new PV technologies and equipment will be implemented, within the scope of the Environmental Authorisation, when influencing the profitability of the solar facility.

A likely extension of the plant's lifetime would involve putting new, more efficient, solar panels on the existing structures to improve the efficiency of the facility as the technology improves. The specifications of these new panels will be the same as the current panels under consideration, but the conversion efficiency of sunlight to energy will be greater (comparable to new computer chips, that are the same, but faster and more efficient). If, for whatever reason the plant halts operations, the Environmental Authorisation and contract with the landowner will be respected during the decommissioning phase.

The decommissioning process will consist of the following steps:

- The PV facility would be disconnected from the Eskom grid.
- The BESS, inverters and PV modules would be disconnected and disassembled.
- Concrete foundations (if used) would be removed and the structures would be dismantled.
- Wastewater storage conservancy tank would be responsibly removed and area would be rehabilitated.



- The underground cables would be unearthed and removed and buildings would be demolished and removed.
- The fencing would be dismantled and removed.
- The roads can be retained should the landowner choose to retain them, alternatively the roads will be removed and the compaction will be reversed.
- Most of the wires, steel and PV modules are recyclable and would be recycled to a reasonable extent. The Silicon and Aluminium in PV modules can be removed and reused in the production of new modules.
- Any rubble and non-recyclable materials will be disposed of at a registered landfill facility.

The rehabilitation of the site would form part of the decommissioning phase. The aim would be to restore the land to its original form (or as close as possible). The rehabilitation activities would include the following:

- Removal of all structures and rubble;
- Breaking up compaction where required, loosening of the soil and the redistribution of topsoil; and
- Restoration of the surface to the original contours and application of hydro seeding.



3 LEGISLATIVE AND POLICY CONTEXT

This section aims to address the following requirements of the regulations:

Appendix 2. (2) A scoping report (...) must include-

(e) a description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process;

3.1 INTRODUCTION

Environmental decision making with regards to solar PV plants is based on numerous policy and legislative documents. These documents inform decisions on project level environmental authorisations issued by the National Department of Forestry, Fisheries and the Environment (DFFE) as well as comments from local and district authorities. Moreover, it is significant to note that they also inform strategic decision making reflected in the IDPs and SDFs. Therefore, to ensure streamlining of environmental authorisations it is imperative for the proposed activity to align with the principles and objectives of key national, provincial and local development policies and legislation. The following acts and policies and their applicability to the proposed development are briefly summarised:

- The Constitution of the Republic of South Africa, 1996 (Act No. 108 of 1996)
- National Environmental Management Act, 1998 (Act No. 107 of 1998) [NEMA]
- The National Energy Act, 2008 (Act 34 of 2008)
- National Water Act, 1998 (Act No. 36 of 1998)
- National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)
- National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)
- The National Heritage Resources Act, 1999 (Act No. 25 of 1999)
- Conservation of Agricultural Resources Act, 1983 (Act No. 85 of 1983)
- The National Forests Act, 1998 (Act 84 of 1998)
- The White Paper on the Energy Policy of the Republic of South Africa (1998)
- The White Paper on Renewable Energy (2003)
- Integrated Resource Plan (IRP) for South Africa (2010-2030)
- National Development Plan of 2030
- National Infrastructure Plan of South Africa (2012)
- New Growth Path Framework (2010)
- Climate Change Bill (2018)



- Climate Change Bill (2021) for public comment
- Strategic Integrated Projects (SIPs) (2010 2030)
- Strategic Environmental Assessment (SEA) for wind and solar PV Energy in South Africa (2014)
- Free State Provincial Spatial Development Framework (PSDF) (2012)
- Lejweleputswa District Municipality Final Integrated Development Plan (IDP) 2021 2022 (2021)
- Masilonyana Local Municipality Integrated Development Plan 2022/2023 (2022)
- Masilonyana Municipal Spatial Development Framework Phase 4 (SDF) (2020/2021 2024/2025) (2021)

The key principles and objectives of each of the legislative and policy documents are briefly summarised in Tables 3.1 and 3.2 to provide a reference framework for the implications for the proposed activity.



3.2 LEGISLATIVE CONTEXT

Table 3.1: Legislative context for the construction of photovoltaic solar plants

LEGISLATION	ADMINISTERING AUTHORITY	DATE	SUMMARY / IMPLICATIONS FOR PROPOSED DEVELOPMENT
The Constitution of South Africa (Act No. 108 of 1996)	National Government	1996	The Constitution is the supreme law of the Republic and all law and conduct must be consistent with the Constitution. The Chapter on the Bill of Rights contains a number of provisions, which are relevant to securing the protection of the environment. Section 24 states that "everyone has the right to (a) an environment that is not harmful to their health or well-being and (b) to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that $-$ (i) prevent pollution and ecological degradation; (ii) promote conservation; and (iii) secure ecologically sustainable development. The Constitution therefore, compels government to give effect to the people's environmental right and places government under a legal duty to act as a responsible custodian of the country's environment, to prevent pollution and ecological degradation, promote conservation and secure sustainable development.
			The development of the Makoaneng Solar Power Plant and the aspects related thereto considers the creation of an environment which is not harmful or degraded through the implementation of appropriate mitigation measures.
The National Environmental Management Act (Act No. 107 of 1998)	National Department of Environmental Affairs (now known as the Department of Forestry, Fisheries and the Environment) and the Free State	1998	NEMA provides for co-operative governance by establishing principles and procedures for decision-makers on matters affecting the environment. An important function of the Act is to serve as an enabling Act for the promulgation of legislation to effectively address integrated environmental management. Some of the principles in the Act are accountability; affordability; cradle to grave management; equity; integration; open information; polluter pays; subsidiary; waste avoidance and minimisation; co-operative governance; sustainable development; and environmental protection and justice.



	Province Department		The mandate for EIA lays with the National Environmental Management Act (107 of 1998) and
	of Economic, Small Business Development, Tourism and Environmental Affairs (DESTEA)		the EIA Regulations No. 324, 325, 326, and 327 promulgated in terms of Section 24 of NEMA.The EIA Regulations determine that an Environmental Authorisation is required for certain listed activities, which might have a detrimental effect on the environment.The EIA process undertaken for the Makoaneng Solar Power Plant is in-line with the requirements of NEMA for the Application for Environmental Authorisation.
The National Energy Act (Act No. 34 of 2008)	Department of Mineral Resources and Energy	2008	One of the objectives of the National Energy Act was to promote diversity of supply of energy and its sources. In this regard, the preamble makes direct reference to renewable resources, including solar: "To ensure that diverse energy resources are available, in sustainable quantities, and at affordable prices, to the South African economy, in support of economic growth and poverty alleviation, taking into account environmental management requirements (); to provide for () increased generation and consumption of renewable energies" (Preamble).
			Considering that the Makoaneng Solar Power Plant is proposed to make use of PV technology and the solar resource for the generation of electricity, the proposed project is in-line with the Act.
The National Water Act (Act No. 36 of 1998)	•	1998	Sustainability and equity are identified as central guiding principles in the protection, use, development, conservation, management and control of water resources. The intention of the Act is to promote the equitable access to water and the sustainable use of water, redress past racial and gender discrimination, and facilitate economic and social development. The Act provides the rights of access to basic water supply and sanitation, and environmentally, it provides for the protection of aquatic and associated ecosystems, the reduction and prevention of pollution and degradation of water resources.
			As this Act is founded on the principle that National Government has overall responsibility for and authority over water resource management, including the equitable allocation and beneficial use of water in the public interest, a person can only be entitled to use water if the use is permissible under the Act. Chapter 4 of the Act lays the basis for regulating water use.



		 The site is located within the C42K quaternary catchment and is situated in the Middle Vaal Water Management Area. Drainage occurs as sheet-wash into the drainage channels on site that eventually drains into the major river namely the Doring River that occurs to the south of the project area. Also, should a water use license be required for the project, the National Water Act will be applicable in terms of obtaining the relevant license.
National Environmental Management: Waste Act (Act No. 59 of 2008)	National Department 2008 Environmental Affairs (DEA) (now known as the Department of Forestry, Fisheries and the Environment)	 NEMWA has been developed as part of the law reform process enacted through the White Paper on Integrated Pollution and Waste Management and the National Waste Management Strategy (NWMS). The objectives of the Act relate to the provision of measures to protect health, well-being and the environment, to ensure that people are aware of the impact of waste on their health, well-being and the environment, to provide for compliance with the measures, and to give effect to section 24 of the Constitution in order to secure an environment that is not harmful to health and well-being. Regulations No. R921 (of 2013) promulgated in terms of Section 19(1) of the National Environmental Management: Waste Act (59 of 2008) determines that no person may commence, undertake or conduct a waste management activity listed in this schedule unless a license is issued in respect of that activity. It is not envisaged that a waste permit will be required for the proposed development as no listed activities in terms of waste management are expected to be triggered.
National Environment Management: Air Quality Act (Act No. 39 of 2004)	National Department 2004 Environmental Affairs (DEA) (now known as the Department of Forestry, Fisheries and the Environment)	 The object of this Act is to protect the environment by providing reasonable measures for the protection and enhancement of the quality of air in the Republic; the prevention of air pollution and ecological degradation; and securing ecologically sustainable development while promoting justifiable economic and social development. Regulations No. R248 (of 31 March 2010) promulgated in terms of Section 21(1)(a) of the National Environmental Management Act: Air Quality Act (39 of 2004) determine that an Atmospheric Emission License (AEL) is required for certain listed activities, which result in atmospheric emissions which have or may have a detrimental effect on the environment. The Regulation also sets out the minimum emission standards for the listed activities. It is not



			envisaged that an Atmospheric Emission License will be required for the proposed development.
The National Heritage Resources Act (Act No. 25 of 1999)	South Afr Heritage Resou Agency (SAHRA)	rican 19 Irces	The Act aims to introduce an integrated and interactive system for the management of heritage resources, to promote good governance at all levels, and empower civil society to nurture and conserve heritage resources so that they may be bequeathed to future generations and to lay down principles for governing heritage resources management throughout the Republic. It also aims to establish the South African Heritage Resources Agency together with its Council to co- ordinate and promote the management of heritage resources, to set norms and maintain essential national standards and to protect heritage resources, to provide for the protection and management of conservation-worthy places and areas by local authorities, and to provide for matters connected therewith.
			The Act protects and manages certain categories of heritage resources in South Africa. For the purposes of the Heritage Resources Act, a "heritage resource" includes any place or object of cultural significance. In this regard the Act makes provision for a person undertaking an activity listed in Section 28 of the Act to notify the resources authority. The resources authority may request that a heritage impact assessment be conducted if there is reason to believe that heritage resources will be affected.
			A case file has been opened on SAHRIS for the Makoaneng Solar Power Plant and all relevant documents were submitted for their comments and approval. The Heritage Impact Assessment undertaken for the solar power plant is included as Appendix E5, and the Palaeontological Impact Assessment is included as Appendix E6
Conservation of Agricultural Resources Act (Act No. 85 of	National Provincial Government	and 19	The objective of the Act is to provide control over the utilisation of the natural agricultural resources of the Republic in order to promote the conservation of the soil, the water sources and the vegetation and the combating of weeds and invader plants; and for matters connected therewith.
1983)			Consent will be required from the Department of Agriculture, Forestry and Fisheries (now known as the Department of Forestry, Fisheries and the Environment) in order to confirm that



the proposed development is not located on high potential agricultural land and to approve the long term lease agreement.

A Soils and Agricultural Compliance statement has been undertaken for the Makoaneng Solar Power Plant and is included as Appendix E4.

The National	Department of	1998	The purposes of this Act are to:
Forests Act, 1998 (Act 84 of 1998)	Environmental Affairs (now known as the Department of Forestry, Fisheries and the Environment)		 (a) promote the sustainable management and development of forests for the benefit of all; (b) create the conditions necessary to restructure forestry in State forests; (c) provide special measures for the protection of certain forests and trees: (d) promote the sustainable use of forests for environmental, economic, educational, recreational, cultural, health and spiritual purposes. (e) promote community forestry; (f) promote greater participation in all aspects of forestry and the forest products industry by persons disadvantaged by unfair discrimination.
			Section 12(1) read with s15(1) of the NFA stated that the Minister may declare a particular tree, group of trees, woodland; or trees belonging to a particular species, to be a protected tree, group of trees, woodland or species. A list of protected tree species was gazetted in GN 635 of 6 December 2019. The effect of the declaration is that no person may (a) cut, disturb, damage or destroy; or (b) possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, or any forest product derived from a protected tree, except under a license granted by the Minister; or in terms of an exemption published by the Minister in the Gazette.
			A Terrestrial Biodiversity, Plant and Animal Species Impact Assessment has been undertaken for the Makoaneng Solar Power Plant and is included in Appendix E1.



3.3 POLICY CONTEXT

Table 3.2: Policy context for the construction of photovoltaic solar plants

POLICY	ADMINISTERIN G AUTHORITY	DATE	SUMMARY / IMPLICATIONS FOR PROPOSED DEVELOPMENT
The White Paper on the Energy Policy of the Republic of South Africa	Department of Mineral Resources and Energy	1998	 The White Paper on the Energy Policy of the Republic of South Africa establishes the international and national policy context for the energy sector, and identifies the following energy policy objectives: Increasing access to affordable energy services Improving energy governance Stimulating economic development Managing energy-related environmental and health impacts Securing supply through diversity Energy policy priorities The White Paper sets out the advantages of renewable energy and states that Government believes that renewables can in many cases provide the least cost energy service, particularly when social and environmental costs are included. The White Paper acknowledges that South Africa has neglected the development and implementation of renewable energy applications, despite the fact that the country's renewable energy resource base is extensive, and many appropriate applications exist. The White Paper notes that renewable energy applications have specific characteristics that need to be considered. Advantages include: Minimal environmental impacts in operation in comparison with traditional supply technologies; and Generally lower running costs, and high labour intensities. Disadvantages include: Higher capital costs in some cases; Lower energy densities; and



		 Lower levels of availability, depending on specific conditions, especially with sun and wind-based systems. The Makoaneng Solar Power Plant is in line with this policy as it proposes the generation of renewable energy from the solar resource.
The White Paper on Renewable Energy	Department of 200 Mineral Resources and Energy	3 This White Paper on Renewable Energy supplements the <i>White Paper on Energy Policy</i> , which recognises that the medium and long-term potential of renewable energy is significant. This Paper sets out Government's vision, policy principles, strategic goals and objectives for promoting and implementing renewable energy in South Africa.
		The White Paper notes that while South Africa is well-endowed with renewable energy resources that have the potential to become sustainable alternatives to fossil fuels, these have thus far remained largely untapped. Government's long-term goal is the establishment of a renewable energy industry producing modern energy carriers that will offer in future years a sustainable, fully non-subsidised alternative to fossil fuels. The medium-term (10-year) target set in the White Paper is: 10 000 GWh (0.8 Mtoe) renewable energy contribution to final energy consumption by 2013, to be produced mainly from biomass, wind, solar and small-scale hydro. The renewable energy is to be utilised for power generation and non-electric technologies such as solar water heating and bio-fuels. This is approximately 4% (1667 MW) of the projected electricity demand for 2013 (41539 MW) (Executive Summary, ix). The Makoaneng Solar Power Plant is in line with this paper as it proposes the generation of renewable
		energy from the solar resource.
Integrated Resource Plan (IRP) for South Africa	Department of 202 Mineral 203 Resources and Energy	
		renewables, which relates to the proposed Makoaneng Solar Power Plant. In 2010 several changes were



made to the IRP model. The main changes in the IRP were the disaggregation of renewable energy technologies to explicitly display solar photovoltaic (PV), concentrated solar power (CSP), and wind options (RSA, 2011a).

The summary of the IRP further explains that traditional cost-optimal scenarios were developed based on the previously mentioned changes in the IRP. This resulted in the Policy-Adjusted IRP, which stated that:

"The installation of renewables (solar PV, CSP and wind) have been brought forward in order to accelerate a local industry; To account for the uncertainties associated with the costs of renewables and fuels, a nuclear fleet of 9,6 GW is included in the IRP; The emission constraint of the RBS (275 million tons of carbon dioxide per year after 2024) is maintained; and Energy efficiency demand-side management (EEDSM) measures are maintained at the level of the RBS" (RSA, 2011a:6).

"The Policy-Adjusted IRP includes the same amount of coal and nuclear new builds as the RBS, while reflecting recent developments with respect to prices for renewables. In addition to all existing and committed power plants (including 10 GW committed coal), the plan includes 9,6 GW of nuclear; 6,3 GW of coal; 17,8 GW of renewables; and 8,9 GW of other generation sources" (RSA, 2011a:6).

The IRP highlights the commitments before the next IRP. The commitments pertaining to the purpose of the proposed project in renewable energy is: "Solar PV programme 2012-2015: In order to facilitate the connection of the first solar PV units to the grid in 2012 a firm commitment to this capacity is necessary. Furthermore, to provide the security of investment to ramp up a sustainable local industry cluster, the first four years from 2012 to 2015 require firm commitment."

"Solar PV 2016 to 2019: As with wind, grid upgrades might become necessary for the second round of solar PV installations from 2016 to 2019, depending on their location. To trigger the associated tasks in a timely manner, a firm commitment to these capacities is necessary in the next round of the IRP at the latest. By then, the assumed cost decreases for solar PV will be confirmed" (IRP, 2011a:17).

In conclusion the IRP recommends that an accelerated roll-out in renewable energy options should be allowed with regards to the benefits of the localization in renewable energy technologies (RSA, 2011a). It is however important to take note that since the release of the IRP in 2011 there has been a number of developments in the energy sector of South Africa. Therefore, the IRP was updated and was open for comments until March of 2017. The new IRP of 2019 was formally published in October 2019. For the



revision scenario, analysis was conducted. The results revealed that for the period ending 2030 that: "The committed Renewable Energy Independent Power Producers Programme, including the 27 signed projects and Eskom capacity rollout ending with the last unit of Kusile in 2022, will provide more than sufficient capacity to cover the projected demand and decommissioning of plants up to approximately 2025"; "Imposing annual build limits on renewable energy will not affect the total cumulative capacity and the energy mix for the period up to 2030"; and "the scenario without renewable energy annual build limits provides the least-cost option by 2030" (RSA, 2018:34).

Lastly, the draft IRP of 2018 also included the scenario analysis for the period post 2030. Here it was observed that: "Imposing annual build limits on renewable energy will restrict the cumulative renewable installed capacity and the energy mix for this period; adopting no annual build limits on renewables or imposing a more stringent strategy to reduce greenhouse gas emissions implies that no new coal power plants will be built in the future unless affordable cleaner forms of coal-to-power are available; and the scenario without renewable energy annual build limits provides the least-cost option by 2050" (RSA, 2018:34–35).

In the final IRP of 2019 key considerations were taken into account together with required actions to be taken for the IRP of 2019 to be credible. In terms of renewable energy technologies like solar and wind, the IRP stated that *"The application of renewable build limits 'smoothes out' the capacity allocations for wind and solar PV which provides a constant pipeline of projects to investment; this addresses investor confidence"*. The decision stated against this key consideration is to *"retain the current annual build limits on renewables (wind and PV) pending the finalization of a just transition plan"* (RSA, 2019:46). Hereby the IRP also recognises renewable technologies' potential to diversify the electricity mix, create new industries and job opportunities and localize across the value chain (RSA, 2019:13).

The Makoaneng Solar Power Plant is in line with this plan as it proposes the generation of renewable energy from the solar resource and will contribute to the energy mix of the country as set out in this plan.



National Development Plan of 2030	The Presidency: National Planning Commission	-	The National Development Plan aims to "eliminate poverty and reduce inequality by 2030" (RSA, undated). In order to eliminate or reduce inequality, the economy of South Africa needs to grow faster in order to benefit all South Africans. In May 2010 a draft national development plan was drafted, which highlighted the nine (9) key challenges for South Africa. The highest priority areas according to the plan are considered to be the creation of employment opportunities and to improve the quality of national education. In this regard, the plan sets out three (3) priority areas, namely, to raise employment by a faster growing economy, improve the quality of education, and to build the capability of the state in order to play a more developmental and transformative role. One of the key challenges identified was that the economy is unsustainably resource intensive and the acceleration and expansion of renewable energy was identified as a key intervention strategy to address this challenge. The development of the Makoaneng Solar Power Plant will contribute to the intervention strategy as identified within the plan.
National Infrastructure Plan of South Africa	Presidential Infrastructure Coordinating Commission	2012	In the year 2012 the South African Government adopted a National Infrastructure Plan (hereafter referred to as the Plan). The aim of this Plan is to transform the economic landscape, while strengthening the delivery of basic services and creating new employment opportunities. This Plan also supports the integration of African communities, and also sets out the challenges and enablers that our country needs in order to respond to the planning and development of infrastructure with regards to fostering economic growth (RSA, 2012). The Plan has developed eighteen (18) strategic integrated projects (further referred to as SIPs). These SIPs stretch over all nine (9) provinces, covering social and economic infrastructure, and projects that enhances development and growth. Of the eighteen (18), five (5) are geographically focused, three (3) spatial, three (3) energy, three (3) social infrastructure, two (2) knowledge, one (1) regional integration, and one (1) water and sanitation focussed. The three (3) SIPs according to the Plan, which are energy focused and correlate to the proposed project are as follow:
			 SIP 9: Electricity generation to support socio-economic development; and SIP 10: Electricity transmission and distribution for all. SIP 8 according to the Plan "support sustainable green energy initiatives on a national scale through a diverse range of clean energy options as envisaged in the IRP 2010 and support bio-fuel production



	facilities". The purpose of SIP 9 according to the Plan is to "accelerate the construction of new electricity generation capacity in accordance with the IRP 2010 to meet the needs of the economy and address historical imbalances". SIP 9 should also monitor the implementation of major projects such as new power stations like Medupi, Kusile and Ingula. Lastly, SIP 10 aims to "expand the transmission and distribution network to address historical imbalances, provide access to electricity for all and support economic development" (RSA, 2012:20).
	The Makoaneng Solar Power Plant is in line with this plan as it proposes the generation of renewable energy from the solar resource which supports socio-economic development and will contribute to meeting the electricity demand of the country as set out in this plan.
New Growth Department of - Path Economic Framework Development	The New Growth Path was developed after 16 years of South Africa's democracy, to respond to emerging opportunities and risks while building on policies. This framework provides a dynamic vision on how to collectively achieve a more developed, equitable and democratic society and economy. This framework mainly reflects the commitment of the South African Government to create employment opportunities for its people in all economic policies (RSA, 2011b).
	This framework sets out the markers for job creation and growth and also identify where there are viable changes in the character and structure of production, in order to create a more inclusive, greener economy in the long-term. It is stated in the framework that in order for this framework to reach its objectives, the Government is committed to:
	- Identify the possible areas of employment creation; and
	- Develop a policy to facilitate employment creation especially with regards to social equity, sustainable employment and growth in the creation of employment activities (RSA, 2011b).
	This framework also identifies investments in five key areas, one of which is energy. This framework also states that the green economy is a priority area, which includes the construction of and investment in renewable energy technologies like solar (RSA, 2011b). In this regard it will also assist creating employment opportunities over the medium- and long-term.
	Considering that the construction of and investment in renewable energy is a key area identified within the framework, the Makoaneng Solar Power Plant is considered to be in-line with the framework.



Climate Change Bill	Department of Environmental Affairs (now known as the Department of Forestry, Fisheries and the Environment)		 On 08 June 2018 the Minister of Environmental Affairs published the Climate Change Bill ("the Bill") for public comment. The Bill provides a framework for climate change regulation in South Africa aimed at governing South Africa's sustainable transition to a climate resilient, low carbon economy and society. The Bill provides a procedural outline that will be developed through the creation of frameworks and plans. The following objectives are set within the Bill: Provide for the coordinated and integrated response to climate change and its impacts by all spheres of government in accordance with the principles of cooperative governance; Provide for the effective management of inevitable climate change impacts through enhancing adaptive capacity, strengthening resilience and reducing vulnerability to climate change, with a view to building social, economic, and environmental resilience and an adequate national adaptation response in the context of the global climate change response; Make a fair contribution to the global effort to stabilise greenhouse gas concentrations in the atmosphere at a level that avoids dangerous anthropogenic interference with the climate system within a timeframe and in a manner that enables economic, employment, social and environmental development to proceed in a sustainable manner.
Climate Change Bill	National Department of Forestry, Fisheries and the Environment	2021	The Department of Forestry, Fisheries and the Environment has published a new Climate Change Bill for public comment. The bill notes that climate change represents an urgent threat to human societies and the planet, and requires an effective, progressive and incremental response from both government and citizens. It recognises that South Africa has a global responsibility to reduce greenhouse gasses and that the anticipated impacts arising as a result of climate change have the potential to undermine achieving of the country's developmental goals.



The main objective of the bill is to enable the development of an effective climate change response and the long-term, just transition to a climate-resilient and lower-carbon economy and society, and to provide for matters connected therewith.

The Makoaneng Solar Power Plant comprises a renewable energy generation facility and would not result in the generation or release of emissions during its operation.

Strategic The Presidential 2010 -The Presidential Infrastructure Coordinating Committee (PICC) is integrating and phasing investment plans Integrated Infrastructure 2030 across 18 Strategic Infrastructure Projects (SIPs) which have five core functions: to unlock opportunity, **Projects (SIPs)** transform the economic landscape, create new jobs, strengthen the delivery of basic services and support Coordinating Committee the integration of African economies. A balanced approach is being fostered through greening of the economy, boosting energy security, promoting integrated municipal infrastructure investment, facilitating integrated urban development, accelerating skills development, investing in rural development and enabling regional integration. SIP 8 and 9 of the energy SIPs supports the development of the solar energy facility:

- SIP 8: Green energy in support of the South African economy: Support sustainable green energy initiatives on a national scale through a diverse range of clean energy options as envisaged in the Integrated Resource Plan (IRP 2010 – 2030) and supports bio-fuel production facilities.
- SIP 9: Electricity generation to support socio-economic development: The proposed Makoaneng Solar Power Plant is a potential SIP 9 Project as electricity will be generated and social and economic upliftment, development and growth will take place within the surrounding communities. It would become a SIP 9 project if selected as a Preferred Bidder project by the Department of Mineral Resources and Energy. SIP 9 supports the acceleration of the construction of new electricity generation capacity in accordance with the IRP 2010 to meet the needs of the economy and address historical imbalances.

The Makoaneng Solar Power Plant could be registered as a SIP project once selected as a preferred bidder under the REIPPP Programme. The project would then contribute to the above-mentioned SIPs



Strategic Environmental	National Department of	2014	The then Department of Forestry, Fisheries and the Environment (DFFE) has committed to contribute to the implementation of the National Development Plan and National Infrastructure Plan by undertaking
Assessment (SEA) for wind and solar PV Energy in South Africa	Environmental Affairs (now known as the Department of Forestry,		Strategic Environmental Assessments (SEAs) to identify adaptive processes that integrate the regulatory environmental requirements for Strategic Integrated Projects (SIPs) while safeguarding the environment. The wind and solar photovoltaic (PV) SEA was accordingly commissioned by DEA in support of SIP 8, which aims to facilitate the implementation of sustainable green energy initiatives. This SEA identifies areas where large scale wind and solar PV energy facilities can be developed in terms
	Fisheries and the Environment)		of SIP 8 and in a manner that limits significant negative impacts on the environment, while yielding the highest possible socio-economic benefits to the country. These areas are referred to as Renewable Energy Development Zones (REDZs).
			The REDZs also provide priority areas for investment into the electricity grid. Currently one of the greatest challenges to renewable energy development in South Africa is the saturation of existing grid infrastructure and the difficulties in expanding the grid. Proactive investment in grid infrastructure is the likely to be the most important factor determining the success of REDZs. Although it is intended for the SEA to facilitate proactive grid investment in REDZs, such investment should not be limited to these areas. Suitable wind and solar PV development should still be promoted across the country and any proposed development must be evaluated on its own merit.
			The Makoaneng Solar Power Plant is not located within a REDZ, but the development will contribute to the expansion of renewable energy facilities and infrastructure within the country, and provide the positive opportunities associated with it.
Free State Provincial Spatial Development Framework	Free State Provincial Government	2012	The Free State PSDF is a policy document that promotes a 'developmental state' in accordance with national and provincial legislation and directives. It aligns with the Free State Provincial Growth and Development Strategy which has committed the Free State to 'building a prosperous, sustainable and growing provincial economy which reduces poverty and improves social development'. The PSDF includes comprehensive plans and strategies that collectively indicate which type of land-use
(PSDF)			should be promoted in the Province, where such land-use should take place, and how it should be implemented and managed. In broad terms, the PSDF:



•	Indicates the spatial implications of the core development objectives of the Free State Provincial	
	Growth and Development Strategy.	

- Serves as a spatial plan that facilitates local economic development.
- Lays down strategies, proposals and guidelines as it relates to sustainable development.
- Facilitates cross-boundary co-operation between municipalities, adjoining provinces, and bordering countries.
- Serves as a manual for integration and standardisation of the planning frameworks of all spheres of government in the Province.

The Free State Provincial Growth and Development Strategy states that sustainable economic development is the only effective means by which the most significant challenge of the Free State, namely poverty, can be addressed is. The PSDF gives practical effect to sustainable development, which is defined as development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs.

The PSDF is prepared in accordance with bioregional planning principles that were adapted to suit the sitespecific requirements of the Free State. It incorporates and complies with the relevant protocols, conventions, agreements, legislation and policy at all applicable levels of planning, ranging from the international to the local.

The PSDF builds upon achievements and learns from mistakes of the past, reacts to the challenges of our time, incorporates the traditional knowledge of the people of the Free State, and builds upon international best-practice and technology.

The development of the Makoaneng Solar Power Plant is in-line with the framework based on the contributions and opportunities presented by a development of this nature.

LejweleputswaLejweleputswa2021-The long-term vision of the Lejweleputswa DM is to be: "A leader in sustainable development and serviceDistrictDistrict2022delivery to all".MunicipalityMunicipalityThe above stated vision defines what Lejweleputswa District Municipality would like to attain over medium

Integrated

to long-term, and for that achievement to effectively materialize, their mission is: "Providing sound financial management. Providing excellent, vibrant public participation and high quality local municipal



Development Plan (IDP)			support programmes by maintaining good working relations in the spirit of co-operative governance, and enhancing high staff morale, productivity and motivation".
			The IDP identified specific objectives, strategies and projects for the district as per the District Rural Development Plan and the District Rural Development Implementation Plan. Key Performance Area 3 relates to Local Economic Development and lists that the development of a solar plant as one of the Municipal Focus Areas with the objective to revive the regional economy of the District Municipality with the intention of creating sustainable economies.
			Performance Area stated in the IDP.
Masilonyana Local Municipality Integrated Development Plan (IDP)	Masilonyana Local Municipality	2022/ 2023	 The long-term strategic focus is to be a "benchmark developmental municipality in service delivery excellence" which can be attained through: Effective use of scarce resources Attraction of additional funds Improved and speedy service delivery Strengthening of democracy through public participation Promotion of coordinated planning between the Local, Provincial and National Government Planning that works to dismantle the legacy of the past era of apartheid The IDP consider the economy structure and performance of the area and indicates that there is a high dependency on the mining sector which is declining. Therefore, alternatives to the declining sector has to be explored such as gas and renewable energy. The development of the Makoaneng Solar Power Plant will contribute to the goals of the area, albeit to a limited extent.



Masilonyana	Masilonyana	2020/	The SDF provides broad land use management guidelines for the municipal area. Specific development
Municipal	Local	2021-	objectives are identified which related to the development of renewable energy facilities. These include
Spatial	Municipality	2024/	integrated and broad-based agrarian transformation leading to sustainable livelihoods, increased rural
Development		2025	economic development and improved land reform., and efficient, integrated spatial development of
Framework			infrastructure and transport systems in shared focus areas. Both of these objectives refers to the
(SDF)			development of renewable energy facilities, and in particular makes mention of solar power plants.
			The development of the Makoaneng Solar Power Plant will contribute to the objective of the area, albeit
			to a limited extent.



3.4 OTHER LEGISLATION

Other legislation mainly refers to the following:

- > Planning legislation governing the rezoning process and approval of the layout plan.
- Design standards and legislation for services provision such as water, sewerage, electricity, etc.
- Municipal bylaws related to building plans, building regulations, etc.

3.5 RELEVANT GUIDANCE

The following guidance was considered in conducting the EIA:

- ▶ The Equator principles III (2013)¹
- World Bank Group Environmental, Health and Safety General Guidelines (EHS Guidelines) (2007)
- Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution (2007)
- International Finance Corporation's Policy on Environmental and Social Sustainability (2012)
- DEA. (2013). Draft National Renewable Energy Guideline. Department of Environmental Affairs, Pretoria, South Africa
- DEA, (2012), Guideline 5 Final companion to the National Environmental Management Act (NEMA) Environmental Impact Assessment (EIA) Regulations of 2010
- DEA, (2012), Guideline 7 Public participation in the Environmental Impact Assessment process
- > DEA, (2012), Guideline 9 Need and desirability
- DEA, (2006), Guideline 3 General guide to the Environmental Impact Assessment Regulations
- DEAT, (2006), Guideline 4 Public participation in support of the Environmental Impact Assessment Regulations
- DEAT, (2006), Guideline 5 Assessment of alternatives and impacts in support of the Environmental Impact Assessment Regulations
- BirdLife, (2017). Best Practise Guidelines Birds & Solar Energy: Guidelines for assessing and monitoring the impact of solar power generating facilities on bird in southern Africa.

¹ Although this report is not written in terms of the Equator Principles (EPs), it fully acknowledges that the EPs will need to be complied with should funding for the project be required.



3.6 CONCLUSION

The EIA was undertaken in accordance with the EIA Regulations (as amended) published in GNR 326, in terms of Section 24(5) and 44 of the NEMA as amended as well as all relevant National legislation, policy documents, national guidelines, the World Bank EHS Guidelines, the IFC Performance Standards, and the Equator Principles.

The legislative and policy context plays an important role in identifying and assessing the potential social impacts associated with the proposed development, as well as an indication of the need and desirability of the proposed development from a national, provincial and local level. For this reason, the proposed development project will be assessed in terms of its fit with the key legislative, policy and planning documents discussed above.

The main findings of the review of the policy documents on all spheres of Government indicated that strong support was given towards renewable energy, specifically PV solar energy and therefore it is concluded that there is support for the development of the Makoaneng Solar Power Plant. The White Paper on the Energy Policy of the Republic of South Africa of 1998 stated that due to the fact that renewable energy resources operate from an unlimited resource base, i.e. the sun, renewable energy can increasingly contribute towards a long-term sustainable energy supply for future generations. This policy further highlights that due to the unlimited resources base of renewable energy in South Africa, renewable energy applications, like PV solar energy and associated infrastructure, are more sustainable in terms of social and environmental costs. The Integrated Resource Planning for Electricity for South Africa of 2010–2030, the National Infrastructure Plan of South Africa and the New Growth Path Framework all support the development of the renewable energy sector. In particular, the IRP also indicated that 43% of the energy generation in South Africa is allocated to renewable energy applications. On a District and Local level limited attention is given explicitly to renewable sources like PV solar energy, however the documents reviewed do make provision for such developments and efficiency in improving the quality of lives in terms of efficient physical infrastructure as well as socio-economic growth. At Provincial, District and Local level the policy documents support the applications of renewables.

The review of the relevant policies and documents related to the energy sector therefore indicate that renewables, like solar energy and the establishment of solar energy facilities and associated infrastructure, are supported on all spheres of Government. The proposed Makoaneng Solar Power Plant is therefore supported by the related policy and planning documents reviewed in this section of the report.



4 THE NEED AND DESIRABILITY

This section aims to address the following requirements of the regulations:

Appendix 2. (2) A scoping report (...) must include – (f) a motivation for the need and desirability of the activity in the context of the preferred location.

4.1 THE NEED FOR THE PROPOSED ACTIVITY

The proposed activity is a direct result of the growing demand for electricity and the need for renewable energy in South Africa. According to Eskom, the demand for electricity in South Africa has been growing at approximately 3% per annum. This growing demand, fuelled by increasing economic growth and social development, is placing increasing pressure on South Africa's existing power generation capacity. Coupled with this, is the growing awareness of environmentally responsible development, the impacts of climate change and the need for sustainable development.

Over 90% of South Africa's electricity generation is coal based, the Word bank estimates that this results in an annual, per capita carbon emission of ~8.9 tons per person. Based on 2008 fossil-fuel CO2 emissions statistics released by the Carbon Dioxide Information Analysis Centre, South Africa is the 13th largest carbon dioxide emitting country in the world and the largest emitter in Africa (Boden, et al. 2011). In August 2021 an article confirmed that South Africa is the 12th highest greenhouse gas emitter in the world (source: https://www.news24.com/fin24/economy/eskom-will-only-able-to-meet-global-air-quality-standards-by-2050-owing-to-financial-woes-20210818).

The proposed project is intended to form part of the Department of Mineral Resources and Energy's (DMREs) Renewable Energy Independent Power Producer Procurement (REIPPP) Programme or any other appropriate energy generation programmes / opportunities. The REIPPP Programme aims to secure 14 725 Megawatts (MW) of new generation capacity from renewable energy sources, while simultaneously diversifying South Africa's electricity mix. According to the 2021 State of the Nation Address, Government will soon be initiating the procurement of an additional 11 800 MW of power from renewable energy, natural gas, battery storage and coal in line with the Integrated Resource Plan 2019 and fulfilling their commitments under the United Nations Framework Convention on Climate Change and its Paris Agreement which include the reduction of greenhouse gas emissions. Eskom, the largest greenhouse gas emitter of South Africa, has committed in principle to net zero emission by 2050 and to increase its renewable capacity. During the 2022 State of the Nation Address it was indicated that during the past year the government had taken "firm steps" to bring additional generation capacity online as quickly as possible to close the shortfall in terms of electricity. As a result it was confirmed that several new generation projects will be coming online over the next few years.

Besides capacity additions, several assumptions have changed since the promulgation of IRP 2010–2030. Key assumptions that changed include the electricity demand projection, Eskom's existing plant performance, as well as new technology costs. These changes necessitated the review and update of the IRP which resulted in the draft IRP 2018 as per table 4.1 below:



	Coal	Nuclear	Hydro	Storage (Pumped Storage)	PV	Wind	CSP	Gas / Diesel	Other (CoGen, Diomass, Landfill)	Embedded Generation
2018	39 126	1 860	2 196	2 912	1 474	1 980	300	3 830	499	Unknown
2019	2 155					244	300			200
2020	1 433				114	300				200
2021	1 433				300	818				200
2022	711				400					200
2023	500									200
2024	500									200
2025					670	200				200
2026					1 000	1 500		2 250		200
2027					1 000	1 600		1 200		200
2028					1 000	1 600		1 800		200
2029					1 000	1 600		2 850		200
2030			2 500		1 000	1 600				200
TOTAL INSTALLED	33 847	1 860	4 696	2 912	7 958	11 442	600	11 930	499	2600
Installed Capacity Mix (%)	44.6	2.5	6.2	3.8	10.5	15.1	0.9	15.7	0.7	
Installed Capacity										
Committed / Already Contracted Capacity										
	New Additional Capacity (IRP Update)									

Table 4.1: Published Draft IRP 2018 (Approved by Cabinet for Consultation)

According to the South African Energy Sector Overview (2021), there is currently 1 723MW of installed PV capacity, while an additional 2 600MW from wind and solar has been rewarded as part of Bid window 5.

4.2 THE DESIRABILITY OF THE PROPOSED ACTIVITY

The facility's contribution towards sustainable development and the associated benefits to society in general is discussed below:

- Lesser dependence on fossil fuel generated power The deployment of the facility will have a positive macro-economic impact by reducing South Africa's dependence on fossil fuel generated power and assisting the country in meeting its growing electricity demand.
- Increased surety of supply By diversifying the sources of power in the country, the surety of supply will increase. The power demands of South Africa are ever increasing and by adding solar power this demand can be met, even exceeded without increasing pollution in relation to the use of fossil fuels. The project has the potential of "securing" economic activity by assisting in removing supply constraints if Eskom generation activities result in a supply shortfall. When supply is constrained, it represents a limitation to economic growth. When a supply reserve is available, it represents an opportunity for economic growth.
- Local economic growth The proposed project will contribute to local economic growth by supporting industry development in line with provincial and regional goals and ensuring advanced skills are drawn to the Free State Province. The project will likely encounter widespread support from government, civil society and businesses, all of whom see potential opportunities for revenues, employment and business opportunities locally. The development of the photovoltaic solar facility will in turn lead to growth in tax revenues for local municipalities and sales of carbon credits, resulting in increased foreign direct investment. The location of the proposed



development within the Masilonyana Local Municipality is desirable since 48,4% of households within the Municipality live within the poverty level with an income of less than R38 200 per annum. (Masilonyana IDP, 2020/2021).

- Lower costs of alternative energy An increase in the number of solar facilities commissioned will eventually reduce the cost of the power generated through solar facilities. This will contribute to the country's objective of utilising more renewable energy and less fossil fuel-based power sources. It will assist in achieving the goal to generate 14 725 MW of electricity from renewable energy as per the Renewable Energy Independent Power Producer Procurement (REIPPP) Programme of the Department of Mineral Resources and Energy. The Government will be initiating the procurement of an additional 11 800 MW of renewable energy as stated during the 2021 State of the Nation Address.
- <u>Reduction in greenhouse gas emissions</u> The additional power supplied through solar energy will reduce the reliance on the combustion of fossil fuels to produce power. The South African electricity grid is predominantly coal-fired and therefore GHG emissions intensive (coal accounts for more than 92% of the fuel used in South Africa's electricity generation). The reduction of GHG emissions as a result of the project implementation will be achieved due to reduction of CO₂ emissions from combustion of fossil fuel at the existing grid-connected power plants and plants which would likely be built in the absence of the project activity.
- <u>CDM Project</u> A solar energy facility also qualifies as a Clean Development Mechanism (CDM) project (i.e. a financial mechanism developed to encourage the development of renewable technologies).
- <u>Climate change mitigation</u> On a global scale, the project makes a contribution to greenhouse gas emission reduction and therefore contributes toward climate change mitigation.
- <u>Reduced environmental impacts</u> The reduction in non-renewable electricity consumed from the grid will not only result in a reduction in greenhouse gas emissions, but also the prevention of negative impacts associated with coal mining. For example, coal power requires high volumes of water, in areas of South Africa where water supply is already over-stretched and water availability is highly variable. Photovoltaic solar energy technology also does not produce the sulphur emissions, ash or coal mining concerns associated with conventional coal fired electricity generation technologies resulting in a relatively low level of environmental impacts. It is a clean technology which contributes toward a better-quality environment for employees and nearby communities.
- <u>Social benefits</u> The project activity is likely to have significant long-term, indirect positive social impacts that may extend to a regional and even national scale. The larger scale impacts are to be derived in the utilization of solar power and the experience gained through the construction and operation of the power plant. In future, this experience can be employed at other similar solar installations in South Africa.
- <u>Provision of job opportunities</u> The main benefit of the proposed development operating in the area is that local companies or contractors will be hired for the duration of the construction period. The operational phase will provide permanent job opportunities to the local communities from the surrounding area since security



guards and general labourers will be required on a full-time basis. Approximately 800 employment opportunities will be created during the construction and operational phases.

- <u>Indirect socio-economic benefits</u> The increase in the demand for services such as accommodation, transportation, security, general maintenance and catering will generate additional indirect socio-economic benefits for the local community members.
- <u>Effective use of resources</u> Because of predominantly the climate and soil limitations, the site is totally unsuitable for cultivated crops, and the viable agricultural land use is limited to grazing only. The proposed development in this specific area will generate alternative land use income through rental for the proposed energy facility, which will have a positive impact on agriculture. It will provide the farming enterprise with increased cash flow and rural livelihood, and thereby improve the financial sustainability of agricultural activities.
- <u>Increased access to electricity</u>: According to the Masilonyana LM IDP, the national electricity crises of 2010 and the resultant effects on South African residents and the economy has highlighted how highly reliant we are on electricity as a source of energy. Government has committed to developing measures to promote energy saving, reduce energy costs to the economy, and reduce the negative impact of energy use on the environment.
- <u>Cumulative impacts of low to medium significance</u> No cumulative impacts with a high residual risk have been identified. In terms of the desirability of the development of sources of renewable energy therefore, it may be preferable to incur a higher cumulative loss in such a region as this one, than to lose land with a higher environmental value elsewhere in the country.



5 DESCRIPTION OF ENVIRONMENTAL ISSUES

This section aims to address the following requirements of the regulations:

Appendix 2. (2) A scoping report (...) must include-

(h) a full description of the process followed to reach the proposed preferred activity, site and location of the development footprint within the site, including –

(i) details of all the alternatives considered;

(ii) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;

(iii) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them.

(iv) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;

(ix) the outcome of the site selection matrix;

(x) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such and

(xi) a concluding statement indicating the preferred alternatives, including preferred location of the activity;

5.1 CONSIDERATION OF ALTERNATIVES

The DEAT 2006 guidelines on 'assessment of alternatives and impacts' proposes the consideration of four types of alternatives namely, the no-go, location, activity, and design alternatives. It is, however, important to note that the regulation and guidelines specifically state that only 'feasible' and 'reasonable' alternatives should be explored. It also recognizes that the consideration of alternatives is an iterative process of feedback between the developer and EAP, which in some instances culminates in a single preferred project proposal.

An initial site assessment (refer to Appendix D) was conducted by the developer on on the Farm Nakob No. 750, Portion 1 of the farm Avondzon No. 278, Remaining Extent of the farm Selborne No. 392, Farm Buxton No. 581 and the Farm Goedehoop No. 251 was found favorable due to its close proximity to grid connections, solar radiation, ecology and relative flat terrain. Some parts of the farm have been deemed not suitable for the proposed development such as areas under cultivation. Where specific features of environmental sensitivity are identified by the independent specialists as part of the Scoping Phase, these areas and the associated required buffers will be considered by the developer to ensure that the facility layout is appropriate considering the sensitive features present. The site selection also took the site geology, land capability, water availability and land use into consideration before deciding on the specific site within the affected property. A single alternative site on the same farm has been identified (Subsolar, 2022).

The following sections explore different types of alternatives in relation to the proposed activity in more detail.



5.1.1 No-go alternative

This alternative considers the option of 'do nothing' and maintaining the status quo of the affected environment. The description provided in section 5.3 of this report could be considered the baseline conditions (*status quo*) to persist should the no-go alternative be preferred. The site is currently zoned for agricultural and mining land uses. Should the proposed activity not proceed, the site will remain unchanged and will continue to be used for the current land uses present. The area associated with the development footprint has limited agricultural potential and is unsuitable for cultivation, with grazing considered to be the only agricultural option. The potential opportunity costs in terms of alternative land use income through rental for the energy facility and the supporting social and economic development in the area would be lost if the *status quo* persists.

5.1.2 Location alternatives

This alternative asks the question, if there is not, from an environmental perspective, a more suitable location for the proposed activity. No other properties have at this stage been secured by Makoaneng Solar Power Plant (RF) (Pty) Ltd in the Bloemfontein area to potentially establish the Makoaneng Solar Power Plant. From a local perspective the Farm Nakob No. 750, Portion 1 of the farm Avondzon No. 278, Remaining Extent of the farm Selborne No. 392, Farm Buxton No. 581 and the Farm Goedehoop No. 251, situated within the Masilonyana Local Municipality area of jurisdiction is preferred due to its suitable climatic conditions, topography (i.e. in terms of slope), environmental conditions (i.e. agricultural potential and archaeology), proximity to a grid connection point (i.e. for the purpose of electricity evacuation), as well as site access (i.e. to facilitate the movement of machinery, equipment, infrastructure and people during the construction phase).

No alternative areas on on the Farm Nakob No. 750, Portion 1 of the farm Avondzon No. 278, Remaining Extent of the farm Selborne No. 392, Farm Buxton No. 581 and the Farm Goedehoop No. 251 have been considered for the development footprint. However, provision will be made in this scoping report to consider the results of the specialist studies to exclude the sensitive areas present, which includes the no-go buffer areas recommended by the specialist. The sensitive areas and associated buffers will be considered by the developer for the facility layout design to optimise the layout for avoidance of the environmental sensitivities identified.

As part of the specialist studies undertaken, areas that will need to be avoided has been identified which includes drainage channels and other surface water/wetland features present within the development footprint. The development footprint is however large enough to enable the avoidance of the sensitive features and the associated buffers by the facility layout and still provide an opportunity for the successful development and operation of the Makoaneng Solar Power Plant from a technical perspective.

Therefore, a single preferred location alternative was assessed – refer to Figures 5.1.



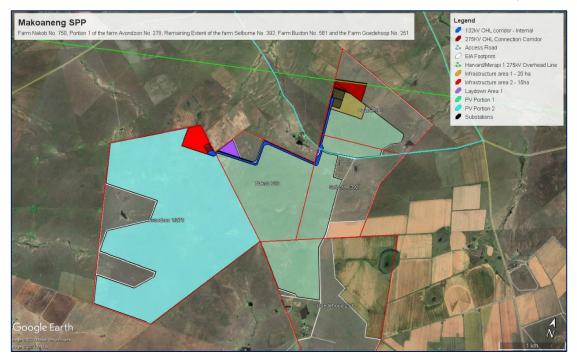


Figure 5.1: Location of the single preferred location alternative (i.e. development footprint) located within the affected property assessed

5.1.3 Activity alternatives

The scoping process also needs to consider if the development of a solar PV facility would be the most appropriate land use for the particular site.

- <u>Photovoltaic (PV) solar facility</u> Makoaneng Solar Power Plant (RF) (Pty) Ltd is part of a portfolio of solar PV projects throughout South Africa. The Makoaneng Solar Power Plant can be recycled.
- <u>Wind energy facility</u> Due to the local climatic conditions a wind energy facility is not considered suitable as the area does not have the required wind resource. Furthermore, the applicant has opted for the generation of electricity via solar power rather than the use of wind turbines based on the renewable energy resource available for the area. This alternative is therefore regarded as not feasible and will not be evaluated further in this report.
- <u>Concentrated solar power (CSP) technology</u> CSP technology requires large volumes
 of water, and this is a major constraint for this type of technology considering the
 water challenges and limitation experienced not only in the country but also the local
 area. While the irradiation values are high enough to generate sufficient solar power,
 the water constraints render this alternative not feasible. It must also be noted that
 the IRP no longer includes the use of CSP as part of the energy mix of the county.
 Therefore, this alternative will not be considered further in this report.



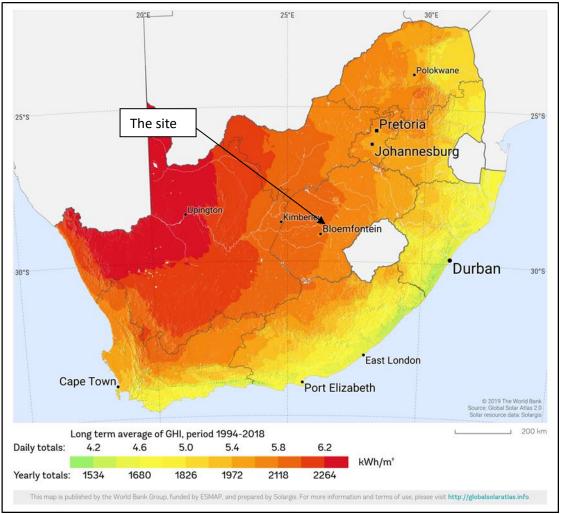


Figure 5.2: Global horizontal irradiation values for South Africa (Solar GIS, 2021) and the Makoaneng Solar Power Plant development footprint.

5.1.4 Technical alternatives

Possible technical alternatives for the development of a solar PV facility needs to be considered during the EIA process.

5.1.4.1 Distribution lines

Connecting the array to the electrical grid requires transformation of the voltage from 480V to 33kV to 132kV. The normal components and dimensions of a distribution rated electrical substation will be required. Output voltage from the inverter is approximately 480V and this is fed into step up transformers to 132kV. An onsite facility substation and switching stations will be required on the site to step the voltage up to 132kV, after which the power will be evacuated into the national grid via the proposed power line. Generation from the facility will tie in with the existing Eskom Harvard/Merapi 1 275/22kV Existing Line. The connection power line will be constructed within the limits of the grid connection corridor. Two infrastructure and ancillary complex 1 (IAC1) and infrastructure and ancillary complex 2 (IAC2). The facility substations will be constructed within the Infrastructure and Ancillary Complexes. IAC 2 will be connected to IAC 1 via an internal connection, from where the generated electricity will be evacuated to the national grid via the National Grid Connection corridors must be assessed for



the placement of the power line. The two infrastructure and ancillary complexes (IAC) that are proposed for the facility must be fully assessed for the placement of a substation and BESS.

For the placement of the new power line one grid connection corridor is being assessed with a length of up to 6km and 100m and up to 480m in width. All three connection points are located with the corridor.

A 132kV overhead distribution line is the only preferred alternative for the applicant due to the following reasons:

• <u>Overhead Distribution Lines</u> - Overhead lines are less costly to construct than underground lines. Therefore, the preference for overhead lines is mainly based on cost. Overhead lines allow high voltage operations, and the surrounding air provides the necessary electrical insulation to earth. Further, the surrounding air cools the conductors that produce heat due to lost energy (Swingler *et al.*, 2006).

The overall weather conditions in the Free State Province are unlikely to cause damage and faults on the proposed overhead distribution power line. Nonetheless, if a fault occurs, it can be found quickly by visual means using a manual line patrol. Repair to overhead lines is relatively simple in most cases and the line can usually be put back into service within a few days. In terms of potential impacts associated with overhead distribution lines these include visual intrusion and threats to sensitive habitat (where applicable).

Furthermore, overhead power lines also provide an opportunity for the avoidance of sensitive environmental features as the overhead lines can span on-ground environmental features to ensure conservation, therefore providing more flexibility in terms of mitigation of the associated on-ground disturbance.

The choice of structure to be used for the power line will be determined in consultation with Eskom once the Engineers have assessed the geotechnical and topographical conditions and decided on a suitable structure which meets the prescribed technical requirements. The choice of structures to be used will not have any adverse impacts on the environment. The line will be constructed according to the authorised standards for a power line approved by Eskom Holdings SoC Ltd.

The following alternatives may be considered for the overhead power line:

• Single Circuit Overhead Power Line

The use of single circuit overhead power lines to distribute electricity is considered the most appropriate technology and has been designed over many years for the existing environmental conditions and terrain as specified in the Eskom Specifications and best international practice. Based on all current technologies available, single circuit overhead power lines are considered the most environmentally practicable technology available for the distribution of power. This option is considered appropriate for the following reasons:

- More cost-effective installation costs;
- Less environmental damage during installation; and
- More effective and cheaper maintenance costs over the lifetime of the power line.
- Double Circuit Overhead Power Line



Where sensitive environmental features are identified, and there is sufficient justification, Eskom will consider the use of double circuit (placing 2 power lines on either side of the same tower structure) to minimise impacts. However, the use of double-circuiting has a number of technical disadvantages, which includes faults or problems on one power line may mean that the other power line is also disabled during maintenance, and this will affect the quality of supply to an area. Larger and taller towers as well as more towers are required for double-circuit power lines.

The double-circuit overhead power line proves more feasible since the single circuit may not have the capacity to transmit the large amount of electricity generated from the plant and during maintenance the entire plant would not have to be offline as one of the double circuit lines would still be able to supply electricity. However, due to the rapid requirement changes, this will only be determined before construction.

 <u>Underground Distribution Lines</u> - Underground cables have generally been used where it is impossible to use overhead lines (for example due to space constraints). Underground cables are oil cooled and are also at risk of groundwater contamination. Maintenance is also difficult on underground lines compared to overhead lines. When a fault occurs in an underground cable circuit, it is almost exclusively a permanent fault due to poor visibility. Underground lines are also more expensive to construct than overhead lines.

5.1.4.2 Battery Energy Storage Facility (BESS)

It is proposed that a Battery Energy Storage Facility for grid storage would be housed in stacked containers, or multi-storey building, with a maximum height of 8m and a maximum volume of 1,740m³ of batteries and associated operational, safety and control infrastructure. Three types of battery technologies are being considered for the proposed project: Lithium-ion, Sodium-sulphur or Vanadium Redox flow battery. While there are various battery storage technologies available, the preferred alternative is the utility-scale Lithium-ion (Li-ion) battery energy storage. Li-ion batteries have emerged as the leading technology in utility-scale energy storage applications because it offers the best mix of performance specifications, such as high charge and discharge efficiency, low self-discharge, high energy density, and long cycle life (Divya KC *et al.*, 2009).

Battery storage offers a wide range of advantages to South Africa including renewable energy time shift, renewable capacity firming, electricity supply reliability and quality improvement, voltage regulation, electricity reserve capacity improvement, transmission congestion relief, load following and time of use energy cost management. In essence, this technology allows renewable energy to enter the base load and peak power generation market and therefore can compete directly with fossil fuel sources of power generation and offer a truly sustainable electricity supply option.

5.1.5 Design and layout alternatives

Design alternatives were considered throughout the planning and design phase (i.e. what would be the best design option for the development?). In this regard discussions on the design were held between the EAP and the developer, which also included the consideration of sensitive environmental areas and features present as identified by the independent specialists that needs to be avoided by the placement of infrastructure. The draft layout plan is included as Appendix H but it should be noted that the final layout plan will be submitted as part of the EIA Report.



The draft layout follows the limitations of the site and aspects such as environmental sensitive areas (supported by specialist input), areas under cultivation, roads, fencing and servitudes are considered. The total surface area proposed for layout options include the PV panel arrays spaced to avoid shadowing, access and maintenance roads and associated infrastructure (buildings, power inverters, power lines, BESS and perimeter fences). With regards to the structure orientation, the panels will either be fixed to a single-axis horizontal tracking structure where the orientation of the panel varies according to the time of the day, as the sun moves from east to west or tilted at a fixed angle equivalent to the latitude at which the site is located in order to capture the most sun.

The choice of pylon structure to be used for the power line will be determined in consultation with Eskom and does not significantly affect the environmental impacts of the proposed development as provision has already been made for the visual, ecological and heritage impacts of erecting a power line. No defined structure has been confirmed at this stage and will depend on Eskom's technical requirements. The 132kV line must be constructed according to the authorised standards for a power line approved by Eskom Holdings SoC Ltd. The structure to be utilised for the power line towers will also be informed by the local geotechnical and topographical conditions. The following alternatives are considered with regards to the proposed structures:

Steel lattice towers:

The steel lattice towers provide the following advantages over the other tower types available:

- Enables multipath earthing which enhances the overall electrical performance of the power line.
- Is visually less obtrusive than the mono-pole options.
- Is more practicable that other options i.e. more cost effective and more practical to construct and maintain.
- Is safer to work on than the monopole and wood pole structures.
- Is more durable than the wood pole structures.

Steel monopoles:

The steel monopole is considered less suitable than the steel lattice towers for the following reasons:

- Is visually more intrusive than the lattice towers.
- Is more expensive than the lattice towers.
- Requires more steel than the lattice towers.
- Is more difficult to erect.
- Is not as safe to work on as the lattice towers.

Wood poles:

Wood pole structures are only used in extreme circumstances where a visual impact needs to be avoided. Wood pole structures may be cheaper to produce and to construct, but they have one tenth of the lifespan of the metal counterparts and are far more susceptible to weather conditions which makes them less efficient and practicable. The wood pole structure is also



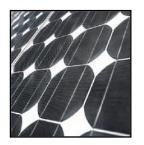
more susceptible to having the cross arms burnt off by electrical faults as well as being susceptible to deformation with height.

5.1.6 Technology alternatives

There are several types of semiconductor technologies currently available and in use for PV solar panels. Two, however, have become the most widely adopted, namely crystalline silicon and thin film. These technologies are discussed in more detail below:

• <u>Crystalline (high efficiency technology at higher cost):</u>

Crystalline silicon panels are constructed by first putting a single slice of silicon through a series of processing steps, creating one solar cell. These cells are then assembled together in multiples to make a solar panel. Crystalline silicon, also called wafer silicon, is the oldest and the most widely used material in commercial solar panels. Crystalline silicon modules represent 85-90% of the global annual market today. There are two main types of crystalline silicon panels that can be considered for the solar facility:





- Mono-crystalline Silicon mono-crystalline (also called single crystal) panels use solar cells that are cut from a piece of silicon grown from a single, uniform crystal. Mono-crystalline panels are among the most efficient yet most expensive on the market. They require the highest purity silicon and have the most involved manufacturing process.
- Poly-crystalline Silicon poly-crystalline panels use solar cells that are cut from multifaceted silicon crystals. They are less uniform in appearance than mono-crystalline cells, resembling pieces of shattered glass. These are the most common solar panels on the market, being less expensive than mono-crystalline silicon. They are also less efficient, though the performance gap has begun to close in recent years (First Solar, 2011).
- Thin film (low-cost technology with lower efficiency):

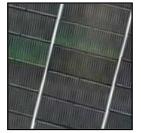
Thin film solar panels are made by placing thin layers of semiconductor material onto various surfaces, usually on glass. The term *thin film* refers to the amount of semiconductor material used. It is applied in a thin film to a surface structure, such as a sheet of glass. Contrary to popular belief, most thin film panels are not flexible. Overall, thin film solar panels offer the lowest manufacturing costs, and are becoming more prevalent in the industry. Thin films currently account for 10-15% of global PV module sales. There are three main types of thin film used:







- Cadmium Telluride (CdTe) CdTe is a semiconductor compound formed from cadmium and tellurium. CdTe solar panels are manufactured on glass. They are the most common type of thin film solar panel on the market and the most cost-effective to manufacture. CdTe panels perform significantly better in high temperatures and in low-light conditions.
- Amorphous Silicon Amorphous silicon is the noncrystalline form of silicon and was the first thin film material to yield a commercial product, first used in consumer items such as calculators. It can be deposited in thin layers onto a variety of surfaces and offers lower costs than traditional crystalline silicon, though it is less efficient at converting sunlight into electricity.



- Copper, Indium, Gallium, Selenide (CIGS) CIGS is a compound semiconductor that can be deposited onto many different materials. CIGS has only recently become available for small commercial applications, and is considered a developing PV technology (First Solar, 2011).
- Bifacial panels:

As the name suggests, bifacial solar panels have two faces, or rather, they can absorb light from both sides of the panel. A lot of potential energy transfer is lost in traditional solar cells when the light hits the back of a solar panel. Most bifacial solar panels use monocrystalline cells, whereas traditional cells use polycrystalline materials. The monocrystalline materials, alongside the clear light pathway on both sides of the panel, enable the light to be absorbed from either side of the cell, and it is thought that the overall efficiency of these cells can be up to 30% greater in commercial applications. Although, the exact amount is variable depending on the surface that they are installed on. The front side of the solar panel still absorbs most of the solar light, but the back side of the solar panel can absorb between 5-90% of the light absorbed by the front of the solar panel. Refer to Figure 5.5.

Traditional solar panels use an opaque back sheet. By comparison, bifacial solar panels either have a clear/reflective back sheet or have dual panes of glass. Most of these solar panels are frameless so any issues with potential-induced degradation (PID) are reduced. To efficiently convert light into electricity from both sides, bifacial solar cells have selective-area metallization schemes that enable light to pass between the metallized areas, rather than the conventional thick metal collectors as seen with monofacial solar panels.

The technology that (at this stage) proves to be most feasible and reasonable with respect to the proposed solar facility is crystalline silicon panels, due to it being non-reflective, more efficient, and with a higher durability. However, due to the rapid technological advances being made in the field of solar technology the exact type of technology to be used, such as bifacial panels, will only be confirmed at the onset of the project.



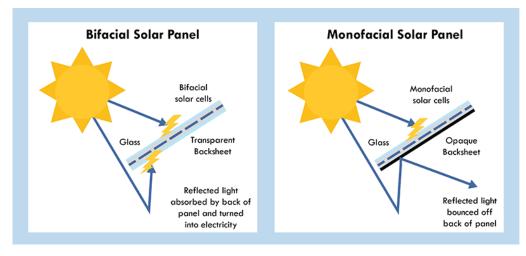


Figure 5.3: Bifacial vs Monoficial Solar Panel absorption.

5.2 PUBLIC PARTICIPATION PROCESS

The following sections provide detailed information on the public participation process conducted in terms of Regulations 39 to 44.

5.2.1 General

The public participation process was conducted strictly in accordance with Regulations 39 to 44. The following three categories of variables were taken into account when deciding the required level of public participation:

- The scale of anticipated impacts;
- The sensitivity of the affected environment and the degree of controversy of the project; and
- The characteristics of the potentially affected parties.

Since the scale of anticipated impacts is low, the general land use of the area is related to mining and agriculture, the limited environmental sensitivity of the site and the fact that no conflict was foreseen between potentially affected parties, no additional public participation mechanisms are considered at this stage of the process. The following actions have already been taken in line with the approved public participation plan (refer to Appendix C1):

Newspaper advertisement

Since the proposed development is unlikely to result in any impacts that extend beyond the municipal area where it is located, it was deemed sufficient to advertise in a local newspaper. An advertisement was placed in English in the local newspaper (Vista Newspaper) on the 16 February 2023 (see Appendix C2) notifying the public of the EIA process and requesting Interested and Affected Parties (I&APs) to register with and submit their comments to Environamics Environmental Consultants. I&APs were given the opportunity to raise comments within 30 days of the advertisement.

Site notices

Site notices were placed on site in Afrikaans and English on 28 February 2023 to inform surrounding communities and immediately adjacent landowners of the proposed



development. I&APs were given the opportunity to raise comments by 29 August2022. Photographic evidence of the site notices is included in Appendix C3.

Direct notification of identified I&APs

Identified I&APs, including key stakeholders representing various sectors, has been directly informed of the EIA process on 17 March 2023 via registered post, telephone calls, WhatsApps and emails (as relevant). The Background Information Document (BID) was distributed with the notification. For a complete list of I&APs with their contact details see Appendix C4 to this report. To date comments have been received from various parties that have an interest in the development (Appendix C5 – C7).

> Direct notification of surrounding landowners and occupiers

Written notices were also provided via registered post, WhatsApp or email (as relevant) to all surrounding landowners and occupiers on 17 March 2023. The surrounding landowners were given the opportunity to raise comments within 30 days. For a list of surrounding landowners see Appendix C4. The surrounding landowners were given the opportunity to raise comments have been received from various parties that have an interest in the development (Appendix C5 – C7). Refer to Figure 5.6.

<u>Circulation of Draft Scoping Report</u>

Copies of the draft Scoping report has been provided to all I&APs via courier, Dropbox and/or email (as relevant). Hard copies of the report will be made available on request and where an I&AP does not have the resources to view the report on an online platform. All issues identified during the 30-day review and comment period will be recorded and documented and compiled into a Comments and Response Report to be included as part of the Final Scoping Report for decision-making.

5.2.2 Consultation process

Regulation 41 requires that the landowner, surrounding landowners, municipality, relevant ward councillor, any organ of state having jurisdiction in respect of any aspect of the activity should be given written notice of the activity. A complete list of all the consultees who received written notice as well as proof of correspondence is attached as Appendices C4 and C5.



5.2.3 Registered I&APs

I&APs include all stakeholders who deem themselves affected by the proposed activity. According to Regulation 43(1) "A registered interested and affected party is entitled to comment, in writing, on all reports or plans submitted to such party during the public participation process contemplated in these Regulations and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application, provided that the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application."

This report is the Draft Scoping Report which has been made available to all potential and/or registered I&APs and State Departments. They have been provided with a copy of the Draft Scoping Report and have been requested to provide written comments on the report within 30 days. All issues identified during this review period will be documented and compiled into a Comments and Response Report to be included as part of the Final Scoping report.

All comments received prior to the release of the Draft Scoping Report for the 30-day review and comment period have been included in this report as Appendix C5, Appendix C6 and Appendix C7 to provide I&APs an opportunity to confirm that their comments raised during the initial public participation phase has been included and considered as part of the EIA process.

5.2.4 Issues raised by I&APs and consultation bodies

To date the interim comment from SAHRA has been received and is summarised in the Comments and Response Report included in Appendix C7.

Any comments received during the circulation of the draft Scoping Report will be summarised in the final Scoping Report. The full wording and original correspondence are included in Appendix C6.

5.3 THE ENVIRONMENTAL ATTRIBUTES ASSOCIATED WITH THE PREFERRED ALTERNATIVE

The following sections provide general information on the biophysical and socio-economic attributed associated with the preferred alternative (i.e. the location of the development footprint within the affected property).

5.3.1 Biophysical environment

The biophysical environment is described with specific reference to geology, soils, agricultural potential, vegetation and landscape features, climate, biodiversity, heritage features (in terms of archaeology and palaeontology), the visual landscape and the social environment to be affected. A number of specialists were consulted to assist with the compilation of this chapter of the report – refer to the Table 1.2.

However, due to the fact that the area proposed for development (i.e. the development footprint) exclusively consists of land used for grazing and excludes the areas under cultivation, limited sensitive areas from an ecological, heritage or conservation point have been identified. These include the two wetland features consisting of a hillslope seep wetland and a valleybottom wetland. These features are described in more detail below.



5.3.1.1 Geology, soils and agricultural potential

According to the Soil and Agriculture Assessment (attached in Appendix E5), the land type database (Land Type Survey Staff, 1972 - 2006), the project site is characterised by the Bd 20 and Dc 8 land types. The Bd 20 land type is commonly dominated with Clovelly, Hutton and Valsrivier soil forms according to the Soil classification working group, (1991), with other associated soil forms and rocky areas also occur in the terrains within the terrain. The Dc 8 land type is characterised with Valsrivier, Rensburg, Oakleaf and Dundee soil forms with other associated soil forms and streambed areas also occur in the terrains. The Bd land types are characterised by plinthic catena with upland duplex and margalitic soils being rare within the terrain. The terrains are characterised by eutrophic soil base status. In the Bd land types, red soils are not widespread. The Dc land types mostly Prismacutanic and or pedocutanic diagnostic horizons being dominant. Also, vertic, melanic and red structured diagnostic horizons can occur in the terrain.

Agricultural Potential

Agricultural potential is determined by a combination of soil, terrain and climate features. Land capability classes reflect the most intensive long-term use of land under rain-fed conditions. The land capability is determined by the physical features of the landscape including the soils present. The land potential or agricultural potential is determined by combining the land capability results and the climate capability for the region.

Climate Capability

The climatic capability has been determined by means of the Smith (2006) methodology, of which the first step includes determining the climate capability of the region by means of the Mean Annual Precipitation (MAP) and annual Class A pan (potential evaporation). The climatic capability has been determined to be "C8" for the project site, where the limitation rating is Very Severe. Therefore, the project site has a very severely restricted choice of crops due to heat and moisture stress. Suitable crops at high risk of yield loss.

The land capability sensitivity (DAFF, 2017) indicates a range of sensitivities expected throughout the project site, which is predominantly covers "Moderately Low" to "Moderate" sensitivities. Smaller patches are characterised by sensitivities with "Moderately High" (Figure 6 2). Furthermore, various crop field boundaries were identified by means of the DFFE Screening Tool (2022), which are predominantly characterised by "High" sensitivities (see Figure 6 3). It is the specialist's recommendation that such high potential crop fields be avoided for the project. The Makoaneng PV solar project and Grid connection powerlines infrastructure can be rearranged around the "High" crop fields to preserve them where possible. It is the specialist's recommendation that the proposed Makoaneng Solar PV project and associate infrastructure be favourably considered as planned for the project activities.

5.3.1.2 Vegetation and, topography and landscape features

According to the Terrestrial Biodiversity Assessment (Appendix E1), This site assessment was undertaken in April 2023, which constitutes a wet-season survey. The different habitat types within the PAOI were delineated and identified based on observations during the field assessment, and available satellite imagery. These habitat types were assigned Ecological Importance (EI) categories based on their ecological integrity, conservation value, the presence of species of conservation concern and their ecosystem processes.



Seven (7) different terrestrial habitat types were delineated within the PAO. Based on the sensitivity criteria, all habitats within the PAOI were allocated a sensitivity category. The Site Sensitivity Verification confirms the very high terrestrial biodiversity theme sensitivity as indicated in the Screening Tool. The Bloemfontein Karroid Shrubland was allocated a very high sensitivity. The Windburg Grassy Shrubland, Ephemeral Pans and Drainage Areas have a high sensitivity rating. The Central Free State Grasslands had a medium sensitivity rating, while the Old Lands and Degraded Areas all received a low sensitivity rating.

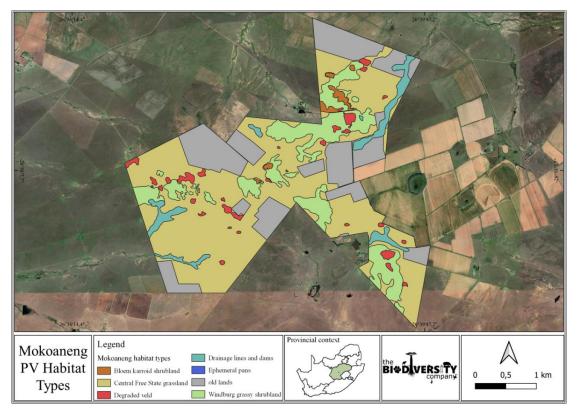


Figure 5.4: Map illustrating the preliminary Terrestrial Site habitat types of the Project Area of Influence (PAOI)

Habitat Assessment:

The habitat sensitivity of the Bloem Karroid Shrubland is regarded as very high. The Windburg Grassy Shrubland, Ephemeral pans and drainage areas are regarded as high. The Central Free State Grassland is regarded as medium. The Old Lands and Degraded Areas are regarded as low.

The Bloem Karroid Shrubland is regarded as very high because of the abundance of the threatened species *Lithops lesliei* and the fact that the habitat was in a pristine ecological condition. The endangered antelope species *Redunca fulvorufula* (Mountain reedbuck) was also seen foraging in this habitat type. The grassland vegetation of the area supports a diverse array of organisms including red listed species and plays an important role in the ecosystem.

It is the specialist's opinion that the proposed developability of the PAOI is as follows:

• <u>Avoidance</u>: No development activities should be considered for Very High SEI habitat units. An associated 200 m buffer should also be incorporated into the development planning.



- <u>Avoidance</u> (Very High SEI): No destructive development activities should be considered for Very High SEI habitat units. Avoidance is also recommended for the delineated area and accompanying buffers.
- <u>Avoidance and Minimisation (High SEI Areas</u>): Any development in these areas will lead to the direct destruction and loss of portions of functional habitat. Guidelines for development in high sensitivity.

Declared Invasive Alien Species

Invasive Alien Plants (IAPs) tend to dominate or replace indigenous flora, thereby transforming the structure, composition and functioning of ecosystems. Therefore, it is important that these plants are controlled by means of an eradication and monitoring programme. Some invader plants may also degrade ecosystems through superior competitive capabilities to exclude native plant species.

NEMBA is the most recent legislation pertaining to alien invasive plant species. In August 2014, the list of Alien Invasive Species was published in terms of the NEMBA. The Alien and Invasive Species Regulations were published in the Government Gazette No. 44182, 24th of February 2021. The legislation calls for the removal and / or control of IAP species (Category 1 species). In addition, unless authorised thereto in terms of the NWA, no land user shall allow Category 2 plants to occur within 30 meters of the 1:50 year flood line of a river, stream, spring, natural channel in which water flows regularly or intermittently, lake, dam or wetland. Category 3 plants are also prohibited from occurring within proximity to a watercourse. Below is a brief explanation of the three categories in terms of the NEMBA:

- Category 1a: Invasive species requiring compulsory control. Remove and destroy. Any specimens of Category 1a listed species need, by law, to be eradicated from the environment. No permits will be issued.
- Category 1b: Invasive species requiring compulsory control as part of an invasive species control programme. Remove and destroy. These plants are deemed to have such a high invasive potential that infestations can qualify to be placed under a government sponsored invasive species management programme. No permits will be issued.
- Category 2: Invasive species regulated by area. A demarcation permit is required to import, possess, grow, breed, move, sell, buy or accept as a gift any plants listed as Category 2 plants. No permits will be issued for Category 2 plants to exist in riparian zones.
- Category 3: Invasive species regulated by activity. An individual plant permit is required to undertake any of the following restricted activities (import, possess, grow, breed, move, sell, buy or accept as a gift) involving a Category 3 species. No permits will be issued for Category 3 plants to exist in riparian zones.

5.3.1.3 Wetlands and Riparian Features

According to the Wetland Baseline and Risk Assessment Report (Appendix E1), The different wetland types within the PAOI were identified and delineated during the field assessment in accordance with the Department of Human Settlements, Water and Sanitation guidelines and recommend suitable buffer zones (DWA, 2008), and available satellite imagery. Nine (9) HGM unit was identified within the project area of influence, namely, six unchannelled valley-



bottom wetland, two Depression wetlands, and a single seep wetland, along with multiple drainage lines and a few farm dams. The different wetland types within the Project Area of Interest were assessed, delineated and identified based on observations during the site assessment, these wetland types were assigned an overall PES (Present Ecological Status) of Moderate to Seriously modified and the IS (Importance and Sensitivity) of Low/marginal to Moderate.

These systems differ from one another regarding ecological importance and sensitivity. The dominant land use within the proposed area is natural grassland for grazing followed by builtup environment and is surrounded by maize farming. Many of the wetlands have been altered significantly through grazing and compaction from driving within the wetlands. Examples of these impacts recorded on site are:

- Cattle farming has resulted in significant overgrazing; and
- Wetlands are also impacted on by roads, which have resulted in some fragmentation of the natural systems, compaction of soils in some places, loss of vegetation and the formation of preferential flow paths.

HGM	Present Ecological Status (PES)	Importance and Sensitivity (IS)	Recommended Ecological Category (REC)	Buffer Requirements		
HGM 1	E- Seriously modified, with the loss of natural habitats	Moderate	D- Largely Modified	15 m		
HGM 2	C- Moderately modified, but with some loss of natural habitats	Moderate	C - Moderate	15 m		
HGM 3	D - Largely modified, with the loss of natural habitats	Moderate	C - Moderate	15 m		
HGM 4	C- Moderately modified, but with some loss of natural habitats	Moderate	C - Moderate	15 m		
HGM 5	D - Largely modified, with the loss of natural habitats	Moderate	C - Moderate	15 m		
HGM 6	D - Largely modified, with the loss of natural habitats	Moderate	C - Moderate	15 m		
HGM 7	C- Moderately modified, but with some loss of natural habitats	Moderate	C - Moderate	15 m		
HGM 8	C- Moderately modified, but with some loss of natural habitats	Moderate	C - Moderate	15 m		
HGM 9	D - Largely modified, with the loss of natural habitats	Moderate	C - Moderate	15 m		

Table 5.1: Wetland System Characterisation

During the construction phase, vegetation clearance may lead to direct wetland habitat fragmentation and loss. Further impacts associated with vegetation clearance are increased erosion, sedimentation, and increased water runoff. The operation of construction machinery on site will generate noise and cause dust pollution, which may lead to increased sediment input. Construction machinery may result in hydrocarbon (oil/diesel/petrol spills) contamination of soil and water.

A few aspects are associated with the operational phase which may potentially have negative impacts on the wetland habitats. Amongst others, the main aspects would be surface



hardening and herbicide use. Surface hardening would result from compaction as a result of machinery movement and a panel stand stabilization. This aspect would result in impacts such as increased stormwater runoff, loss of suitable substrate, and decreased vegetation reestablishment. Herbicide use for the control of vegetation between and beneath panels may result in contamination of the wetland during a surface runoff event, or via soil interflow into the wetlands. Contamination may also develop as a result of chemicals used for cleaning the panels (see Figure 5.5).

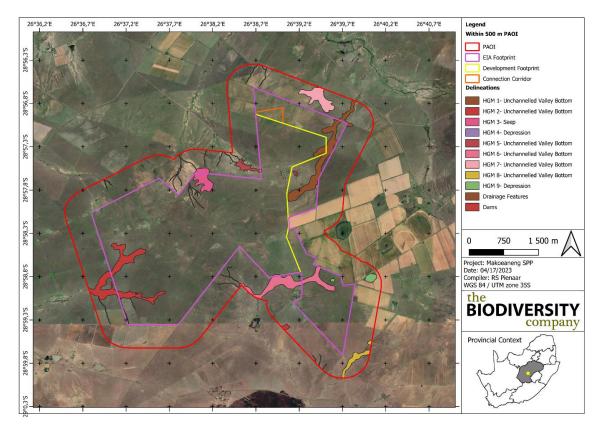


Figure 5.5: Map illustrating the Delineation of wetlands and associated scientific buffers

The wetland delineation conducted within the Project Area of Interest was done in accordance with the criteria established by the Department of Water Affairs and Forestry (2003) and the South African National Wetland Classification System (SANBI, 2009). Soils, vegetation associated with wetlands, and topography all served as characteristics in determining wetland zones. The wetland types within the Project area of interest area are 6 unchannelled valley bottoms, a Seep wetland, and two depression wetlands.

During the site assessment, nine (9) HGM unit was identified within the PAOI, namely, six unchannelled valley bottoms, a single wetland seep, and two depression wetlands. Along with these natural wetlands, multiple drainage features and a few farm dams were also delineated. The different wetland types within the Project Area of Interest were assessed, delineated, and identified based on observations during the site assessment, these wetland types were assigned an overall PES (Present Ecological Status) of Moderate to Seriously modified and the IS (Importance and Sensitivity) of Moderate.

5.3.1.4 Climate

The climate of the project area is classified as a cold semi-arid climate (BSk) according to the Köppen–Geiger climate classification system (climate-data.org). Cold semi-arid climates (type "BSk") tend to be located in elevated portions of temperate zones, typically bordering a humid



continental climate or a Mediterranean climate. They are also typically found in continental interiors some distance from large bodies of water. Cold semi-arid climates usually feature warm to hot dry summers, though their summers are typically not quite as hot as those of hot semi-arid climates. Unlike hot semi-arid climates, areas with cold semi-arid climates tend to have cold and possibly freezing winters. These areas usually see some snowfall during the winter, though snowfall is much lower than at locations at similar latitudes with more humid climates.

In Bloemfontein, the average annual temperature is 17.7 °C and precipitation here is about 577 mm per year. Precipitation is the lowest in July, with an average of 7 mm with the highest precipitation in January, with an average of 97 mm. January is the hottest month of the year with an average temperature of 23.3 °C and the lowest average temperature occurs in July at 9.7 °C (Figure 5.6).

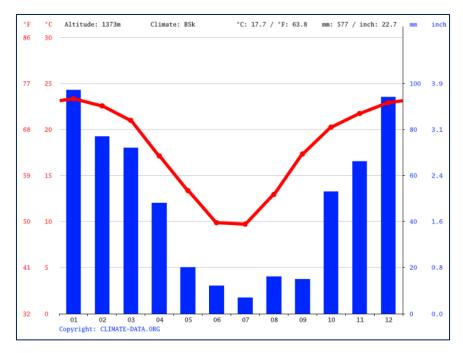


Figure 5.6: Climatic characteristics of Bloemfontein, Free State province.

5.3.1.5 Biodiversity

The primary cause of loss of biological diversity is habitat degradation and loss (IUCN, 2004; Primack, 2006). In the case of this study special attention was given to the identification of sensitive species or animal life and birds on site. The following section will discuss the state of biodiversity on the site in more detail.

<u>Avifaunal</u>

According to the Avifauna Assessment (Appendix E2) the avifauna community recorded within the Project Area of Influence (PAOI) could be regarded as diverse with Eighty-nine (89) bird species were recorded in and around the PAOI with 71 species recorded from point counts (Appendix B) and an additional 18 species recorded as incidental sightings (Appendix C) during the assessments (1-4 April 2023 and 1-4 July 2023). Some species were observed both as incidental records and during the point counts. The total number of individual species accounts for approximately 50% of the total number of expected species.



Four SCCs were recorded, two were recorded during incidental observations, two African Grass Owls were observed, while a further two Secretarybirds were observed in the first survey and again one in the second assessment.

Desktop Information Considered	Relevance
Protected Areas	Irrelevant – Located external to the 5 km buffer of the H.J. Joel Private Nature Reserve
National Protected Areas Expansion Strategy	Irrelevant – Does not overlap with a NPAES Focus Area
Free State Biodiversity Sector Plan	Relevant – Overlaps Critical Biodiversity Area 1 and Ecological Support Areas
Important Bird and Biodiversity Area	Irrelevant – Located 32 km north-west of the Willem Pretorius Game Reserve
Coordinated Water Bird Counts	Irrelevant – Located 32 km north-west of the Allemanskraal Dam
Coordinated Avifaunal Roadcounts	Relevant – Located 45 m east from a CAR route
South African Inventory of Inland Aquatic Ecosystems	Relevant – Overlaps the Critically Endangered Doring River
National Freshwater Ecosystem Priority Areas	Relevant – Overlaps NFEPA wetlands

Table 5.2: Summary of relevance of the proposed project to ecologically important landscapefeatures

Important Bird and Biodiversity Areas

Important Bird & Biodiversity Areas (IBAs) are the sites of international significance for the conservation of the world's birds and other conservation significant species as identified by BirdLife International. These sites are also all Key Biodiversity Areas; sites that contribute significantly to the global persistence of biodiversity.

The selection of IBAs is achieved through the application of quantitative ornithological criteria, grounded in up-to-date knowledge of the sizes and trends of bird populations. The criteria ensure that the sites selected as IBAs have true significance for the international conservation of bird populations and provide a common currency that all IBAs adhere to, thus creating consistency among, and enabling comparability between, sites at national, continental and global levels.

The proposed development does not overlap any IBAs, and the nearest IBA is the Willem Pretorius Game Reserve, located approximately 32 km to the south-east.

Expected Species of Conservation Concern

Priority species are susceptible to impacts from energy developments (Ralston Paton et al. 2017). These species are typically susceptible to collisions. This list was developed initially for use with Wind Energy Facilities (Ralston Paton et al. 2017); however, the collision, electrocution and habitat loss risks are considered appropriate for renewable energy developments and so are utilised here. Also utilised here is the Eskom and Endangered Wildlife



Trust (EWT) poster: Birds and Powerlines (Eskom & EWT, no date), which identifies birds most prone to collision and electrocution from powerlines. Some birds are not included in these lists but are considered by the TBC avifauna specialists as risk species for collisions, electrocutions and habitat loss as a result of Solar PV infrastructure. All of species are referred to collectively in this report as "Risk Species". Several species were found that would be regarded as high-risk species

Table 5.3: Avifauna species of conservation concern that are expected to occur within the proposed Makoaneng Solar Power Plant PAOI. CR = Critically Endangered, EN = Endangered, LC = Least Concern, NT = Near Threatened and VU = Vulnerable. *Not necessarily occupying habitats within the PAOI but likely to fly over to access suitable habitat. ** Not observed during this survey but during a previous survey

Common Name	Scientific Name	Regional	Global	Likelihood of Occurrence
Black Harrier	Circus maurus	EN	EN	Moderate
Black-winged Pratincole	Glareola nordmanni	NT	NT	Low
Blue Crane	Anthropoides paradiseus	NT	VU	Low
Blue Korhaan	Eupodotis caerulescens	LC	NT	Confirmed
Greater Flamingo	Phoenicopterus roseus	NT	LC	Low
Secretarybird	Sagittarius serpentarius	VU	EN	Confirmed
African Marsh Harrier	Circus ranivorus	EN	LC	Confirmed
African Grass Owl	Tyto capensis	VU	LC	Confirmed

Circus maurus (Black Harrier) is endemic to southern Africa, where its core range is in the Western Cape, but also occurs in the Eastern Cape, the Northern Cape and Free State (where it is irruptive in both areas), Lesotho and Namibia (BirdLife International, 2021b). The species occupies coastal and montane fynbos, highland grasslands, Karoo subdesert scrub, open plains with low shrubs and croplands. It often breeds close to coastal and upland marshes with tall shrubs or reeds, occurring in dry steppe and grassland areas further north in the non-breeding season. Local fluctuations in breeding numbers may be related to population cycles in its prey base, such as mice whose numbers fluctuate with rainfall, especially in the more arid regions. The total population is estimated at < 1 000 individuals in South Africa, Lesotho and Eswatini (Taylor et al, 2015) with only around 10 mature individuals outside this region. The population is thought to have undergone a major decline of 85% in the past 100 years (17% in 20 years) due to habitat loss (BirdLife International, 2021b). Habitat is primarily lost to agriculture, and this is compounded by the uncontrolled burning of fynbos and grassland, which renders these habitats unsuitable for breeding for about five years. Additional threats include low hatching rates due to pesticide use and overgrazing.

Eupodotis caerulescens (Blue Korhaan) is endemic to South Africa and Lesotho and occurs in grassveld usually over 1 500 m above sea level, preferring open, fairly short grassland and a mixture of grassland and karoo dwarf-shrubland within 1 km of water, with termite mounds and few or no trees (BirdLife International, 2017). The total global population is estimated to number between 12 000-15 000 individuals, equivalent to 8 000-10 000 mature individuals, with a decreasing population trend. The main threat is intensive agriculture, especially within the east of its range.



Sagittarius serpentarius (Secretarybird) is listed as EN on a global scale (BirdLife International, 2020). The species has a wide distribution across sub-Saharan Africa, but surveyed densities suggest that the total population size does not exceed a five-figure number. Ad-hoc records, localised surveys and anecdotal observations indicate apparent declines in many parts of the species' range, especially in South Africa where reporting rates decreased by at least 60% of quarter degree grid cells used in Southern African Bird Atlas Projects. Threats include excessive burning of grasslands that may suppress populations of prey species, whilst the intensive grazing of livestock is also probably degrading otherwise suitable habitat. Disturbance by humans is likely to negatively affect breeding. The species is captured and traded; however, it is unknown how many deaths occur in captivity and transit. Direct hunting and nest-raiding for other uses and indiscriminate poisoning at waterholes are also further threats. A proposed conservation action is that landowners of suitable properties should join biodiversity stewardship initiatives and to manage their properties in a sustainable way for the species' populations. Its presence within the PAOI was confirmed by a property owner within the area.

Priority Species

Priority species are susceptible to impacts from energy developments (Ralston Paton et al. 2017). These species are typically susceptible to collisions. This list was developed initially for use with Wind Energy Facilities (Ralston Paton et al. 2017); however, the collision, electrocution and habitat loss risks are considered appropriate for renewable energy developments and so are utilised here. Also utilised here is the Eskom and Endangered Wildlife Trust (EWT) poster: Birds and Powerlines (Eskom & EWT, no date), which identifies birds most prone to collision and electrocution from powerlines. Some birds are not included in these lists but are considered by the TBC avifauna specialists as risk species for collisions, electrocutions and habitat loss as a result of Solar PV infrastructure. All of species are referred to collectively in this report as "Risk Species". Several species were found that would be regarded as high-risk species (Table 5.4).

Common Name	Scientific Name	Collisions	Electrocution	Disturbance/Habit at Loss
Afrotis afraoides	Korhaan, Northern Black	х	x	
Alopochen aegyptiaca	Goose, Egyptian	х	х	
Anas undulata	Duck, Yellow-billed	х		
Anhinga rufa	Darter, African	х		
Ardea cinerea	Heron, Grey	х	х	
Asio capensis	Owl, Marsh	х	Х	
Bostrychia hagedash	Ibis, Hadada	х		
Bubulcus ibis	Egret, Western Cattle	х		
Circus ranivorus	Harrier, African Marsh	х	Х	Х
Corvus albus	Crow, Pied	х		
Eupodotis	Korhaan, Blue	х	х	
caerulescens				
Melierax canorus	Goshawk, Pale Chanting	х	х	
Numida meleagris	Guineafowl, Helmeted	х		
Platalea alba	Spoonbill, African	х		
Plectropterus	Goose, Spur-winged	х	х	
gambensis	_			
Sagittarius	Secretarybird	х	x	
serpentarius				
Scopus umbretta	Hamerkop	х		
Tyto capensis	Owl, African Grass	х	х	

Table 5.4: Summary of at risk species found in the surveys



Dominant Species

Trophic guilds are defined as a group of species that exploit the same class of environmental resources in a similar way (González-Salazar et al, 2014). The guild classification used in this assessment is as per González-Salazar et al (2014); they divided avifauna into 13 major groups based on their diet, habitat, and main area of activity. The analysis of the major avifaunal guilds reveals that the species composition during the surveys were dominated by insectivores and granivores, followed by omnivores. No nocturnal studies were performed due to safety concerns, therefore the number of nocturnal species observed is not a true representation of the species composition.

<u>Fauna</u>

Based on the IUCN Red List Spatial Data and AmphibianMap, 17 amphibian species are expected to occur within the area. One of the species are SCCs. The Giant Bull Frog (*Pyxicephalus adspersus*) is a species of conservation concern that may potentially occur in the project area. The Giant Bull Frog is listed as NT on a regional scale. It is a species of drier savannahs. It is fossorial for most of the year, remaining buried in cocoons. They emerge at the start of the rains, and breed in shallow, temporary waters in pools, pans and ditches (IUCN, 2017). The species was confirmed present in the project area during the field assessment.

The IUCN Red List Spatial Data lists 81 mammal species that could be expected to occur within the area The IUCN Red List Spatial Data and the MammalMap database lists 89 mammal species that could be expected to occur within the area.

5.3.1.6 Visual landscape

Based on the VIA report's assessment score, the visual impact of the proposed development will be a "Negative Low Impact" after mitigation and might be visible within a 3km radius from the SPP and within 3km from the grid connection as well due to a quite open, undulating landscape with a low VAC. The undulating plains may provide some screening, but only to a certain extent.

The development is likely to affect only landowners, including farmers and farm workers, in the area as a number of farmsteads are located within the 10km assessment radius. All roads within the 10km assessment radius are secondary roads with a low amount of traffic. These roads are mainly used by farmers in the area as the area surrounding the development is quite isolated.

The majority of the landscape boasts an open, undulating, agricultural landscape with some visual qualities, especially in the summer. During winter months the region is pale with dry grass and trees. Agriculture plays the main role in the area and most people are reliant on agricultural activities.

Radius	Visual Receptors	Visibility rating in terms of proximity
0-1km	SPP - Three farmsteads	High

Table 5.5: ZTV Visibility rating in terms of Proximity to the Solar Power Plant



	Grid Connection	
	- One farmstead	
1-3km	SPP - Six farmsteads	Moderate High
	Grid Connection - Four farmsteads	
3-5km	SPP - Eight farmsteads	Medium
	Grid Connection - Eight farmsteads	
5-10km	SPP - One private nature reserve - 17 farmsteads	Low
	 Grid Connection One private nature reserve 19 farmsteads 	

In terms of possible landscape degradation, the landscape does not appear to have any specific protection or importance and is characterised by mines and agricultural developments. Figure 5.7 and Figure 5.8 below indicates the Zone of Theoretical Visibility for the solar power plant and the proposed grid connection corridor. The ZTV assessment did not consider existing screening such as buildings and vegetation cover but rather the terrain's above mean sea level (AMSL) which indicates line of sight. The main visual receptors in the area are industrial developments, the mining sector and agricultural developments.



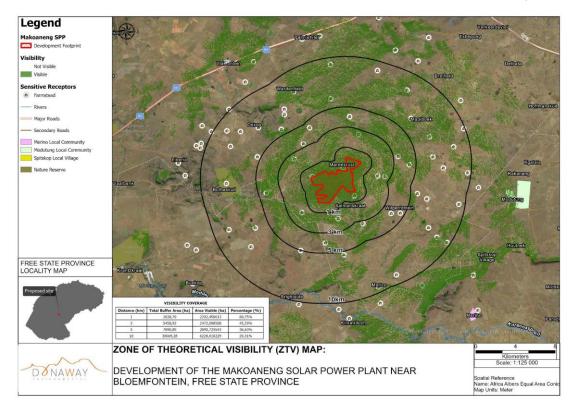


Figure 5.7: Zone of Theoretical Visibility (ZTV) for the Makoaneng Solar Power Plant.

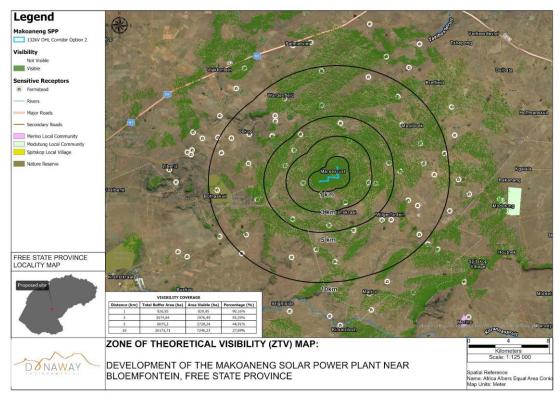


Figure 5.8: Zone of Theoretical Visibility (ZTV) for the proposed grid connection corridor.

5.3.1.7 Traffic consideration

According to the Traffic Impact Study (Appendix E8), The preferred access to the Makoaneng SPP will be via the N1. Information supporting the choice is illustrated under Chapter 3: Transportation Routes. Only three access routes have been identified for the buildable area.



A formal application for these access points will need to be lodged with the Masilonyana Local Municipality and the Free State Department: Police, Roads and Transport. The formalisation of these access points to the standard, will in all probability be a requirement as part of the wayleave approval. It is expected that the communities of Verkeerdevlei, Kgalala, Paradys, Bloemfontein and Maselsport will participate in the construction of the Makoaneng SPP. The development of this solar power plant and other renewable energy projects creates an opportunity for temporary employment and economic upliftment of the surrounding communities.

The following conclusions can be drawn from the traffic and transportation assessment:

- The existing traffic volumes on the transportation routes were sourced from permanent count stations only, as this is the most reliable and accurate data that was available.
- The impact of the construction, operation, and decommissioning trip generation, on the future background traffic volumes near the Makoaneng SPP and along transportation outes, are expected to be low.
- Two possible ports of entry have been identified from where the solar panel technology and large electrical components will be transported, namely: Durban and East London. Based on the shortest travel distance and attractiveness based on travel time, it is recommended that the Port of Durban be the preferred port of entry.
- All construction materials and solar modules will be transported via normal loads. Transformer and substation components will be transported via abnormal loads.
- The access point to the site is situated off the N1. The formalisation of this access point, to the standard, might be a requirement as part of the wayleave approval of the Masilonyana Local Municipality.
- All internal roads considered should conform to the geometric and pavement design parameters as indicated on the design standard certificate.
- Adequate traffic accommodation signage must be erected and maintained on either side of the access, on the N1, throughout the construction phase of the Makoaneng SPP. In addition, traffic accommodation signage should also be erected at affected major intersections on the transportation routes.
- The direct impact and significance of the Makoaneng SPP is considered negative low

5.3.2 Description of the socio-economic environment

The socio-economic environment is described with specific reference to social, economic, heritage and cultural aspects.

5.3.2.1 Socio-economic conditions

The project is proposed within the Free State Province, although is the third-largest province in South Africa, it has the second-smallest population and the second-lowest population



density. It covers an area of 129 825km² and has a population of 2 834 714 – 5.1% of the national population. Languages spoken include Sesotho (64.4%), Afrikaans (11.9%) and Zulu (9.1%). The Free State Province contributes 5.4% to South Africa's total gross domestic product (2006).

Free State Province is the landlocked core of the country. It is centrally placed, with good transport corridors to the north and the coast. It is the third biggest of South Africa's nine provinces in terms of size, and primary agriculture is a key economic sector. Mining is also important but has been declining steadily since 2008.

The Free State is situated in the heart of the country, between the Vaal River in the north and the Orange River in the south, bordered by the Northern Cape, Eastern Cape, North West, Mpumalanga, KwaZulu-Natal and Gauteng provinces, as well as Lesotho. The Free State is a rural province of farmland, mountains, goldfields, and widely dispersed towns. This province is an open, flat grassland with plenty of agriculture that is central to the country's economy. Mining is its largest employer.

Bloemfontein is the capital and is home to the Supreme Court of Appeal, as well as the University of Free State and the Central University of Technology. The province also has 12 gold mines, producing 30 percent of South Africa's output.

Agriculture is a key economic sector – 8% of the country's produce comes from Free State. In 2010, agriculture provided 19.2% of all formal employment opportunities in the region. The economy is dominated by agriculture, mining and manufacturing. Known as the 'bread-basket' of South Africa, about 90% of the province is under cultivation for crop production. It produces approximately 34% of the total maize production of South Africa, 37% of wheat, 53% of sorghum, 33% of potatoes, 18% of red meat, 30% of groundnuts and 15% of wool. The province is the world's fifth-largest gold producer, with mining the major employer.

Other mineral resources – gold, diamonds, and low-grade coal – are also important to the province; mining contributed 9% to the local economy and employed some 33 000 people in 2010. Other commodities include clay, gypsum, salt, and uranium.

Lejweleputswa District Municipality

The Lejweleputswa District Municipality (DM) is a Category C municipality situated in the western central part of the Free State Province. It shares borders with all other DMs in the province, with the Fezile Dabi DM and Thabo Mofutsanyana DM to the north-east and the Mangaung Metropolitan Municipality and Xhariep DM to the south. The Northern Cape Province shares the western border, while the North West Province shares the northern border. The district municipality is the third largest of the five district municipalities, encompassing a quarter of the province's geographical area. Major towns within the district include Bothaville, Bultfontein, Hoopstad, Theunissen, Welkom, and Wesselsbron.

The region covers around 32 286 km2 and has a population of 646 920 people, accounting for 23% of the provincial population. From 2001 to 2011, the district's population declined from 657 012 to 627 626, but increased from 2011 to 2016. The N1 national route, which connects most major cities in South Africa, passes through the district municipality and is a vital transportation route for South Africa.

The Lejweleputswa DM takes its name from "grey rock," reflecting the area's rich history of gold mining and prospecting. It contributes significantly to the Free State Province's goldfields. The Willem Pretorius Game and Nature Reserve, Soetdoring and Sandveld Nature Reserve,



and the annual NAMPO Harvest Day, which brings together the farming industry and farmers once a year, drive the province's tourism sector.

In 2011 the Municipality had a population of 624 746 with a dependency ratio of 51.3. By 2016 the population has increased to 646 920 and the dependency ratio was reduced to 46.2.

Masilonyana Local Municipality

Masilonyana Local Municipality (LM) is a Category B municipality situated in the southern part of the Lejweleputswa District Municipality, located within the Free State Province of South Africa. Positioned between two prominent municipalities of the province, it shares borders with the Mangaung Metropolitan Municipality to the south and the Matjhabeng LM to the north. The remaining western border is shared with the Tokologo LM and Tswelopele LM of the Lejweleputswa DM, with the remaining eastern boundary shared with the Thabo Mofutsanya DM. The formation of this municipality involved the amalgamation of several former traditional local communities, namely Theunissen (which serves as the administrative head office), Brandfort, Winburg, Soutpan, and Verkeerdevlei.

The municipality proudly houses two toll plazas on major provincial roads. The Verkeerdevlei Plaza, located on the N1, serves as the final toll point before reaching Bloemfontein from the north. On the other hand, the Brandfort Plaza, situated on the former R30 (now ZR Mahabane Road), lies between Brandfort and Bloemfontein. Brandfort is renowned for its significant political history, including sites like the National Military Museum, situated on a farm once used as a concentration camp during the Anglo-Boer War, and the Winnie Mandela House, where Mandela was placed under house arrest during the State of Emergency in the 1980s.

Theunissen, positioned on the ZR Mahabane Corridor connecting Bloemfontein and Welkom, plays host to three mines within its municipal jurisdiction. Winburg, located 100km west of Bloemfontein, holds economic potential due to its strategic location, linking Bloemfontein with Johannesburg, Cape Town, and Durban. It proudly showcases the Voortrekker Monument as its Heritage Site, while Masilonyana as a whole boasts several game reserves spread across its towns.

The municipality takes great pride in its diverse tourist destinations, including the Florisbad National Quaternary Research Station, the site where the first human skull was discovered. Additionally, Soutpan features cooper.

5.3.2.2 Cultural and heritage aspects

According to Heritage and Paleontological Impact Assessment (Appendix E6), the area proposed for development is located approximately 40km northeast of the centre of Bloemfontein. Prior to its establishment in 1846, the area is said to have been the location of an Orana settlement and subsequently a Boer settlement. With colonial policy shifts, the region changed into the Orange River Sovereignty (1848–54) and eventually the Orange Free State Republic (1854–1902). From 1902 to 1910 it served as the capital of the Orange River Colony and since that time as the provincial capital of the Free State. In 1910 it became the Judicial capital of the Union of South Africa. The area proposed for development is located in close proximity to a number of structures and werfs. The age and heritage significance of these farm structures will need to be established through a site visit. It is recommended that a no development buffer of 500m is implemented around each werf that is determined to have cultural value.



According to Roodt (2012, SAHRIS NID 48744), "Historically, the area north of Bloemfontein is known for military activities that took place here during the South African War (1900 - 1902). Evidence of fortification can be found on the hills around Bloemfontein..." It is possible such evidence may be present within the area proposed for development.

Bloemfontein is located on the edges of the Great Karoo. Scattered throughout the Karoo is evidence of historic and prehistoric occupation in the form of Early, Middle and Later Stone Age lithics and other material remains. The descendents of the historic and prehistoric occupants of the region are found in the indigenous Khoe and San, as well as modern inhabitants of the area.

Tomose (2013) notes that the earliest evidence of Iron Age communities in the Free State is documented in the south-eastern region of the Free State where they came into contact with the San people. Most of the existing evidence about the Iron Age communities in the Free State dates to the 16th and 18th when they moved across the Vaal River coming to contact with the San hunter-gather people (Klatzow 1994). Numerous stone wall structures and pottery dating to this period have been recorded and lie on the frontier zone where the San people come into contact with agro-pastoralist (Thorp 1996). Stonewalls are one major characteristic of the Iron Age people. However, they are not the only characteristic of features of the Iron Age. Huffman (1982) described cattle dug, both vitrified and unverified, as one of the Iron Age traits. He also included pits and burials, with some located inside the cattle kraals (ibid)."

Site specific review

Over 20 observations were made during the field assessment. A few CCS and hornfels flakes were found in exposed areas with evidence of Later Stone Age material and it is likely that exposed Middle and Early Stone Age material could be located closer to the Osspruit. No open scatters dating to these periods were found in the study area and this is not surprising given the intense farming that has taken place over the last century. The majority of the heritage resources found consisted of early 20th century occupation of the area in the form of the farm graveyards at Mareesrust and Goedehoop, stone walled kraals and outbuildings and the main werfs which have been altered over the last 50 years before falling into various states of disuse in the last decades. While the Mareesrust werf and its associated buildings and graveyard fall just outside the study area, the Selborne/Gerritsrus werf and ruins do lie inside, and a couple of historic stone kraals and ruins have been graded as having low local significance. These can easily be avoided in the planning of the infrastructure needed for the solar project. The Enkeldoring werf lies just outside the boundary of the development but the Goedehoop werf has a number of ruined buildings east of the farm track leading into the main werf that fall inside the study area. There is also a graveyard south of these ruins that is fenced off that should be avoided in the planning of the panels and access routes.

<u>Palaeontology</u>

According to the SAHRIS Palaeosensitvity Map (Figure 5.9), the study area is underlain by sediments of zero and very high palaeontological sensitivity. The sediments underlying the study area include Karoo Dolerite which has no palaeontological sensitivity. The development area is also underlain by sediments of the Karoo Supergroup including the Adelaide Subgroup (Pa) which have very high palaeontological sensitivity. This formation forms part of the Dicynodon and Lystrosaurus assemblage zones and is known to include fossils of fish,



amphibians, reptiles, therapsids and vertebrate burrows. Diverse terrestrial and freshwater tetrapods of Pristerognathus to Dicynodon Assemblage Zones (amphibians, true reptiles, synapsids – especially therapsids) have been found in this formation, as well as palaeoniscoid fish, freshwater bivalves, trace fossils (including tetrapod trackways), sparse to rich assemblages of vascular plants (Glossopteris Flora, including spectacular petrified logs) and insects. Based on the known palaeontological sensitivities of the Adelaide Subgroup, it is recommended that a palaeontological assessment of the areas proposed for development is completed and anticipated impacts to such resources assessed.

The proposed Makoaneng SPP is underlain by Permian aged sandstone and shale of the Adelaide Subgroup (Beaufort Group, Karoo Supergroup). According to the PalaeoMap of the South African Heritage Resources Information System (SAHRIS) the Palaeontological Sensitivity of the Adelaide Subgroup (Beaufort Group) is Very High (Almond and Pether, 2009; Almond et al., 2013, Groenewald et al 2014). Updated Geology (Council of Geosciences) indicates that the proposed development is primarily underlain by the Balfour Formation of the Adelaide Subgroup. The Very High Palaeontological Sensitivity of the Balfour Formation triggered a site investigation.

A site-specific field survey of the development footprint was conducted on foot and by motor vehicle on 20 March 2023. The study area has a very flat topography with isolated ground surface outcrops. No fossils were detected in the development area. The apparent rarity of fossil heritage in the proposed development footprint suggests that the impact of the development will be of a Low significance in palaeontological terms. It is therefore considered that the proposed development will not lead to damaging impacts on the palaeontological resources of the area. The construction of the development may thus be permitted in its whole extent, as the development footprint is not considered sensitive in terms of palaeontological resources.



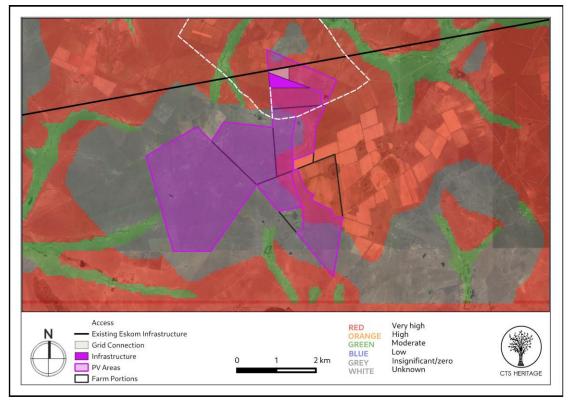


Figure 5.9: Palaeontological sensitivity of the proposed development area.

5.4 SITE SELECTION MATRIX

Due to the nature of the proposed development, the location of the solar power plant is largely dependent on technical and environmental factors such as solar irradiation, climatic conditions, topography of the site, access to the grid and capacity of the grid. Studies of solar irradiation worldwide indicate that the Free State Province has a high potential for the generation of power from solar.

The receptiveness of the site to PV Development includes the presence of optimal conditions for the sitting of a solar energy facility due to high irradiation values and optimum grid connection opportunities (i.e. the grid connection points are located within the affected property which minimizes the length of power line development and consolidates the overall impacts and disturbance of the project within the affected property). The proposed development site is considered favorable and suitable from a technical perspective due to the following characteristics:

- <u>Climatic conditions</u>: Climatic conditions determine if the project will be viable from an economic perspective as the solar power plant is directly dependent on the annual direct solar irradiation values of a particular area. The Free State receives high averages of direct normal and global horizontal irradiation, daily. This is an indication that the regional location of the project includes a low number of rainy days and a high number of daylight hours experienced in the region. Global Horizontal Radiation of ~2118 kWh/m²/year is relevant in the area.
- <u>Topographic conditions</u>: The surface area on which the proposed facility will be located has a favourable level topography, which facilitates work involved with construction and maintenance of the facility and ensures that shadowing on the panels do not occur. The topographic conditions, which are favourable, minimizes the



significance of the impact that will occur during the clearing and leveling of the site for the construction activities.

- Extent of the site: A significant portion of land is required to evacuate the prescribed 550MW and space is a constraining factor in PV facility installations. Provision was made to assess a larger area than is required for the facility to make provision for any other environmental or technical constraints that may arise and avoiding those areas. Larger farms are sought after to make provision for any constraints imposed by the Department of Agriculture on the extent of land that may be used for such facilities per farm, as well as the opportunities presented for the avoidance of sensitive environmental features present. The development footprint assessed therein is considered to provide an opportunity for the successful construction and operation of a solar power plant with a capacity of 550MW, as well as opportunities for the avoidance and mitigation of impacts on the affected environment and sensitive environmental features.
- <u>Site availability and access</u>: The land is available for lease by the developer. Reluctant farm owners or farmers over capitalizing hamper efforts to find suitable farms. Proposed Access Alternative 1 has been identified by the client as the "preferred" access. Proposed Access Alternative 2 is an (additional) access route that has been identified and is located to the south of the proposed site and is via the existing Unnamed Road and subsequent local gravel (i.e., "farm") access roads.
- <u>Grid connection</u>: In order for the PV facility to connect to the national grid the facility will have to construct an on-site substation, Eskom switching station and a power line from the project site to connect to the Eskom grid. Available grid connections are becoming scarce and play a huge role when selecting a viable site. Three grid connection options are available and all three are located within the same grid connection corridor which presents an opportunity for the consolidation of infrastructure and disturbance within the affected landscape.
- <u>Environmental sensitivities</u>: From an environmental perspective the proposed site is considered highly desirable due to limited environmental sensitivities in terms of geology, and soils, agricultural potential, vegetation and landscape features, climate, biodiversity and the visual landscape refer to Section 5.3.1 of this report. The area proposed for development exclusively consists of land used for agriculture, but wetland features and a historical burial site are located on the development footprint, as well as a few protected plant species, that will need to be considered by the developer for the placement of the facility infrastructure within the development footprint.

It is evident from the discussion above that the proposed development area may be considered favourable and suitable in terms of the site and environmental characteristics. As mentioned previously, no alternative areas on the property have been considered for the placement of the development footprint. Provision will be made to exclude any sensitive areas from the facility layout to be developed within the development footprint.

5.5 CONCLUDING STATEMENT ON ALTERNATIVES

When considering the information provided by the specialists with regards to the site selection criteria, the site is identified as preferred due to fact that the opportunities



presented on the site to develop the project in such a way which avoids the areas and features (including the associated buffers) of environmental sensitivity.

Therefore, development of the 550 MW Makoaneng Solar Power Plant is the preferred option.

Considering the environmental sensitive features present within the development footprint, the Applicant has proposed a draft facility layout which considers these features, and thereby aim to avoid any direct impact on these features. The draft layout will be further assessed as part of the EIA Phase of the project. Refer to Figure L for the draft layout proposed for development.



6 DESCRIPTION OF THE IMPACTS AND RISKS

This section aims to address the following requirements of the regulations:

Appendix 2. (2) A scoping report (...) must include-

(v) the impacts and risks identified for each alternative, including the nature, significance,

consequence, extent, duration and probability of the impacts, including the degree to which these impacts-

(aa) can be reversed;

(bb) may cause irreplaceable loss of resources; and

(cc) can be avoided, managed or mitigated;

(vi) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;

(vii) positive and negative impacts that the proposed activity and alternatives will have on

the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;

(viii) the possible mitigation measures that could be applied and level of residual risk;

6.1 SCOPING METHODOLOGY

The contents and methodology of the scoping report aims to provide, as far as possible, a user-friendly analysis of information to allow for easy interpretation.

- <u>Checklist (see section 6.1.1)</u>: The checklist consists of a list of structured questions related to the environmental parameters and specific human actions. They assist in ordering thinking, data collection, presentation and alert against the omission of possible impacts.
- Matrix (see section 6.1.2): The matrix analysis provides a holistic indication of the relationship and interaction between the various activities, development phases and the impact thereof on the environment. The method aims at providing a first order cause and effect relationship between the environment and the proposed activity. The matrix is designed to indicate the relationship between the different stressors and receptors which leads to specific impacts. The matrix also indicates the specialist studies that have been conducted to address the potentially most significant impacts.

6.1.1 Checklist analysis

The independent consultant conducted a site visit on 28 February 2023. The site visit was conducted to ensure a proper analysis of the site-specific characteristics of the study area. Table 6.1 provides a checklist, which is designed to stimulate thought regarding possible consequences of specific actions and so assist scoping of key issues. It consists of a list of structured questions related to the environmental parameters and specific human actions. They assist in ordering thinking, data collection, presentation and alert against the omission



of possible impacts. The table highlights certain issues, which are further analysed in matrix format in section 6.2.

Table	6.1: Environmental checklist	
-------	------------------------------	--

QUESTION	YES	NO	Un-	Description
			sure	
1. Are any of the following located on	the sit	e earm	arked fo	r the development?
I. A river, stream, dam or wetland	×			Four wetland types were identified on site namely Channelled and unchanneled Valley Bottom, Seep, and Depressions.
II. A conservation or open space area		×		Most of the proposed development footprint represents Ecological Support Areas (ESA), including ESA1 and ESA2 areas, although most of these areas represent degraded grassland.
III. An area that is of cultural importance	×			Some heritage features were identified on the footprint, however these have been excluded from the development footprint.
IV. Site of geological significance		×		None.
V. Areas of outstanding natural		×		None.
VI. Highly productive agricultural land		×		None.
VII. Floodplain		×		None.
VIII. Indigenous Forest		×		None.
IX. Grass land	×			The project is located within the Winburg Grassy Shrubland (Gh7) which is classified as 'Least threatened' and Central Free State Grassland (Gh6) which is classified as 'Vulnerable'.
X. Bird nesting sites		×		The Avifaunal Assessment (refer to Appendix E3) indicated that no nests of SCC or priority species were recorded.
XI. Red data species		×		The Avifauna Impact Assessment (refer to Appendix E3) did not record any Red Data Species on site but indicated that they could possibly occur on site.
XII. Tourist resort		×		None.
2. Will the pro	oject po	otentia	lly result	in potential?
I. Removal of people		×		None.



II. Visual Impacts			The VIA (refer to Appendix E4)
			confirmed that the significance of
			the visual impact will be a "Negative
	×		Low Impact". The only receptors
			likely to be impacted by the proposed development are the
			nearby property owners and road
			users on nearby roads.
III. Noise pollution			Construction activities will result in
		×	the generation of noise over a
			period of 18-24 months. The noise
			impact is unlikely to be significant.
IV. Construction of an access road	×		A new access road will be
	^		constructed for the facility
V. Risk to human or valuable			None.
ecosystems due to explosion/fire/		×	
discharge of waste into water or air.			
VI. Accumulation of large workforce			Approximately 200 - 600
(>50 manual workers) into the site.			employment opportunities will be
	×		created during the construction
			phase and 35 - 50 employment opportunities during the operation
			phase of the SPP project.
VII. Utilisation of significant volumes			The estimated maximum amount of
of local raw materials such as water,	×		water required during the facility's
wood etc.			20 years of production is approximately 7000m ³ per annum.
VIII. Job creation			Approximately 200 - 600
			employment opportunities will be created during the construction
	×		phase and 35 - 50 employment
			opportunities during the operation
			phase of the SPP project.
IX. Traffic generation			It is estimated that 72 trips per day
	×		will be generated over the 18-24
	^		month construction period for the
			SPP.
X. Soil erosion			The site will need to be cleared or
			graded to a limited extent, which
			may potentially result in a degree of
			dust being created, increased runoff and potentially soil erosion. The
	×		time that these areas are left bare
			will be limited to the construction
			phase, since vegetation will be
			allowed to grow back after
			construction.
		1	



XI. Installation of additional bulk telecommunication transmission lines or facilities		×	None.
3. Is the propos	ed proj	ect loc	cated near the following?
I. A river, stream, dam or wetland	×		Four wetland types were identified on site namely Channelled Valley Bottom, Seep, Unchannelled Valley Bottom and Depressions
II. A conservation or open space area		×	None.
III. An area that is of cultural		×	None.
IV. A site of geological significance		×	None.
V. An area of outstanding natural		×	None.
VI. Highly productive agricultural land		×	None.
VII. A tourist resort		×	None.
VIII. A formal or informal settlement	×		Bloemfontein (located approximately 40 km south west of the proposed development).

6.1.2 Matrix analysis

The matrix describes the relevant listed activities, the aspects of the development that will apply to the specific listed activity, a description of the environmental issues and potential impacts, the significance and magnitude of the potential impacts and possible mitigation measures. The matrix also highlights areas of particular concern (see Table 6.2) for more in depth assessment during the EIA process. An indication is provided of the specialist studies being conducted and which informed the initial assessment. Each cell is evaluated individually in terms of the nature of the impact, duration and its significance – <u>should no mitigation measures be applied</u>. This is important since many impacts would not be considered insignificant if proper mitigation measures were implemented.

In order to conceptualise the different impacts, the matrix specify the following:

- **Stressor**: Indicates the aspect of the proposed activity, which initiates and cause impacts on elements of the environment.
- **Receptor**: Highlights the recipient and most important components of the environment affected by the stressor.
- Impacts: Indicates the net result of the cause-effect between the stressor and receptor.
- Mitigation: Impacts need to be mitigated to minimise the effect on the environment.

Please refer to **Appendix E** (specialist studies) a more in-depth assessment of the potential environmental impacts.



High significance

Positive impact

		ΡΟΤΙ	ENTIAL IMPACTS	<u> </u>			E AND NTIAL I		IITUDE TS	OF	MITI	GATION OF POTENTIAL IMF	PACTS	
LISTED ACTIVITY (The Stressor)	ASPECTS OF THE DEVELOPMENT	Receptors	Impact description / consequence	Minor	Major	Extent	Duration	Probability	Reversibility	Irreplaceable loss of resources	Possible Mitigation	Possible mitigation measures	Level of residual risk	SPECIALIST STUDIES / INFORMATION
		•	CONSTRUCTION PHASE			•	-	•	•				•	
Activity 11(i) (GN.R. 327): "The development of facilities or infrastructure for the transmission and distribution of electricity outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts." Activity 12(ii)(c) (GN.R. 327): "The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (c)	Site clearing and preparation Certain areas of the site will need to be cleared of vegetation and some areas may need to be levelled. Civil works The main civil works are: • Terrain levelling if necessary– Levelling will be minimal as the potential site chosen is relatively flat.	7	 Destruction, loss and fragmentation of habitats, ecosystems and the vegetation community. Introduction of IAP species and invasive fauna. Displacement of the indigenous faunal community (including SCC) due to habitat loss, direct mortalities, and disturbance (road collisions, noise, dust, light, vibration, and poaching). 		-	S	L	D	PR	ML	Yes	- See Table 6.3	L	Terrestrial Biodiversity, Assessment (Appendix E1)
within 32 meters of a watercourse measured from the edge of a watercourse." <u>Activity 14 (GNR 327):</u> "The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or	 Laying foundation- The structures will be connected to the ground through cement pillars, cement slabs or metal screws. The exact method will depend on the detailed geotechnical analysis. Construction of access and inside roads/paths – existing paths will be used were reasonably possible. Additionally, the turning 	Avifauna SICA H	 Habitat destruction Destruction, degradation and fragmentation of surrounding habitats Displacement of avifauna community Direct mortality from persecution or poaching of avifauna species and collection of eggs Direct mortality from increased vehicle and heavy machinery traffic 		-	S	М	Pr	PR	ML	Yes	- See Table 6.3	L	Avifaunal Assessment (Appendix E2)

Table 6.2: Matrix analysis

Low significance

For ease of reference the significance of the impacts is colour-coded as follow:

Medium significance



more but not exceeding 500	circle for trucks will also be	Air	• Air pollution due to the									- Dust suppression		
cubic metres."	taken into consideration.		increase of traffic of									measures must be		
			construction vehicles and									implemented for		
<u>Activity 24 (ii) (GN.R 327):</u> "The	Transportation and installation of		the undertaking of									heavy vehicles such as		
development of a road (ii) with	PV panels into an Array		construction activities.									, wetting of gravel		
reserve wider than 13,5	<u>·····································</u>											roads on a regular		
meters, or where no reserve	The panels are assembled at the			-		S	S	D	CR	NL	Yes	basis and ensuring	L	-
exists where the road is wider	supplier's premises and will be											that vehicles used to		
than 8 meters."	transported from the factory to the													
	site on trucks. The panels will be											transport sand and		
Activity 28(ii) (GN.R. 327):	mounted on metal structures											building materials are		
"Residential, mixed, retail,	which are fixed into the ground											fitted with tarpaulins		
commercial, industrial or	either through a concrete											or covers.		
institutional developments	foundation or a deep-seated screw.	Soil	Loss of land capability											Soil and
where such land was used for	roundation of a deep seated screw.	3011												Agricultural
agriculture or afforestation on				_		S	S	Pr	PR	ML	Yes	- See Table 6.3	1	-
or after 1998 and where such						5	5			1012	105		-	Assessment
development (ii) will occur	Wiring to the Central Inverters													(Appendix E4)
outside an urban area, where	Sections of the PV array would be													
the total land to be developed	wired to central inverters which	Geology	Collapsible soil.											
is bigger than 1 hectare."	have a maximum rated power of		• Seepage.									- The most effective		
is bigger than i necture.			• Active soil (high soil heave).									mitigation will be the		
Activity 56 (ii) (GN.R 327): "The	2000kW each. The inverter is a		• Erodible soil.									minimisation of the		
widening of a road by more	pulse width mode inverter that		 Hard/compact geology. If 									project footprint by		
than 6 metres, or the	converts DC electricity to		the bedrock occurs close to									using the existing		
lengthening of a road by more	alternating electricity (AC) at grid											roads in the area and		
than 1 kilometre (ii) where no	frequency.		surface it may present											
reserve exists, where the			problems when driving	_	_	S	S	Pr	CR	NL	Yes	not create new roads	1	_
existing road is wider than 8			solar panel columns.			5	5		CN		103	to prevent other	-	
-			• The presence of									areas also getting		
metres"			undermined ground.									compacted.		
Activity 1 (GN.R. 325): "The			 Instability due to soluble 									- Retention of		
development of facilities or			rock.											
infrastructure for the			• Steep slopes or areas of									vegetation where		
generation of electricity from a			unstable natural slopes.									possible to avoid soil		
renewable resource where the			Areas subject to seismic									erosion.		
			activity.											
electricity output is 20		Eviating comises	•											
megawatts or more"		Existing services	• Generation of waste that											
Activity 15 (GN.R. 325): "The		infrastructure	need to be accommodated											
clearance of an area of 20			at a licensed landfill site.											Confirmation
hectares or more of indigenous			• Generation of sewage that	-		L	S	D	PR	ML	Yes	-	L	from the Local
			need to be accommodated											Municipality
vegetation"			by the local sewage plant.											. ,
Activity 10 (b)(i)(hh) (GN.R			 Increase in construction 											
<u>324):</u> "The development and			vehicles on existing roads.											
related operation of facilities		Groundwater	Pollution due to			<u> </u>	<u>د</u>	D		N AL	Vec	- A groundwater		
or infrastructure for the			construction vehicles and	-		S	S	Pr	CR	ML	Yes	monitoring	L	-
or ingrastracture joi the			construction vehicles allu									monitoring		



	 		 		1				, I
storage, or storage and		the storage and handling of							
handling of a dangerous good,		dangerous goods.							
where such storage occurs in									
containers with a combined									
capacity of 30 but not									
exceeding 80 cubic metres (b)									
in the Free State, (i) outside									
urban areas, (hh) areas within									
a watercourse or wetland; or									
within 100 metres from the									
edge of a watercourse or									
wetland."									
Activity 12 (b)(vi) (GN.R 324):									
"The clearance of an area of									
300 square metres or more of									
indigenous vegetation (b) in									
the Free State (vi) areas within									
a watercourse or wetland; or									
within 100 metres from the									
edge of a watercourse or									
wetland."									
Activity 14(ii)(c)(b)(i)(ff) (GN.R									
<u>324): "The development of (ii)</u>									
infrastructure or structures									
with a physical footprint of 10	Surface water	Altered surface flow							
square metres or more, where		dynamics;							
such development occurs (c)		• Erosion;							
within 32 metres of a		• Alteration of sub-surface							
watercourse, measured from		flow dynamics;							
the edge of a watercourse, (b)		• Sedimentation of the water							
within the Free State, (i)		resource;							
outside urban areas within (ff)		• Direct and indirect loss of							
critical biodiversity areas or		wetland areas;	_	L	S	Pr	PR	ML	Yes
ecosystem service areas as		• Water quality impairment;		-	5		11	IVIL	103
identified in systematic		Compaction;							
biodiversity plans adopted by		• Decrease in vegetation;							
the competent authority or in		Change of drainage							
bioregional plans."		patterns;							
Activity 18 (b)(i)(hh) (GN.R		Altering hydromorphic							
<u>324):</u> "The widening of a road		properties; and							
by more than 4 metres, or the		 Indirect loss of wetland 							
lengthening of a road by more		areas							
		41040							1

	-	programme (quality and groundwater levels) should be designed and installed for the site. Monitoring boreholes should be securely capped, and must be fitted with a suitable sanitary seal to prevent surface water flowing down the outside of the casing.		
	-	Full construction details of monitoring boreholes must be recorded when they are drilled.		
	-	Sampling of monitoring boreholes should be done according to recognised standards.		
Yes	-	See Table 6.3	L	Wetland Baseline and Risk Assessment (Appendix E1)



that islometre (b) in the free State (i) outside urbon areas, (bh) oreas within a watercourse or wellond or within 100 metres from the edge of a watercourse or wetiond." Mechanical breakdown / Exposure to high temperatures Fires, electrocutions and spligge of hazardous substances into the surrounding environment. Spligge of hazardous substances into the surrounding environment. Soli contamination – leachate from spillages into the productivity of soil forms in affected areas. Water Polition – spillages into surrounding watercourses as well as groutowater: Health into a surrounding watercourses i.e. minater of water, and the surrounding environment. Soli forms in affected areas. Water Polition – spillages into surrounding matercourses (i.e. rivers, strems, etc) as a primary source of water. Generation of hazardous waste

	-	Operators are trained and competent to operate the BESS. Training should include the discussion of the following:		
		 Potential impact of electrolyte spills on groundwater; 		
		 Suitable disposal of waste and effluent; 		
		 Key measures in the EMPr relevant to worker's activities; 		
es		 How incidents and suggestions for improvement can be reported. 	L	-
	-	Training records should be kept on file and be made available during audits.		
	-	Battery supplier user manuals safety specifications and Material Safety Data Sheets (MSDS) are filed on site at all times.		
	-	Compile method statements for approval by the Technical/SHEQ Manager for the		
		Managerfortheoperationandmanagementandreplacementofbatteryunits/electrolytefor		



1		
	durationoftheprojectlifecycle.Methodstatementsshould be kept on siteat all times.	
-	Provide signage on site specifying the types of batteries in use and the risk of exposure to hazardous material and electric shock. Signage should also specify how electrical and chemical fires should be dealt with by first responders, and the potential risks to first responders (e.g. the inhalation of toxic fumes, etc.).	
-	Firefighting equipment should readily be available at the BESS area and within the site.	
-	Maintain strict access control to the BESS area.	
-	Ensure all maintenance contractors / staff are familiar with the supplier's specifications.	
-	Undertake daily risk assessment prior to the commencement of daily tasks at the BESS. This should consider any aspects which could result in fire or spillage, and	



-	appropriate actions should be taken to prevent these. Standard Operating Procedures (SOPs) should be made available by the Supplier to ensure that the batteries are handled in accordance with required best practices.	
-	Spill kits must be made available to address any incidents associated with the flow of chemicals from the batteries into the surrounding environment.	
-	The assembly of the batteries on-site should be avoided as far as possible. Activities on-site for the BESS should only be limited to the placement of the container wherein the batteries are placed.	
-	Undertake periodic inspections on the BESS to ensure issues are identified timeously and addressed with the supplier where relevant.	
-	The applicant in consultation with the supplier must compile and implement a Leak	



										 and Detection Monitoring Programme during the project life cycle of the BESS. Batteries must be strictly maintained by the supplier or suitably qualified persons for the duration of the project life cycle. No unauthorised personnel should be allowed to maintain the BESS. Damaged and used batteries must be removed from site by the supplier or any other suitably qualified professional for recycling or appropriate disposal. The applicant should obtain a cradle to grave battery management plan from the supplier during the planning and design phase of the system. The plan must be kept on site and adhered to. 		
NOMIC	Local unemployment rate	Job creation.Business opportunities.Skills development.	+	Ρ	S	D	I	N/A	Yes	- See Table 6.3	L	Social Impact Assessment (Appendix E7)
SOCIAL/ECONOMIC ENVIRONMENT	Visual landscape	 Potential visual impact on residents of farmsteads and motorists in close proximity to proposed facility. 		L	S	D	CR	NL	Yes	- See Table 6.3	М	Visual Impact Assessment (Appendix E3)



 			,			,			T			1
Traffic volumes	 Lighting impacts. Solar glint and glare impacts. Visual sense of place impacts. Construction and maintenance of gravel roads in vicinity of the site Increased traffic on haulage routes Increased traffic on local routes 	-		L	S	Pr	CR	NL	Yes	- See Table 6.3	L	Traffic Impact Assessment (Appendix E8)
Health & Safety	 Air/dust pollution. Road safety. Impacts associated with the presence of construction workers on site and in the area. Influx of job seekers to the area. Increased safety risk to farmers, risk of stock theft and damage to farm infrastructure associated with presence of construction workers on the site. Increased risk of veld fires. 		-	L	L	Pr	PR	ML	Yes	- See Table 6.3	м	Social Impact Assessment (Appendix E7)
Noise levels	 The generation of noise as a result of construction vehicles, the use of machinery such as drills and people working on the site. 	-		L	S	D	CR	NL	Yes	 During construction care should be taken to ensure that noise from construction vehicles and plant equipment does not intrude on the surrounding residential areas. Plant equipment such as generators, compressors, concrete mixers as well as vehicles should be kept in good operating order and where appropriate have effective exhaust mufflers. 	L	Social Impact Assessment (Appendix E7)



		Tourism industry Heritage resources	 Since there are no sensitive tourism facilities in close proximity to the site, the proposed activities will not have an impact on tourism in the area. Loss or damage to sites, features or objects of cultural heritage significance 	N/A -	N/A	N/A S	N/A S	N/A U	N/A PR	N/A ML	N/A Yes	N/A - See Table 6.3	N/A L	N/A Heritage Impact Assessment (Appendix E5)
		Paleontological Heritage	 Disturbance, damage or destruction of legally- protected fossil heritage* within the development footprint during the construction phase 	-		S	Ρ	U	IR	ML	Yes	N/A	L	Paleontological Impact Assessment (Appendix E6)
			OPERATIONAL PHASE											
"The development of facilities or infrastructure for the transmission and distribution of electricity outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts." <u>Activity 1 (GN.R 325):</u> "The development of facilities or	The key components of the proposed project are described below: • <u>PV Panel Array</u> - To produce 150 MW, the proposed facility will require numerous linked cells placed behind a protective glass sheet to form a panel. Multiple panels will be required to	Fauna & Flora	 Continued fragmentation and degradation of natural habitats and ecosystems. Continuing spread of IAP and weed species. Ongoing displacement and direct mortalities of the faunal community (including SCC) due to continued disturbance (road collisions, noise, light, dust, vibration, poaching, etc.). 		-	L	L	Ро	PR	ML	Yes	- See Table 6.4	L	Terrestrial Biodiversity, Animal and Plant Species Assessment (Appendix E1)
infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more." Activity 10 (b)(hh) (GN.R 324): "The development and related operation of facilities or infrastructure for the storage,	 Panels will be required to form the solar PV arrays which will comprise the PV facility. The PV panels will be tilted at a northern angle in order to capture the most sun. Wiring to Central Inverters - Sections of the PV array will be wired to central inverters. The inverter is a 	Avifauna	 Collisions with infrastructure associated with the PV Facility Electrocution due to infrastructure associated with the PV Facility Direct mortality from persecution or poaching of avifauna species and collection of eggs 		-	S	L	Pr	PR	ML	Yes	- See Table 6.4	L	Avifaunal Assessment (Appendix E2)



or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (b) in the Free State (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."

	puise width mode inverter
	that converts direct current
	(DC) electricity to
	alternating current (AC)
	electricity at grid
	frequency.
•	Connection to the grid -
	Connecting the array to the
	electrical grid requires
	transformation of the
	voltage from 480V to 33kV
	to 132kV. The normal
	components and
	dimensions of a
	distribution rated electrical
	substation will be required.
	Output voltage from the
	inverter is 480V and this is
	fed into step up
	transformers to 132kV. An
	onsite substation will be
	required on the site to step
	the voltage up to 132kV,
	after which the power will
	be evacuated into the
	national grid.
•	Supporting Infrastructure –
	Auxiliary buildings with
	basic services such as
	water and electricity will be
	constructed on the site.
	Other supporting
	infrastructure includes
	voltage and current

pulse width mode inverter

• <u>Roads</u> – Access will be obtained via an existing grave road off of the N1 National Road . An internal site road network will also be required to provide

circuitry.

regulators and protection

	 Direct mortality by roadkill during maintenance procedures Encroachment of Invasive Alien Plants into disturbed areas 											
Air quality	The proposed development will not result in any air pollution during the operational phase.	N/A	N/A	N/A								
Soil	 Soil degradation, including erosion. Disturbance of soils and existing land use (soil compaction). Loss of agricultural potential (low significance relative to agricultural potential of the site). 		-	L	L	D	PR	SL	Yes	- See Table 6.4	L	Agricultural and Soil Compliance Statement (Appendix E4)
Geology	 Collapsible soil. Active soil (high soil heave). Erodible soil. Hard/compact geology. If the bedrock occurs close to surface it may present problems when driving power line columns. The presence of undermined ground. Instability due to soluble rock. Steep slopes or areas of unstable natural slopes. Areas subject to seismic activity. Areas subject to flooding. 	-		S	S	Ро	PR	ML	Yes	 Surface drainage should be provided to prevent water ponding. Mitigation measures proposed by the detailed engineering geological investigation should be implemented. 	L	-
Groundwater	Leakage of hazardous materials. The development will comprise of a distribution substation and will include transformer bays which will contain transformer oils. Leakage of these oils	-		L	L	Ро	PR	ML	Yes	 All areas in which substances potentially hazardous to groundwater are stored, loaded, worked with or disposed of should be securely bunded (impermeable 	L	-



access to the solar field and associated infrastructure. • Fencing - For health, safety and security reasons, the facility will be required to be fenced off from the surrounding farm.	Surface water	 can contaminate water supplies. Impact on the characteristics of the watercourse Soil compaction and increased risk of sediment transport and erosion Soil and water pollution Spread and establishment of alien invasive species 	-		L	Pr	PR	ML	pre dise gro	or and sides) to event accidental scharge to oundwater. See Table 6.4	Wetland baseline and L Risk Assessment (Appendix E1)
SOCIAL/ECONOMIC	Visual landscape	 Visual impact on observers travelling along the roads and residents at homesteads within a 5km radius of the SPP. Visual impact on observers travelling along the roads and residents at homesteads within a 5-10km radius of the SPP. Visual impacts of lighting at night on sensitive visual receptors in close proximity to the proposed facility. Visual impacts of glint and glare on sensitive visual receptors in close proximity to the proposed facility. Visual impacts of glint and glare on sensitive visual receptors in close proximity to the proposed facility. Visual impacts of glint and glare on sensitive visual receptors in close proximity to the proposed facility. Visual impacts on observers travelling along the roads and residents at homesteads in close proximity to the power line structures. Visual impacts and sense of place impacts associated with the operation phase of SPP. 		- 1	- L	D	PR	ML	Yes - S	See Table 6.4	L Visual Impact Assessment (Appendix E3)



		Traffic volumes Health & Safety		The proposed development will not result in any traffic impacts during the operational phase. The proposed development will not result in any health and safety impacts during the	- N/A	N/A	L N/A	L N/A	Po N/A	CR N/A	NL N/A	Yes N/A	-	L N/A	Traffic Impact Assessment (Appendix E8) N/A
		Noise levels	•	operational phase. The proposed development will not result in any noise pollution during the operational phase.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Heritage resources	•	Loss or damage to sites, features or objects of cultural heritage significance	-		S	S	U	PR	ML	Yes	- See Table 6.4	L	Heritage Impact Assessment (Appendix E5)
		Electricity supply Electrical		Generation of additional electricity. The power line will transport generated electricity into the grid.	+		I	L	D	1	N/A	Yes	-	N/A	-
		infrastructure	•	Additional electrical infrastructure. The proposed solar facility will add to the existing electrical infrastructure and aid to lessen the reliance of electricity generation from coal-fired power stations.	+		I	L	D	I	N/A	Yes	-	N/A	-
				DECOMMISSIONING PHAS	E							_			
Dismantlement of infrastructure During the decommissioning phase the Solar PV Energy facility and its associated infrastructure will be dismantled.	BIOPHYSICAL ENVIRONMENT	Fauna & Flora	•	Improvement of habitat through revegetation / succession over time Soil erosion and sedimentation. Spreading and establishment of alien invasive species		-	S	L	Ро	N/A	N/A	Yes	- See Table 6.5	L	Terrestrial Biodiversity, Assessment (Appendix E1)



Rehabilitation of biophysical		Habitat degradation due to											
environment		dust											
		 Spillages of harmful 											
The biophysical environment will		substances											
be rehabilitated.		Road mortalities of fauna /											
		impact of human activities											
		on site.											
	Air quality	• Air pollution due to the									- Regular maintenance of		
		increase of traffic of construction vehicles.	-		S	S	D	CR	NL	Yes	equipment to ensure reduced exhaust emissions.		-
	Soil	Soil degradation, including											
		erosion.											Agricultural
		• Disturbance of soils and											and Soil
		existing land use (soil			S	S	Pr	PR	м	Yes	- See Table 6.3	L	Compliance
		compaction).			J	3		ΓŇ	141	162			Statement
		Physical and chemical											
		degradation of the soils by											(Appendix E4)
		construction vehicles											
	Castan	(hydrocarbon spills).											
	Geology	It is not foreseen that the											
		decommissioning phase	N/A	N/A	N/A	N/A	N/A						
		will impact on the geology of the site or vice versa.											
	Existing services												
	infrastructure	 Generation of waste that needs to be 											
	mastructure	accommodated at a											
		licensed landfill site.											
		 Generation of sewage that 											
		needs to be				c l			NU	Vaa			
		accommodated by the	-		L	S	D		NL	Yes	-	L	-
		municipal sewerage											
		system and the local											
		sewage plant.											
		Increase in construction											
		vehicles.											
	Groundwater	Pollution due to	_		S	S	Pr	CR	ML	Yes	_	L	_
		construction vehicles.			З	3			IVIL	162	-		-
	Surface water	 Increase in stormwater 						1			- Removal of any		
		run-off.									historically		
		• Pollution of water sources		-	L	S	Pr	PR	ML	Yes	contaminated soil as	М	-
		due to soil erosion.									hazardous waste.		
	н — — — — — — — — — — — — — — — — — — —								•		1	•	•



	Visual landscap	 Potential visual impact on visual receptors in close proximity to proposed facility. The decommissioning phase of the project will result in the same visual impacts experienced during the construction phase of the project. However, in the case of Makoaneng SPP it is anticipated that the proposed facility will be refurbished and upgraded to prolong its life. 	-	L	S	D	CR	NL	Yes
	Traffic volume	vehicles.	-	L	S	Pr	CR	NL	Yes
	Health & Safet	Air/dust pollution.Road safety.	-	L	S	Pr	PR	ML	Yes

	 Removal of hydrocarbons and other hazardous substances by a suitable contractor to reduce contamination risks. Removal of all substances which can result in groundwater (or surface water) contamination. 		
'es	- See Table 6.3	L	Visual Impact Assessment (Appendix E3)
'es	- Movement of heavy construction vehicles through residential areas should be timed to avoid peak morning and evening traffic periods. In addition, movement of heavy construction vehicles through residential areas should not take place over weekends.	L	Traffic Impact Assessment (Appendix E8)
es	- See Table 6.3	L	Social Impact Assessment



	Increased crime levels. The											(Appendix E7)
	presence of construction											
	workers on the site may											
	increase security risks											
	associated with an increase											
	in crime levels as a result of											
	influx of people in the rural											
	area.											
Noise levels	• The generation of noise as											Social Impact
	a result of construction				_	_						Assessment
	vehicles, the use of	-		L	S	D	CR	NL	Yes	- See Table 6.3	L	Assessment
	machinery and people											(Appendix E7)
	working on the site.											
Tourism	Since there are no tourism											
industry	facilities in close proximity											
	to the site, the	N/A	N/A	N/A								
	decommissioning activities	-	-									
	will not have an impact on											
	tourism in the area.											
Heritage	It is not foreseen that the											Heritage
resources	decommissioning phase				_							Impact
	will impact on any heritage	-		S	S	U	PR	ML	Yes	- See Table 6.3		Assessment
	resources.											(Appendix EE)
												(Appendix E5)

Nature of the impact:	(N/A) No impact	(+) Positive Impact (-)	Negative Impact		
Geographical extent:	(S) Site;	(L) Local/District;	(P) Province/Region;	(I) International and National	
Probability:	(U) Unlikely;	(Po) Possible;	(Pr) Probable;	(D) Definite	
Duration:	(S) Short Term;	(M) Medium Term;	(L) Long Term;	(P) Permanent	
Intensity / Magnitude:	(L) Low;	(M) Medium;	(H) High;	(VH) Very High	
Reversibility:	(CR) Completely Reversible;	(PR) Partly Reversible;	(BR) Barely Reversible;	-	
Irreplaceable loss of resources:	(IR) Irreversible	(NL) No Loss;	(ML) Marginal Loss;	(SL) Significant Loss;	(CL) Complete
Level of residual risk:	(L) Low;	(M) Medium;	(H) High;	(VH) Very High	-

te Loss



6.2 KEY ISSUES IDENTIFIED

From the above it is evident that mitigation measures should be available for potential impacts associated with the proposed activity and development phases. The scoping methodology identified the following key issues which should be addressed in more detail in the EIA report.

6.2.1 Impacts during the construction phase

During the construction phase the following activities will have various potential impacts on the biophysical and socio-economic environment:

- <u>Activity 11(i) (GN.R. 327):</u> "The development of facilities or infrastructure for the transmission and distribution of electricity outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts."
- <u>Activity 12(ii)(c) (GN.R. 327):</u> "The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (c) within 32 meters of a watercourse measured from the edge of a watercourse."
- <u>Activity 14 (GNR 327):</u> "The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres."
- <u>Activity 24 (ii) (GN.R 327):</u> "The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters."
- <u>Activity 28(ii) (GN.R. 327):</u> "Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare."
- <u>Activity 56 (ii) (GN.R 327): "</u>The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre (ii) where no reserve exists, where the existing road is wider than 8 metres..."
- <u>Activity 1 (GN.R. 325):</u> "The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more..."
- <u>Activity 15 (GN.R. 325):</u> "The clearance of an area of 20 hectares or more of indigenous vegetation..."
- <u>Activity 10 (b)(i)(hh) (GN.R 324):</u> "The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (b) in the Free State, (i) outside urban areas (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."
- <u>Activity 12 (b)(vi) (GN.R 324):</u> "The clearance of an area of 300 square metres or more of indigenous vegetation (b) in the Free State, (vi) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."



- <u>Activity 14(ii)(c)(b)(i)(ff) (GN.R 324):</u> "The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more, where such development occurs (c) within 32 metres of a watercourse, measured from the edge of a watercourse, (b) within the Free State, (i) outside urban areas within (ff) critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans."
- <u>Activity 18 (b)(i)(hh) (GN.R 324):</u> "The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (b) in the Free State (i) outside urban areas, within (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."

During the construction phase temporary negative impacts are foreseen over the short term. Table 6.3 summarizes the potentially most significant impacts and the mitigation measures that are proposed during the construction phase.



Table 6.3: Impacts and the mitigation measures during the construction phase

SPECIALIST STUDY	IMPACT	PRE- MITIGATION RATING	POST MITIGATION RATING	SUMMARY OF MITIGATION MEASURES
Terrestrial Biodiversity Assessment (Appendix E1)	Destruction,lossandfragmentationofhabitats,ecosystemsandthevegetation community.IntroductionofIAP species	Negative Medium Negative	um	 Areas rated as High sensitivity in proximity to the development areas, should be declared as 'no-go' areas during the life of the project, and all efforts must be made to prevent access to this area from construction workers, machinery. The infrastructure should be realigned to prioritise development within very low/low sensitivity areas. Mitigated development in medium sensitivity areas is
	and invasive fauna. Displacement of the indigenous faunal community (including SCC) due to habitat loss, direct mortalities, and disturbance (road collisions, noise, dust, light, vibration, and poaching).	Medium Negative Medium	Negative Low	 Areas. Writigated development in medulin sensitivity areas is permissible. High sensitivity areas are to be avoided. Areas of indigenous vegetation, even secondary communities outside of the direct project footprint, should under no circumstances be fragmented or disturbed further than that proposed for the project. Clearing of vegetation should be minimized and avoided where possible. Brush cutting of vegetation beneath the panels should be, implemented, otherwise controlled grazing by small livestock like sheep. Technology alternatives should preferably avoid the clearing of vegetation underneath the panels Where possible, existing access routes and walking paths must be made use of. All laydown, chemical toilets etc. should be restricted to very low/ low
				sensitivity areas. Any materials may not be stored for extended periods of time and must be removed from the project area once the construction/closure phase has been concluded. No storage of vehicles or equipment will be allowed outside of the designated project areas.



- A hydrocarbon spill management plan must be put in place, to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas. The Contractor shall be in possession of an emergency spill kit that must always be complete and available on site. Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. No servicing of equipment may occur on site, unless necessary. All contaminated soil / yard stone shall be treated in situ or removed and be placed in containers. Appropriately contain any generator diesel storage tanks, machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) in such a way as to prevent them leaking and entering the environment.
- Storm Water run-off & Discharge Water Quality monitoring
- A carefully considered surface water/drainage management plan must be developed for the site including attention to the use of environmentally friendly cleaning chemicals for cleaning of panels during the operational phase.
- It should be made an offence for any staff to take/ bring any plant species into/out of any portion of the project area. No plant species whether indigenous or exotic should be brought into/taken from the project area, to prevent the spread of exotic or invasive species or the illegal collection of plants.
- Consult a fire expert and compile and implement a fire management plan to minimise the risk of veld fires around the project site
- Any individual of the protected plants that was observed needs a relocation or destruction permit in order for any individual that may be removed or destroyed due to the development. Preferably, the trees/plants should be avoided. Hi visibility flags must be placed near



	any protected plants in order to avoid any damage or destruction of the species. If left undisturbed the sensitivity and importance of these species needs to be part of the environmental awareness program.
	 The areas to be developed must be specifically demarcated to prevent movement of staff or any individual into the surrounding environments,
	 Signs must be put up to enforce this
	 Noise must be kept to an absolute minimum during the evenings and at night, to minimize all possible disturbances to amphibian species and nocturnal mammals
	 No trapping, killing, or poisoning of any wildlife is to be allowed.
	 Signs must be put up to enforce this;
	Outside lighting should be designed and limited to minimize impacts on
	fauna. All outside lighting should be directed away from highly sensitive
	areas. Fluorescent and mercury vapor lighting should be avoided and
	sodium vapor (green/red) lights should be used wherever possible. Try
	incorporating motion detection lights as much as possible to reduce the
	duration of illumination. Heights of light columns to be minimised to
	reduce light spill. Baffles, hoods, or louvres to also be used to reduce light spill
	All construction and maintenance motor vehicle operators should
	undergo an environmental induction that includes instruction on the
	need to comply with speed limits, to respect all forms of wildlife. Speed
	limits must still be enforced to ensure that road killings and erosion is
	limited.
	 Any holes/deep excavations must be dug and planted in a progressive manner;



	• Should the holes overnight they must be covered temporarily to ensure
	no small fauna species fall in and subsequently inspected prior to
	backfilling
	• A qualified environmental control officer must be on site when
	construction begins. A site walk through is recommended by a suitably
	qualified ecologist prior to any construction activities, preferably
	during the wet season and any SSC should be noted. In situations where
	the threatened and protected plants must be removed, the proponent
	may only do so after the required permission/permits have been
	obtained in accordance with national and provincial legislation. In the
	abovementioned situation the development of a search, rescue and
	recovery program is suggested for the protection of these species.
	Should animals not move out of the area on their own relevant
	specialists must be contacted to advise on how the species can be
	relocated
	• Once the development layout has been confirmed, the open areas
	must be fenced off appropriately pre-construction in order to allow
	animals to move or be moved into these areas before breaking ground
	activities occur. Construction activities must take place systemically,
	especially in relation to the game farm area.
	 Wildlife-permeable fencing with holes large enough for mongoose and
	other smaller mammals should be installed, the holes must not be
	placed in the fence where it is next to a major road as this will increase
	road killings in the area
	Fencing mitigations:
	 Top 2 strands must be smooth wire
	Routinely retention loose wires
	Minimum 30cm between wires



	Place markers on fences
	 Compilation of and implementation of an alien vegetation
	management plan.
	• The footprint area of the construction should be kept to a minimum.
	The footprint area must be clearly demarcated to avoid unnecessary
	disturbances to adjacent areas
	• Waste management must be a priority and all waste must be collected
	and stored adequately. It is recommended that all waste be removed
	from site on a weekly basis to prevent rodents and pests entering the
	site
	• A pest control plan must be put in place and implemented; it is
	imperative that poisons not be used due to the likely presence of SCCs
	• Dust-reducing mitigation measures must be put in place and strictly
	adhered to. This includes wetting of exposed soft soil surfaces.
	• No non environmentally friendly suppressants may be used, as this
	could result in pollution of water sources
	• Waste management must be a priority and all waste must be collected
	and stored adequately. It is recommended that all waste be removed
	from site on a weekly basis to prevent rodents and pests entering the
	site.
	 Refuse bins will be emptied and secured;
	• Temporary storage of domestic waste shall be in covered waste skips;
	and
	 Maximum domestic waste storage period will be 10 days.
	• Toilets at the recommended Health and Safety standards must be
	provided. These should be emptied twice a day, to prevent staff from
	using the surrounding vegetation.



	The Contractor should supply sealable and properly marked domestic
	waste collection bins and all solid waste collected shall be disposed of
	at a licensed disposal facility. Under no circumstances may domestic
	waste be burned on site
	 Refuse bins will be emptied and secured. Temporary storage of
	domestic waste shall be in covered waste skips. Maximum domestic
	waste storage period will be 10 days.
	Suitable temporary solid waste facilities are to be incorporated into the
	design to prevent unsanitary conditions. These are to be cleared
	weekly and waste collected by the local waste management
	department. The residents must be encouraged to recycle.
	All personnel and contractors to undergo Environmental Awareness
	Training. A signed register of attendance must be kept for proof.
	Discussions are required on sensitive environmental receptors within
	the project area to inform contractors and site staff of the presence of
	Red / Orange List species, their identification, conservation status and
	importance; and biology, habitat requirements and management
	requirements in the EA and EMPr. The avoidance and protection of the
	wetland areas must be included into a site induction. Contractors and
	employees must all undergo the induction and made aware of the "no-
	go" to be avoided.
	 Speed limits must be put in place to reduce erosion.
	Reducing the dust generated by the listed activities above, especially
	the earthmoving machinery, through wetting the soil surface; putting
	up signs to enforce speed limit; and speed bumps built to force slow
	speeds;
	 Signs must be put up to enforce this.



				 Where possible, existing access routes and walking paths must be made use of. Areas that are denuded during construction need to be re-vegetated with indigenous vegetation, to prevent erosion during flood events and strong winds. A stormwater management plan must be compiled and implemented.
Avifaunal Assessment (Appendix E3)	Habitat destruction	Negative High	Negative Medium	 Solar panels must be mounted on pile driven or screw foundations, such as post support spikes, rather than heavy foundations, such as trench-fill or mass concrete foundations, to reduce the negative effects on natural soil functioning, such as its filtering and buffering characteristics, while maintaining habitats for both fossorial and epigeic biodiversity (Bennun et al, 2021). If concrete foundations are used that would increase the impact of the project as there would be direct impacts to soil permeability and characteristics, thereby influencing inhabitant fauna. In addition, stormwater runoff and runoff from cleaning the panels would be increased, increasing erosion in the surrounding areas. Indigenous vegetation to be maintained under the solar panels to ensure biodiversity is maintained and to prevent soil erosion (Beatty et al, 2017; Sinha et al, 2018). The photographs below are sourced from these documents. Vegetation clearing to commence only after the necessary permits have been obtained. Environmental Officer (EO) to provide supervision and oversight of vegetation clearing activities



Destruction of surrounding habitats	Negative Very High	Negative Low	 Pre-construction environmental induction for all construction staff on site to ensure that basic environmental principles are adhered to. This includes awareness of no littering, appropriate handling of pollution and chemical spills, avoiding fire hazards, remaining within demarcated construction areas etc. All solid waste must be managed in accordance with the Solid Waste Management Plan. Recycling is encouraged. All construction activity and roads to be within the clearly defined and demarcated areas. Temporary laydown areas should be clearly demarcated and rehabilitated subsequent to end of use. Appropriate dust control measures to be implemented. Suitable sanitary facilities to be provided for construction staff as per the guidelines in Health and Safety Act. All hazardous materials, if any, should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner.
Displacement/emigration of avifauna community (including SCC) due to noise pollution	Negative High	Negative Low	 Noise pollution is difficult to mitigate against. No construction activity is to occur at night, as nocturnal species are highly dependent on sound and/or vocalisations for behavioural processes. If generators are to be used these must be soundproofed.
Direct mortality from persecution or poaching of avifauna species and collection of eggs	Ŭ	Negative Low	 All personnel should undergo environmental awareness training that includes educating on not poaching/persecuting species and collecting eggs.



				 Prior to commencing work each day, two individuals should traverse the working area in order to disturb any avifauna and so they have a chance to vacate the area. Any avifauna threatened by the construction activities that does not vacate the area should be removed safely by an appropriately qualified environmental officer or removal specialist.
	Direct mortality from increased vehicle and heavy machinery traffic	Ŭ	Negative Low	 All personnel should undergo environmental induction with regards to awareness about speed limits and roadkill. All construction vehicles should adhere to a speed limit of maximum 40 km/h to avoid collisions. Appropriate speed control measures and signs must be erected.
Wetland Baseline and Risk Assessment (Appendix E2)	Altered surface flow dynamics; Erosion; Alteration of sub-surface flow dynamics; Sedimentation of the water resource; Direct and indirect loss of wetland areas; Water quality impairment; Compaction; Decrease in vegetation;	Negative Medium	Negative Low	 The wetland and buffer areas must be avoided; Avoid clearance of vegetation beneath the panels; Clear vegetation in line with the 2010 Eskom Environmental Procedure Document entitled "Procedure for vegetation clearance and maintenance within overhead powerline servitudes". Make use of existing access routes as much as possible, before new routes are considered. Any selected "new" route must not encroach into the wetland areas; Limit construction activities to the dry season when storms are least likely to wash concrete and sand into wetlands. This is only where towers are within 30 m of wetland buffer areas; Ensure soil stockpiles and concrete / building sand are sufficiently safeguarded against rain wash; Mixing of concrete must under no circumstances take place in any wetland or their buffers. Scrape the area where mixing and storage of sand and concrete occurred to clean once finished;



Change of drainage	Dromptly remove all align and invasive plant species that may emerge
<u> </u>	Promptly remove all alien and invasive plant species that may emerge
patterns;	during construction (i.e. weedy annuals and other alien forbs). In line
Altering hydromorphic	with the 2010 Eskom Environmental Procedure Document entitled
properties; and	"Procedure for vegetation clearance and maintenance within overhead
properties, and	powerline servitudes" all alien vegetation along the transmission
Indirect loss of wetland	servitude should be managed in terms of the Regulation GNR.1048 of
areas	25 May 1984 (as amended) issued in terms of the Conservation of
	Agricultural Resources Act, Act 43 of 1983. By this Eskom is obliged to
	control category 1, 2 and 3 plants to the extent necessary to prevent or
	to contain the occurrence, establishment, growth, multiplication,
	propagation, regeneration and spreading such plants within servitude
	areas;
	Limit soil disturbance;
	The use of herbicides is not recommended in or near wetlands (opt for
	mechanical removal);
	• Appropriately stockpile topsoil cleared from the transmission line
	footprint;
	• Clearly demarcate the transmission line construction footprint, and
	limit all activities to within this corridor;
	 Minimize unnecessary clearing of vegetation beyond the tower
	footprints and transmission line corridors;
	• Lightly till any disturbed soil around the tower footprint to avoid
	compaction;
	A stormwater management plan must be compiled and implemented
	for the project, facilitating the diversion of clean water to the
	delineated resources;



The construction vehicles and machinery must make use of existing access routes as much as possible, before adjacent areas are considered for access;
Laydown yards, camps and storage areas must be within project area;
The contractors used for the project should have spill kits available to
ensure that any fuel or oil spills are clean-up and discarded correctly;
Any possible contamination of topsoil by hydrocarbons must be
avoided. Any contaminated soil must be treated in situ or be placed in
containers and removed from the site for disposal in a licensed facility;
It is preferable that construction takes place during the dry season to
reduce the erosion potential of the exposed surfaces;
Make sure all excess consumables and building materials / rubble is
removed from site and deposited at an appropriate waste facility;
All chemicals and toxicants to be used for the construction must be
stored within the drilling site and in a bunded area;
All machinery and equipment should be inspected regularly for faults
and possible leaks, these should be serviced off-site;
All contractors and employees should undergo induction which is to
include a component of environmental awareness. The induction is to
include aspects such as the need to avoid littering, the reporting and
cleaning of spills and leaks and general good "housekeeping";
Adequate sanitary facilities and ablutions on the servitude must be
provided for all personnel throughout the project area. Use of these
facilities must be enforced (these facilities must be kept clean so that
they are a desired alternative to the surrounding vegetation);
Have action plans on site, and training for contractors and employees
in the event of spills, leaks and other impacts to the aquatic systems;



				 Any exposed earth should be rehabilitated promptly by planting suitable vegetation (vigorous indigenous grasses) to protect the exposed soil; No dumping of material on-site may take place; and All waste generated on-site during construction must be adequately managed. Separation and recycling of different waste materials should be supported.
Visual Impact Assessment	Visual impact of construction activities on	Negative Medium	Negative Low	 Planning Retain and maintain natural vegetation immediately adjacent to the
(Appendix E4)	sensitive visual receptors in close proximity to the SPP.			development footprint. Construction
	close proximity to the SFF.			• Ensure that vegetation is not unnecessarily removed during the
				construction phase.
				 Plan the placement of laydown areas and temporary construction equipment camps in order to minimise vegetation clearing (i.e., in already disturbed areas) where possible.
				• Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.
				• Ensure that rubble, litter, etc. are appropriately stored (if it can't be removed daily) and then disposed of regularly at a licenced waste site.
				 Reduce and control dust during construction by utilising dust suppression measures.
				 Limit construction activities to between 07:00 and 18:00, where possible, in order to reduce the impacts of construction lighting.
				 Rehabilitate all disturbed areas immediately after the completion of construction work and maintain good housekeeping.
Soil and Agricultural	Loss of Land Capability	Negative Low	Negative Low	Vegetate or cover all stockpiles after stripping/removing soils



Assessment (Appendix E5) Heritage Impact Assessment (Appendix E6)	Loss or damage to sites, features or objects of cultural heritage significance	Negative Low	Negative Low	 Storage of potential contaminants should be undertaken in bunded areas All contractors must have spill kits available and be trained in the correct use thereof. All contractors and employees should undergo induction which is to include a component of environmental awareness. The induction is to include aspects such as the need to avoid littering, the reporting and cleaning of spills and leaks and general good "housekeeping". No cleaning or servicing of vehicles, machines and equipment may be undertaken in water resources. Have action plans on site, and training for contractors and employees in the event of spills, leaks and other impacts to the aquatic systems. For the current study, as no sites, features or objects of cultural significance were identified, no mitigation measures are proposed. Known sites should be clearly marked, so that they can be avoided during construction activities; The contractors and workers should be notified that archaeological sites might be exposed during the construction activities; Should any heritage artefacts be exposed during excavation, work on the area where the artefacts were discovered, shall cease immediately and the Environmental Control Officer (ECO) shall be notified as soon as possible; All discoveries shall be reported immediately to a heritage practitioner explored integer practitioner



Palaeontological Impact Assessment (Appendix E6)	Disturbance, damage or destruction of legally protected fossil heritage within the development footprint during the construction phase		Negative Low	 Under no circumstances shall any artefacts be removed, destroyed or interfered with by anyone on the site; and Contractors and workers shall be advised of the penalties associated with the unlawful removal of cultural, historical, archaeological or palaeontological artefacts, as set out in the NHRA, Section 51(1). A person or entity, e.g. the ECO, should be tasked to take responsibility for the maintenance heritage sites. In areas where the vegetation is threatening the heritage sites, e.g. growing trees pushing walls over, it should be removed, but only after permission for the methods proposed has been granted by SAHRA. A heritage official should be part of the team executing these measures. This option should be implemented when it is impossible to avoid impacting on an identified site or feature. The ECO for this project must be informed that the Adelaide Subgroup (Beaufort Group, Karoo Supergroup) has a Very High Palaeontological Sensitivity. If Palaeontological Heritage is uncovered during surface clearing and excavations the Chance Find Protocol, attached, should be implemented immediately. Fossil discoveries ought to be protected and the ECO/site manager must report to South African Heritage Resources Agency (SAHRA) (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation (recording and collection) can be carried out. Before any fossil material can be collected from the development site the specialist involved would need to apply for a collection permit from SAHRA. Fossil material must be housed in an official collection (museum or university), while all reports and fieldwork should meet
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				the minimum standards for palaeontological impact studies proposed by SAHRA (2012).
Social Impact Assessment (Appendix E7)	Creation of direct and indirect employment opportunities.	Positive Low	Positive Medium	 A local employment policy should be adopted to maximise opportunities made available to the local labour force. Labour should be sourced from the local labour pool, and only if the necessary skills are unavailable should labour be sourced from (in order of preference) the greater Masilonyana LM, Lejweleputswa DM, Free State Province, South Africa, or elsewhere. Where feasible, training and skills development programmes should be initiated prior to the commencement of the construction phase. As with the labour force, suppliers should also as far as possible be sourced locally. As far as possible local contractors that are compliant with Broad-Based Black Economic Empowerment (B-BBEE) criteria should be used. The recruitment selection process should seek to promote gender equality and the employment of women wherever possible.
	Economic multiplier effects from the use of local goods and services.	Positive Low	Positive Medium	 It is recommended that a local procurement policy is adopted to maximise the benefit to the local economy. A database of local companies, specifically Historically Disadvantaged Individuals (HDIs) which qualify as potential service providers (e.g., construction companies, security companies, catering companies, waste collection companies, transportation companies etc.) should be created and companies listed thereon should be invited to bid for project-related work where applicable. Local procurement is encouraged along with engagement with local authorities and business organisations to investigate the possibility of procurement of construction materials, goods and products from local suppliers where feasible.



Potential loss in productive farmland	Medium	Negative Low	 The proposed site for the Makoaneng SPP needs to be fenced off prior to the construction phase and all construction related activities should be confined in this fenced off area. Livestock grazing on the proposed site need to be relocated. All affected areas, which are disturbed during the construction phase, need to be rehabilitated prior to the operational phase and should be continuously monitored by the Environmental Control Officer (ECO). Implement, manage and monitor a grievance mechanism for the recording and management of social issues and complaints. Mitigation measures from the Agricultural and Soil Compliance Statement, should also be implemented.
In-migration of labourers in search of employment opportunities, and a resultant change in population, and increase in pressure on local resources and social networks, or existing services and infrastructure.		Negative Low	 Develop and implement a local procurement policy which prioritises "locals first" to prevent the movement of people into the area in search of work. Engage with local community representatives prior to construction to facilitate the adoption of the locals first procurement policy. Provide transportation for workers (from Bloemfontein, Bloemfontein and surrounds) to ensure workers can easily access their place of employment and do not need to move closer to the project site. Working hours should be kept between daylight hours during the construction phase, and / or as any deviation that is approved by the relevant authorities. Compile and implement a grievance mechanism. Appoint a Community Liaison Officer (CLO) to assist with the procurement of local labour. Prevent the recruitment of workers at the site.



			 Implement a method of communication whereby procedures to lodge complaints are set out in order for the local community to express any complaints or grievances with the construction process. Establish clear rules and regulations for access to the proposed site. Appoint a security company and implement appropriate security procedures to ensure that workers do not remain onsite after working hours. Inform local community organisations and policing forums of construction times and the duration of the construction phase. Establish procedures for the control and removal of loiterers from the construction site.
Temporary increase in safety and security concerns associated with the influx of people	Negative Medium	Negative Low	 Working hours should be kept within daylight hours during the construction phase, and / or as any deviation that is approved by the relevant authorities. Provide transportation for workers to prevent loitering within or near the project site outside of working hours. The perimeter of the construction site should be appropriately secured to prevent any unauthorised access to the site. The fencing of the site should be maintained throughout the construction period. The appointed EPC Contractor must appoint a security company to ensure appropriate security procedures and measures are implemented. Access in and out of the construction site should be strictly controlled by a security company appointed to the project. A CLO should be appointed as a grievance mechanism. A method of communication should be implemented whereby procedures to lodge complaints are set out for the local community to express any complaints or grievances with the construction process.



Impacts on daily living and movement patterns	Negative Medium	Negative Medium	 The EPC Contractor should implement a stakeholder management plan to address neighbouring farmer concerns regarding safety and security. The project proposed must prepare and implement a Fire Management Plan; this must be done in conjunction with surrounding landowners. The EPC Contractor must prepare a Method Statement which deals with fire prevention and management. All vehicles must be road worthy, and drivers must be qualified, obey traffic rules, follow speed limits and be made aware of the potential road safety issues. Heavy vehicles should be inspected regularly to ensure their road worthiness. Provision of adequate and strategically placed traffic warning signs and control measures along the R730, R30 and gravel road to warn road users of the construction activities taking place for the duration of the construction phase. Warning signs must be always visible, especially at night. Implement penalties for reckless driving to enforce compliance to traffic rules.



			 The EPC Contractor must ensure that damage / wear and tear caused by construction related traffic to the access roads is repaired before the completion of the construction phase. A method of communication must be implemented whereby procedures to lodge complaints are set out for the local community to express any complaints or grievances with the construction process.
Nuisance impact (noise and dust)	Negative Medium	Negative Low	 The movement of heavy vehicles associated with the construction phase should be timed to avoid weekends, public holidays, and holiday periods where feasible. Dust suppression measures must be implemented for heavy vehicles such as wetting of gravel roads on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers. Ensure all vehicles are road worthy, drivers are qualified and are made aware of the potential noise and dust issues. A CLO should be appointed, and a grievance mechanism implemented.
Increased risk of potential veld fires	Negative Medium	Negative Low	 A firebreak should be implemented before the construction phase. The firebreak should be controlled and constructed around the perimeters of the project site. Adequate fire-fighting equipment should be provided and readily available on site and all staff should be trained in firefighting and how to use the fire-fighting equipment. No staff (except security) should be accommodated overnight on site and the contractor should ensure that no open fires are allowed on site. The use of cooking or heating implements should only be used in designated areas.



Impacts on the sense of	Negative Low	Negative Low	 Contractors need to ensure that any construction related activities that might pose potential fire risks, are done in the designated areas where it is also managed properly. Precautionary measures need to be taken during high wind conditions or during the winter months when the fields are dry. The contractor should enter an agreement with the local farmers before the construction phase that any damages or losses during the construction phase related to the risk of fire and that are created by staff during the construction phase, are borne by the contractor. Implement mitigation measures identified in the Visual Impact
place			 Assessment (VIA) prepared for the project. Limit noise generating activities to normal daylight working hours and avoid weekends and public holidays. The movement of heavy vehicles associated with the construction phase should be timed to avoid weekends, public holidays, and holiday periods where feasible. Dust suppression measures must be implemented for heavy vehicles such as wetting of gravel roads on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers. All vehicles must be road-worthy, and drivers must be qualified and made aware of the potential road safety issues and need for strict speed limits. Communication, complaints, and grievance channels must be implemented and contact details of the CLO must be provided to the local community in the site.



Traffic Impact Assessment (Appendix E8)	Construction and maintenance of gravel roads in vicinity of the site:	Negative Low	Negative Low	 Maintenance to lower order roads can be incorporated into the schedule, especially the maintenance of the road accessing the site. The site access road would require construction at the start of the construction project to safely transport the sensitive cargo through the site. A gravel roads maintenance programme for the gravel roads on site is recommended.
	Increased traffic on haulage routes:	Negative Low	Negative Low	 The impact of the increased traffic on regional routes can be mitigated by staggering trips and scheduling so that peak hour traffic in local towns is not impacted by construction traffic.
	Increased traffic on local routes:	Negative Low	Negative Low	• The impact of the increased traffic on local routes can be mitigated by staggering trips and scheduling so that peak hour traffic in local towns is not impacted by construction traffic.



6.2.2 Impacts during the operational phase

During the operational phase the site will serve as a solar plant. The potential impacts will take place over a period of 20 - 25 years. During the operational phase the following activities will have various potential impacts on the biophysical and socio-economic environment:

- <u>Activity 11(i) (GN.R. 327):</u> "The development of facilities or infrastructure for the transmission and distribution of electricity outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts."
- <u>Activity 14 (GNR 327):</u> "The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres."
- <u>Activity 1 (GN.R 325):</u> "The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more."
- <u>Activity 10 (b)(hh) (GN.R 324):</u> "The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (b) in the Free State (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."

During the operational phase minor negative impacts are foreseen over the long term. The latter refers to at least a 20-year period. Table 6.4 summarizes the potentially most significant impacts and the mitigation measures that are proposed during the operational phase.



Table 6.4: Impacts and the mitigation measures during the operational phase

SPECIALIST STUDY	ІМРАСТ	PRE- MITIGATION RATING	POST MITIGATION RATING	SUMMARY OF MITIGATION MEASURES
Terrestrial Biodiversity, Animal and Plant	Continued fragmentation and degradation of natural habitats and ecosystems.	-	Negative Low	 Refer to Construction Phase mitigation.
Species Assessment (Appendix E1)	Continuing spread of IAP and weed species.	Negative Medium	Negative Low	
	Ongoing displacement and direct mortalities of the faunal community (including SCC) due to continued disturbance (road collisions, noise, light, dust, vibration, poaching, etc.).	Negative Medium	Negative Low	
Avifaunal Assessment (Appendix E3)	Collisions with infrastructure associated with the PV Facility	Negative High	Negative Medium	 The design of the proposed solar plant must be of a type or similar structure as endorsed by the Eskom-Endangered Wildlife Trust (EWT) Strategic Partnership on Birds and Energy, considering the mitigation guidelines recommended by Birdlife South Africa. Infrastructure should be consolidated where possible in order to minimise the amount of ground and air space used. This would involve using existing/approved pylons and associated infrastructure for different lines.



Electrocution due to Infrastructure associated with the PV Facility Negative High	 Non-polarising white tape can be used around and/or across panels to minimise reflection (Bennun et al, 2021). This is especially pertinent to waders and aquatic species that may recognise the panel array as water bodies (lake effect as described above) and collide with the panels, causing mortality. Overhead cables/lines must be fitted with industry standard bird flight diverters in order to make the lines as visible as possible to collision-susceptible species. Shaw et al (2021) demonstrated that large avifauna species mortality was reduced by 51% (95% CI: 23–68%). Recommended bird diverters such as flapping devices (dynamic device) and thickened wire spirals (static device) that increase the visibility of the lines should be fitted 5 m apart. The Inotec BFD88 bird diverter is highly recommended due to its visibility under low light conditions when most species move from roosting to feeding sites. Fencing mitigations: Top 2 strands must be smooth wire; Minimum distance between wires is 300 mm; and Place markers on fences. The design of the proposed solar plant and grid lines must be of a type or similar structure as endorsed by the Eskom-EWT Strategic Partnership on Birds and Energy, considering the mitigation guidelines recommended by Birdlife South Africa. Insulation where energised parts and/or grounded parts are covered with materials appropriate for providing incidental
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			 and vertical disconnectors, if upright insulators or horizontal disconnectors are present, these should be covered. Perch discouragers can be used such as perch guards or spikes. Considerable success achieved by providing artificial bird safe perches, which are placed at a safe distance from the energised parts (Prinsen et al, 2012).
Direct persecuti avifauna collection	on or poaching of Me species and	gative Negative Lov edium	 All personnel should undergo environmental awareness training that includes educating on not poaching/persecuting avifauna species and collecting eggs.
Direct m during procedur	maintenance Me	gative Negative Lov edium	 All personnel should undergo environmental induction with regards to awareness about speed limits and roadkill. All vehicles should adhere to a speed limit of maximum 40 km/h to avoid collisions. Appropriate speed control measures and signs must be erected.
	ment of Invasive Neg nts into disturbed Hig	gative Very Negative Lov	 An IAP Management Plan must be written and implemented for the development. The developer must contract a specialist to develop the plan and the developer is responsible for its implementation. Regular monitoring for IAP encroachment during the operation phase to ensure that no alien invasion problems have developed as result of the disturbance. This should be every 3 months during the first two years of the operation phase and every six months for the life of the project. All IAP species must be removed/controlled using the appropriate techniques as indicated in the IAP management plan.



				•
Wetland Baseline and Risk	Traffic	Negative Medium	Negative Low	
Assessment (Appendix E2)	Overland flow contamination	Negative Medium	Negative Low	
	Increased anthropogenic activities in wetland	Negative Medium	Negative Low	 Refer to Construction Phase mitigation.
	Loss of sub-surface flows	Negative Medium	Negative Low	
Visual Impact	Visual impact on observers	Negative	Negative Low	Planning
Assessment (Appendix E4)	travelling along the roads and residents at homesteads within a 1km radius of the SPP.	Medium		 Retain/re-establish and maintain natural vegetation immediately adjacent to the development footprint. Where insufficient natural vegetation exists next to the property, a 'screen' can be planted using endemic, fast growers that are water efficient. Operations Maintain general appearance of the facility as a whole.
	Visual impact on observers travelling along the roads and residents at homesteads within a 1-5km radius of the SPP.	Negative Low	Negative Low	 Planning Retain/re-establish and maintain natural vegetation immediately adjacent to the development footprint. Where insufficient natural vegetation exists next to the property, a 'screen' can be planted using endemic, fast growers that are water efficient. Operations Maintain general appearance of the facility as a whole.



Visual impact on observers			Planning
visual impact on observers travelling along the roads and residents at homesteads within a 5-10km radius of the SPP. Visual impacts of lighting at	Negative	Negative Low	 Retain/re-establish and maintain natural vegetation immediately adjacent to the development footprint. Where insufficient natural vegetation exists next to the property, a 'screen' can be planted using endemic, fast growers that are water efficient. Operations Maintain general appearance of the facility as a whole. Shield the source of light by physical barriers (walls, vegetation
night on visual receptors in close proximity to the SPP.	Medium		 Since the source of right by physical barriers (waits, vegetation etc.) Limit mounting heights of lighting fixtures, or alternatively use footlights or bollard level lights. Make use of minimum lumen or wattage in fixtures. Make use of down-lighters, or shield fixtures. Make use of low-pressure sodium lighting or other types of low impact lighting. Make use of motion detectors on security lighting. This will allow the site to remain in relative darkness, until lighting is required for security or maintenance purposes.
Glint and glare on sensitive visual receptors in close proximity to the proposed facility.	Negative Low	N/A	 No mitigation measures applicable
Visual impact of sensitive visual receptors of the proposed power line.	Negative Low	Negative Low	 Planning Retain/re-establish and maintain natural vegetation immediately adjacent to the power line servitude.



				Operations
				 Maintain the general appearance of the servitude as a whole.
	Visual impact and impacts on sense of place	Negative Medium	Negative Low	 The subjectivity towards the project in its entirety can be influenced by creating a "Green Energy" awareness campaign, educating the local community and potentially tourists on the benefits of renewable energy. This can be achieved by also hosting an 'open day' where the local community can have the opportunity to view the completed project which may enlist a sense of pride in the renewable energy project in their area. Implement good housekeeping measures
Soil and Agricultural Assessment (Appendix E5)	Loss of Land Capability	Negative Low	Negative Low	 Continuously monitor erosion on site Monitor compaction on site
Heritage Impact Assessment (Appendix E6)	Loss or damage to sites, features or objects of cultural heritage significance	Negative Low	Negative Low	 Refer to construction phase mitigation.
Social Impact Assessment (Appendix E7)	Creation of employment opportunities and skills development	Positive Low	Positive Medium	 It is recommended that local employment policy is adopted to maximise the opportunities made available to the local community. The recruitment selection process should seek to promote gender equality and the employment of women wherever possible. Vocational training programs should be established to promote the development of skills.



Development polluting, renewa infrastructure	of non- Positive able energy Medium	Positive Medium	 No mitigation measures are proposed
Loss of agricultur overall productivi		Negative Low	 The proposed mitigation measures for the construction phase should have been implemented at this stage. Mitigation measures from the Agricultural and Soil Compliance Statement, should also be implemented.
Contribution to social upliftment	LED and Positive Medium	Positive High	 A Community Needs Analysis (CNA) must be conducted to ensure that the LED and social upliftment programmes proposed by the project are meaningful. Ongoing communication and reporting are required to ensure that maximum benefit is obtained from the programmes identified, and to prevent the possibility for such programmes to be misused. The programmes should be reviewed on an ongoing basis to ensure that they are best suited to the needs of the community at the time (bearing in mind that these are likely to change over time).
Potential impacts the impact on tou		Low Positive	 Due to the extent of the project no viable mitigation measures can be implemented to eliminate the visual impact of the PV panels, but the subjectivity towards the PV panels can be influenced by creating a "Green Energy" awareness campaign, educating the local community and tourists on the benefits of renewable energy. Tourists visiting the area should be made aware of South Africa's movement towards renewable energy. This might create a positive feeling of a country moving forward in terms of environmental sustainability. This could be



			implemented by constructing a visitor's centre on the property allocated to the proposed solar farm which should be open to school fieldtrips, the local community, and tourists.
Visual impact sense of place	and impacts on Negative Low	Negative Low	 To effectively mitigate the visual impact and the impact on sense of place during the operational phase of the proposed Makoaneng SPP, it is suggested that the recommendations made in the Visual Impact Assessment (specialist study) should be followed in this regard.



6.2.3 Impacts during the decommissioning phase

The physical environment will benefit from the closure of the solar facility since the site will be restored to its natural state. Table 6.5 provides a summary of the impacts during the decommissioning phase. The decommissioning phase will however potentially result in impact on soils, pressure on existing service infrastructure, surface water and the loss of permanent employment. Skilled staff will be eminently employable, and a number of temporary jobs will also be created in the process. Decommissioning of a PV facility will leave a positive impact on the habitat and biodiversity in the area as the area will be rehabilitated to its natural state.



Table 6.5: Impacts and the mitigation measures during the decommissioning phase

SPECIALIST STUDY	ІМРАСТ	PRE- MITIGATION RATING	POST MITIGATION RATING	SUMMARY OF MITIGATION MEASURES
Terrestrial Biodiversity Assessment (Appendix E1)	Improvement of habitat through revegetation / succession over time	Positive Low	Positive Medium	 Plant vegetation species for rehabilitation that will effectively bind the loose material, and which can absorb run-off from the mining areas. Rehabilitate all the land where infrastructure has been demolished. Monitor the establishment of the vegetation cover on the rehabilitated sites to the point where it is self-sustaining. Protect rehabilitation areas until the area is self-sustaining. Diversion trenches and storm water measures must be maintained and monitored until such a stage is reached where it is no longer necessary. The mining areas must be shaped to make it safe. All the monitoring and reporting on the management and rehabilitation issues to the authorities must continue till closure of the mine is approved. Monitor and manage invader species and alien species on the invaders or aliens. Refer to mitigation measures for the construction phase needed during the closure phase that are relevant.



Avifauna Impact Assessment (Appendix E3)	Displacement of priority avian species from important habitats	Negative Low	Negative Low	None required due to low significance
	Displacement of resident avifauna through increased disturbance	Negative Low	Negative Low	 None required due to low significance
Wetland Baseline and Risk Assessment (Appendix E2)	Removal of structures, machinery and equipment Rehabilitation of site to	Negative Low	Negative Low	 Refer to construction phase mitigation measures
	agreed land use	Negative Low	Negative Low	
Social Impact Assessment (Appendix E7)	Loss of employment opportunities	Negative Low	Negative Low	 It is not expected that the facility will be decommissioned.



This section aims to address the requirements of Section 2 of the NEMA to consider cumulative impacts as part of any environmental assessment process.

7.1 Introduction

The EIA Regulations (2017) determine that cumulative impacts, "in relation to an activity, means the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may become significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities." Cumulative impacts can be incremental, interactive, sequential or synergistic. EIAs have traditionally failed to come to terms with such impacts, largely as a result of the following considerations:

- Cumulative effects may be local, regional or global in scale and dealing with such impacts requires coordinated institutional arrangements;
- Complexity dependent on numerous fluctuating influencing factors which may be completely independent of the controllable actions of the proponent or communities; and
- Project level investigations are ill-equipped to deal with broader biophysical, social and economic considerations.

Despite these challenges, cumulative impacts have been afforded increased attention in this Scoping Report and for each impact a separate section has been added which discusses any cumulative issues, and where applicable, draws attention to other issues that may contextualise or add value to the interpretation of the impact – refer to Appendix E. This chapter analyses the proposed project's potential cumulative impacts in more detail by: (1) defining the geographic area considered for the cumulative effects analysis; (2) providing an overview of relevant past and present actions in the project vicinity that may affect cumulative impacts; (3) presenting the reasonably foreseeable actions in the geographic area of consideration; and (4) determining whether there are adverse cumulative effects associated with the resource areas analysed.

The term "Cumulative Effect" has for the purpose of this report been defined as: the summation of effects over time which can be attributed to the operation of the project itself, and the overall effects on the ecosystem of the project area that can be attributed to the project and other existing and planned future projects.

7.2 Geographic Area of Evaluation

The geographic area of evaluation is the spatial boundary in which the cumulative effects analysis was undertaken. The spatial boundary evaluated in this cumulative effects analysis generally includes an area of a 30km radius surrounding the proposed development – refer to Figure 7.1 below.



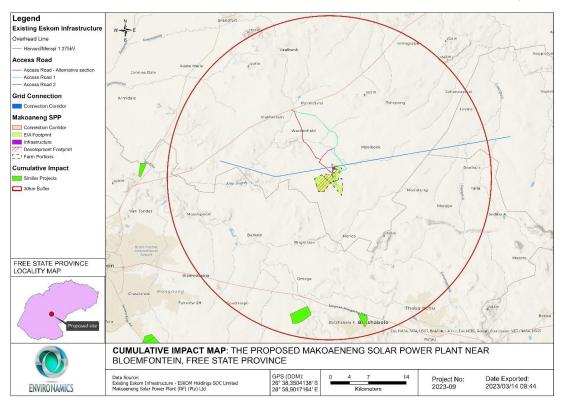


Figure 7.1: Geographic area of evaluation with utility-scale renewable energy generation sites and power lines

The geographic spread of PV solar projects, administrative boundaries and any environmental features (the nature of the landscape) were considered when determining the geographic area of investigation. It was argued that a radius of 30km would generally confine the potential for cumulative effects within this particular environmental landscape. The geographic area includes projects located within the Free State Provinces. A larger geographic area may be used to analyse cumulative impacts based on the specific temporal or spatial impacts of a resource. For example, the socio-economic cumulative analysis may include a larger area, as the construction workforce may draw from a much wider area. The geographic area of analysis is specified in the discussion of the cumulative impacts for that resource where it differs from the general area of evaluation described above.

7.3 Temporal Boundary of Evaluation

A temporal boundary is the timeframe during which the cumulative effects are reasonably expected to occur. The temporal parameters for this cumulative effects analysis are the anticipated lifespan of the proposed project, beginning in 2023 and extending out at least 20 years, which is the minimum expected project life of the proposed project. Where appropriate, particular focus is on near-term cumulative impacts of overlapping construction schedules for proposed projects in the area of evaluation.

7.4 OTHER PROJECTS IN THE AREA

7.4.1 Existing projects in the area

According to the DFFE's database, 3 solar PV plant applications have been submitted to the Department within the geographic area of investigation - refer to Table 7.1.



Table 7.1: A summary of related projects that may have a cumulative impact, in a 30 km radiusof the study area

Site	Distance from Study Area	Proposed generating capacity	DEFF Reference	EIA Process	Project status
Photovoltaic Solar Plant In Batshabelo, Mangaung Local Municipality, Free State	24km	5 MW	12/12/20/2514	BAR	Approved
Sannasos Phase 2 PV solar Project	21.5km	12 MW	14/12/16/3/3/1/615	BAR	Approved
Portion 0 Of Farm 1808 Besemkop and Portion 0 Of Farm 2962 Lejwe Located 45 Km East Of Bloemfontein.	21.5km	75 MW	14/12/16/3/3/2/360	Scoping and EIA	Approved

It is unclear whether other projects not related to renewable energy is or has been or will be constructed in this area. In general, development activity in the area is focused on industrial development, mining and agriculture. Agriculture in the area is primarily associated with cattle grazing. The next section of this report will aim to evaluate the potential for solar projects for this area in the foreseeable future.

As part of the SEA for Wind and Solar Energy in South Africa, the CSIR and the DFFE mapped the location of all EIA applications submitted within South Africa. According to this database approximately 13 applications have been submitted for renewable energy projects within the geographical area of investigation.

7.5 SPECIALIST INFORMATION ON CUMULATIVE EFFECTS

In line with the Terms of Reference (ToR) provided as part of the scoping report, specialists were asked to, where possible, take into consideration the cumulative effects associated with the proposed development and other projects which are either developed or in the process of being developed in the local area – refer to Figure 7.2 for process flow. The following sections present their findings.. The following sections present their findings.



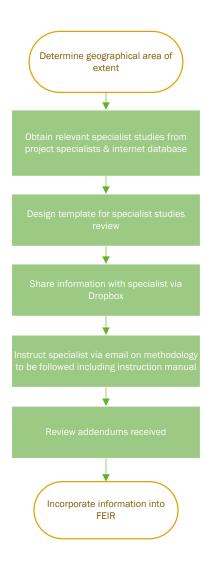


Figure 7.2: Process flow diagram for determining cumulative effects

7.5.1 Soil, Land Capability and Agricultural Potential

According to the Agriculture Compliance Statement (Appendix E4), the cumulative impact of a development is the impact that development will have when its impact is added to the incremental impacts of other past, present or reasonably foreseeable future activities that will affect the same environment. It is important to note that the cumulative impact assessment for a particular project, like what is being done here, is not the same as an assessment of the impact of all surrounding projects. The cumulative assessment for this project is an assessment only of the impacts associated with this project, but seen in the context of all surrounding impacts. It is concerned with this project's contribution to the overall impact, within the context of the overall impact. But it is not simply the overall impact itself.

The most important concept related to a cumulative impact is that of an acceptable level of change to an environment. A cumulative impact only becomes relevant when the impact of the proposed development will lead directly to the sum of impacts of all developments causing an acceptable level of change to be exceeded in the surrounding area. If the impact of the development being assessed does not cause that level to be exceeded, then the cumulative impact associated with that development is not significant.



The potential cumulative agricultural impact of importance is a regional loss (including by degradation) of future agricultural production potential. The defining question for assessing the cumulative agricultural impact is this:

What level of loss of future agricultural production potential is acceptable in the area, and will the loss associated with the proposed development, when considered in the context of all past, present or reasonably foreseeable future impacts, cause that level in the area to be exceeded?

Department of Forestry, Fisheries and the Environment (DFFE) requires compliance with a specified methodology for the assessment of cumulative impacts. This is positive in that it ensures engagement with the important issue of cumulative impacts. However, the required compliance has some limitations and can, in the opinion of this author, result in an over-focus on methodological compliance, while missing the more important task of effectively answering the above defining question.

All of these projects have the same agricultural impacts in a similar agricultural environment, and therefore the same mitigation measures apply to all.

In quantifying the cumulative impact, the area of land taken out of agricultural production (grazing) as a result of all 12 developments (total generation capacity of 562 MW) will amount to a total of approximately 1,405 hectares. This is calculated using the industry standards of 2.5 and 0.3 hectares per megawatt for solar and wind energy generation respectively, as per the Department of Environmental Affairs (DEA) Phase 1 Wind and Solar Strategic Environmental Assessment (SEA) (2015). As a proportion of the total area within a 30km radius (approximately 282,700 ha), this amounts to only 0.50% of the surface area. That is within an acceptable limit in terms of loss of land which is only suitable for grazing, of which there is no particular scarcity in the country.

As previously indicated, the proposed development poses a low risk in terms of causing soil degradation because it can be fairly easily and effectively prevented by standard best practice soil degradation control measures, as recommended and included in the EMPr of the EIA Report. If the risk for each individual development is low, then the cumulative risk is also low.

Due to all of the considerations discussed above, the cumulative impact of loss of agricultural land use will not have an unacceptable negative impact on the agricultural production capability of the area. The proposed development is therefore acceptable in terms of cumulative impact, and it is therefore recommended that it is approved.

7.5.2 Ecology

The Terrestrial Biodiversity Assessment (refer to Appendix E1) confirmed that cumulative impacts, from an ecological point of view, are those that will impact the natural faunal and floristic communities and habitats surrounding the proposed solar development, mainly by other similar developments and their associated infrastructure in its direct vicinity. As more and more similar developments occur in the direct vicinity of the currently proposed development, habitat losses and fragmentation will occur more frequently and populations of threatened, protected or other habitat specific species (both faunal and floral) will be put under increasing pressure through competition for suitable habitat. Fragmentation of habitats prevent the natural flow of ecosystem services and may have a detrimental effect on the gene pool of a species, which may lead to the loss of a population of such a species on fragmented portions. Through a development, such as the one proposed for the study area, natural habitat is totally transformed and although some vegetation cover generally returns



to these areas, microhabitats are totally destroyed and the area will probably never again be able to function without some human maintenance and management.

The cumulative impact of the solar project in the project area should all the projects be approved and developed are as follows:

- The cumulative impact on the natural ecosystems (fauna and flora) would be moderate considering that large sections of the area for development has already been degraded through agricultural activities (crop cultivation, overgrazing etc.).
- The moderate cumulative impacts are however dependant on the strict implementation of mitigation measures and monitoring during the construction, operational and decommissioning phases of the solar developments.

7.5.3 Avifauna

The Avifauna Impact Assessment (refer to Appendix E3) states It is the cumulative impacts, when considering the existing transformation of the threatened habitats to croplands and mining, in addition to the prevalence of planned solar developments, that increase the cumulative risks and, therefore, warrant mitigations.

Mitigating the cumulative impacts would require limiting the impact of Makoaneng SPP to an absolute minimum, which is not necessarily feasible but should be pursued. The mitigations to reduce cumulative impacts involve limiting the disturbance footprint (overall size), limiting human activity and noise throughout the project life, disturbing as little natural vegetation as possible, retaining the natural vegetation beneath the panels and around infrastructure, limiting the extent and width of roadways, reducing the speeds that vehicles travel, and then thoroughly rehabilitating the entire footprint back to natural grassland after decommissioning.

The proposed Makoaneng Solar Power Plant in isolation has a Negative Low impact significance. In consideration of the aforementioned information, the cumulative impact was determined to be of a Negative High significance. It is important to note that this also accounts for the relative importance of the habitats within and adjacent to the project area, in the context of the value of the regional habitat. Considering the anthropogenic activities and influences within the 30 km radius, approximately 55% of natural habitat has been lost, and as discussed above, the proposed solar developments will result in a further loss of approximately 13.9%. It is also important to consider that this projected habitat loss is only due to renewable energy developments, and further loss is a possibility with additional types of anthropogenic developments. Apart from habitat loss, one also needs to consider additional potential impacts such as light pollution, vibration, noise pollution and resource exploitation. This means that the careful spatial management and planning of the entire region must be a priority, and existing large infrastructure projects must be carefully monitored over the long term.

Despite some residual and cumulative impacts, there is no objection, from an avifaunal perspective to the development of the proposed SPP development.

7.5.4 Social Impact Assessment

The Social Impact Assessment (refer to Appendix E7) indicate that from a social impact point of view the project represents an important development opportunity for the communities



surrounding Makoaneng SPP. Should it be approved, it will not only supply the national grid with much needed clean power, but will also provide a number of opportunities for social upliftment. The cumulative impacts for each of the potential social impacts were assessed throughout the report. The most significant cumulative social impacts are both positive and negative: the community will have an opportunity to better their social and economic wellbeing, since they will have the opportunity to upgrade and improve skills levels in the area, but impacts on family and community relations may, in some cases, persist for a long period of time. Also, in cases where unplanned / unwanted pregnancies occur or members of the community are infected by an STD, specifically HIV and or AIDS, the impacts may be permanent and have long term to permanent cumulative impacts on the affected individuals and/or their families and the community.

7.5.5 Visual

The Visual Impact Assessment (refer to Appendix E4) confirmed that the construction and operation of the PV facility may increase the cumulative visual impact together with farming activities, dust on gravel roads, existing Eskom power line infrastructure and new projects, mines in the area and other proposed solar power facilities in the area. The significance of the visual impacts can only be determined once projects have been awarded preferred bidder status. However, taking into account the already disturbed visual surrounds due to extensive mining activities in the area and all the positive factors of such a development including economic factors, social factors and sustainability factors, the visual impact of this proposed development will be insignificant and is suggested that the development commence, from a visual impact point of view.

7.5.6 Heritage

The Heritage Impact Assessment (Refer to Appendix E6) concluded that from a review of available databases, publications, as well as available heritage impact assessments done for the purpose of developments in the region, it was determined that the Makoaneng SPP is located in an area with a very low presence of heritage sites and features.

The cultural heritage profile of the larger region is very low. Most frequently found are farmsteads, formal and informal burial sites. For this review, heritage sites located in urban areas have been excluded.

Heritage resources are sparsely distributed on the wider landscape with highly significant (Grade 1) sites being rare. Because of the low likelihood of finding further significant heritage resources in the area of the proposed for development and the generally low density of sites in the wider landscape the overall cumulative impacts to heritage are expected to be of generally low significance before mitigation.

For the project area, the impacts to heritage sites are expected to be of low to negligible significance.

7.5.7 Paleontology

According to the Palaeontological Impact Assessment (refer to Appendix E6), based on the SAHRIS website, the only palaeontological heritage assessments (PIAs) available for this region (Almond 2015, Brink undated, Groenewald 2013b, Millsteed 2013b) are all at desktop level with no field data. The cumulative Impacts of the area will include approved electrical facilities



within a 30 km radius of the project site. As the mentioned MTS and Powerlines and corridors are all underlain by similar geology the Impact on these developments will be similar. The Palaeontological Significance of the proposed Makoaneng SPP is rated as Low and the cumulative Impacts will thus also be Low Negative.

7.5.8 Traffic

According to the Traffic Impact Assessment (refer to Appendix E8) depending on the timing of the other nearby renewable energy projects, where construction in particular could overlap, traffic impact will increase accordingly. It should be noted that the volume of traffic is related to the specific development stage, logistics planning and development size.

The construction period for other renewable energy projects is relatively short (between 18 and 24 months), where traffic flow will vary during the construction period. It is assumed that 50% of these projects' construction periods would likely coincide with the Makoaneng SPP construction period. This additional traffic, however, will be widely dispersed and easily accommodated on the surrounding road network. In addition, the traffic impact of the operational and maintenance periods will be low/ negligible and it is also unlikely that the decommissioning of these projects will coincide with each other.

In conclusion, the cumulative impact and significance of the various nearby renewable energy projects is considered to have a low/ negligible impact and therefore no corrective measures will be required.

7.6 IMPACT ASSESSMENT

Following the definitions of the term, the "residual effects on the environment", i.e. effects after mitigation measures have been put in place, combined with the environmental effects of past, present and future projects and activities will be considered in this assessment. Also, a "combination of different individual environmental effects of the project acting on the same environmental component" can result in cumulative effects.

7.6.1 Potential Cumulative Effects

The receptors (hereafter referred to as Valued Ecosystem Components (VECs) presented in Section 6 (refer to the matrix analysis) have been examined alongside other past, present and future projects for potential adverse cumulative effects. A summary of the cumulative effects discussed are summarized in Table 7.2. There have been specific VECs identified with reference to the Solar Project (Table 6.2), which relates to the biophysical and socio-economic environments. Table 7.2 indicates the potential cumulative effects VECs and the rationale for inclusion/exclusion.

	Valued Ecosystem Components (VECs)	Rationale for Inclusion / Exclusion	Level of Cumulative Effect				
	Construction Phase						
Terres trial Biodiv	Habitat destruction & Fragmentation	The construction phase of the development and associated infrastructure will result in loss of and damage to natural habitats if the vegetation is	- Medium				

Table 7.2: Potential Cumulative Effects for the proposed project



	,	
	cleared for the development of the solar plant. Rehabilitation of some areas would be possible but there is likely to be long-term damage in large areas. Most habitat destruction will be caused during the construction phase.	
Soil erosion and sedimentation	The construction activities associated with the development may result in widespread soil disturbance and is usually associated with accelerated soil erosion. Soil erosion promotes a variety of terrestrial ecological changes associated with disturbed areas, including the establishment of alien invasive plant species, altered plant community species composition and loss of habitat for indigenous flora. The impact is considered as cumulative as it will influence the vegetation communities in the area.	- Low
Dust pollution	The environmental impacts of wind-borne dust, gases and particulates from the construction activities associated with the proposed development are primarily related to human health and ecosystem damage. Poor air quality results in deterioration of visibility and aesthetic landscape quality of the region, particularly in winter due to atmospheric inversions. The impact is considered to be cumulative as dust pollution has an impact on the surrounding environment and as the surrounding area is already impacted by mining and agricultural activities.	- Low
Spillages of harmful substances	Construction work for the proposed development will always carry a risk of soil and water pollution, with large construction vehicles contributing substantially due to oil and fuel spillages. If not promptly dealt with, spillages or accumulation of waste matter can contaminate the soil and surface or ground water, leading to potential medium/long- term impacts on fauna and flora. During the construction phase heavy machinery and vehicles would be the main contributors to potential pollution problems. The impact is considered to be cumulative as the spillages of harmful substances can have indirect impacts to the surrounding environment.	- Low
Spreading of alien invasive species	Continued movement of vehicles on and off the site during the construction phase will result in a risk of importation of alien species. Vehicles often transport many seeds, and some may be of invader species, which may become established along the access road, especially where the area is disturbed. The construction carries by far the greatest risk of alien invasive species being imported to the site, and the high levels of habitat disturbance also provide the	- Low



		, ,	
		greatest opportunities for such species to establish	
		themselves, since most indigenous species are less	
		tolerant of disturbance. The biggest risk is that seeds	
		of noxious plants may be carried onto the site along	
		with materials that have been stockpiled elsewhere	
		at already invaded sites.	
	Negative effect of human	Continued movement of vehicles on and off the site	- Low
	activities on fauna and	during the construction phase will result in a risk of	
	flora and road mortalities	importation of alien species. Vehicles often transport	
	on fauna	many seeds, and some may be of invader species,	
		which may become established along the access	
		road, especially where the area is disturbed. The	
		construction carries by far the greatest risk of alien	
		invasive species being imported to the site, and the	
		high levels of habitat disturbance also provide the	
		greatest opportunities for such species to establish	
		themselves, since most indigenous species are less	
		tolerant of disturbance. The biggest risk is that seeds	
		of noxious plants may be carried onto the site along	
		with materials that have been stockpiled elsewhere	
		at already invaded sites. The wider area is already	
		impacted by the spread of alien invasive species due	
		to agricultural and mining activities. Therefore, the	
		development will contribute towards the cumulative	
		impact of spread of alien invasive species. The impact	
		will be low as the mitigation measures proposed will	
		reduce the overall impact of the development.	
	Impact on the	The construction activities associated with the	- Medium
	characteristics of the	proposed solar power plant will potentially have an	
	watercourse	impact on the wetland areas and water levels,	
		whether it is through direct or indirect impacts. The	
		clearance of vegetation for the solar power plant will	
ent		either have a direct or indirect impact on the	
Sme		wetlands and smaller drainage channels. Loss of the	
ses		riparian and instream habitat will also result in	
As		permanent loss or displacement of the	
Wetland Baseline and Risk Assessment		invertebrates, birds and small mammals' dependant	
d R		on the wetland vegetation for feeding, shelter and	
an		breeding purposes. All functions associated with the	
ine		wetland zones and the surrounding landscape will be	
ase		compromised if mitigation measures are not applied	
I Bê		correctly. Other indirect impacts of the construction	
anc		of the solar power plant on the characteristics of the	
etl		water course include impacts on water quality and	
3		changes to the geomorphology should the	
		development cause impacts on downstream areas.	
1			
		The impact is considered to be cumulative due to	
		The impact is considered to be cumulative due to proposed development impacting on the	
		•	
		proposed development impacting on the	



	,	
Soil erosion and sedimentation	The use of heavy machinery during the construction and decommissioning phases of the development will result in the compaction of soil, resulting in decreased infiltration of rainwater and increased surface run-off volumes and velocities leading to a greater erosion risk. The hardened surfaces of the road and compacted soils of the proposed development area will also lead to an increase in surface run-off during storm events which will likely be discharged via stormwater outlet points, concentrating flows leaving the exposed areas. This can lead to erosion in the cleared areas and channel forming where culverts concentrate water on the side of the road where the river and riverine area are located. It can lead to sedimentation, in the river. The impact is considered to be cumulative due to proposed development contributing to the risk of sediment transport and erosion in the area.	- Low
Soil and water pollution (Spillages of harmful substances)	Construction work will also carry a risk of soil and water pollution, with large construction vehicles contributing substantially due to oil and fuel spillages. If not promptly dealt with, spillages or accumulation of waste matter can contaminate the soil and surface- or groundwater, leading to potential medium/long-term impacts on fauna and flora. The impact is considered to be cumulative due to proposed development contributing to the risk of soil and water pollution in the area.	- Low
Spread and establishment of alien invasive species	The construction almost certainly carries by far the greatest risk of alien invasive species being imported to the site, and the high levels of habitat disturbance also provide the greatest opportunities for such species to establish themselves, since most indigenous species are less tolerant of disturbance. The biggest risk is that seeds of noxious plants may be carried onto the site along with materials that have been stockpiled elsewhere at already invaded sites. Continued movement of personnel and vehicles on and off the site, as well as occasional delivery of materials required for maintenance, will result in a risk of importation of alien species throughout the life of the project. Furthermore, the spread of the alien invasive species through the area will be accelerated when seeds are carried by stormwater into the drainage features on the site that will cause environmental degradation and indigenous species to be displaced.	- Low



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		The wider area is already impacted by the spread of alien invasive species due to agricultural and mining activities. Therefore, the development will contribute towards the cumulative impact of spread of alien invasive species. The impact will be low as the mitigation measures proposed will reduce the overall impact of the development.	
Avifaunal Impact Assessment	Displacement of priority avian species from important habitats	The proposed Makoaneng Solar Power Plant in isolation has a Negative Low impact significance (Error! Reference source not found.). In c onsideration of the aforementioned information, the cumulative impact was determined to be of a Negative High significance (Error! Reference source not found.). It is i mportant to note that this also accounts for the relative importance of the habitats within and adjacent to the project area, in the context of the value of the regional habitat. Considering the anthropogenic activities and influences within the 30 km radius, approximately 55% of natural habitat has been lost, and as discussed above, the proposed solar developments will result in a further loss of approximately 13.9%. It is also important to consider that this projected habitat loss is only due to renewable energy developments, and further loss is a possibility with additional types of anthropogenic developments. Apart from habitat loss, one also needs to consider additional potential impacts such as light pollution, vibration, noise pollution and resource exploitation. This means that the careful spatial management and planning of the entire region must be a priority, and existing large infrastructure projects must be carefully monitored over the long term.	- High
Soil and Agricultural Assessment	Loss of agricultural land	The cumulative impact of loss of agricultural land use will not have an unacceptable negative impact on the agricultural production capability of the area. The proposed development is therefore acceptable in terms of cumulative impact, and it is therefore recommended that it is approved. Because of the negligible agricultural impact of grid connection infrastructure, its cumulative impact is also assessed as negligible.	- Low
Heritage Impact Assessme	Loss or damage to sites, features or objects of	The cultural heritage profile of the larger region is very limited. Most frequently found are stone artefacts, mostly dating to the Middle Stone Age. Sites containing such material are usually located	- Low



	cultural heritage significance	along the margins of water features (pans, drainage lines), small hills and rocky outcrops. Such surface scatters or 'background scatter' is usually viewed to be of limited significance. The colonial period manifests largely as individual farmsteads, in all its complexity, burial sites and infrastructure features such as roads, railways and power lines. For the purpose of this review, heritage sites located in urban areas have been excluded. Because of the low likelihood of finding further significant heritage resources in the relevant area	
		proposed for development and the generally low density of sites in the wider landscape the cumulative impacts to the heritage are expected to be of low significance.	
Palaeontological Impact Assessment	Disturbance, damage or destruction of legally- protected fossil heritage within the development footprints during the construction phase (impacts on well- preserved and / or rare fossils of scientific and conservation value)	A low palaeontological significance has been allocated to the proposed development. It is therefore considered that the development is deemed appropriate and feasible and will not lead to detrimental impacts on the palaeontological resources of the area.	- Low
Social Impact Assessment	Impacts of employment opportunities, business opportunities and skills development	Makoaneng SPP and the establishment of other solar power projects within the area has the potential to result in significant positive cumulative impacts, specifically with regards to the creation of a number of socio-economic opportunities for the region, which in turn, can result in positive social benefits. The positive cumulative impacts include creation of employment, skills development and training opportunities, and downstream business opportunities. The cumulative benefits to the local, regional, and national economy through employment and procurement of services are more considerable than that of Makoaneng SPP alone.	+ Medium
Social Imp	Impact with large-scale in- migration of people	While the development of a single solar power project may not result in a major influx of people into an area, the development of several projects may have a cumulative impact on the in-migration and movement of people. In addition, the fact that the project is proposed within an area characterised by good levels of solar irradiation suitable for the development of commercial solar energy facilities implies that the surrounding area is likely to be subject to considerable future applications for PV energy facilities. Levels of unemployment, and the low level of earning potential may attract individuals	- Medium



		to the area in search of better employment opportunities and higher standards of living.	
		It is exceedingly difficult to control an influx of people into an area, especially in a country where unemployment rates are high. It is therefore important that the project proponent implement and maintain strict adherence with a local employment policy in order to reduce the potential of such an impact occurring.	
Traffic Impact Study	Increase in construction vehicles	The construction and decommissioning phases are the only significant traffic generators for renewable energy projects. The duration of these phases is short term (i.e. the impact of the generated traffic on the surrounding road network is temporary and renewable energy facilities, when operational, do not add any significant traffic to the road network). Even if all renewable energy projects within the area are constructed at the same time, the roads authority will consider all applications for abnormal loads and work with all project companies to ensure that loads on the public roads are staggered and staged to ensure that the impact will be acceptable.	- Low
		Operational Phase	
ant	Habitat destruction & Fragmentation	The development and associated infrastructure will result in loss of and damage to natural habitats if the vegetation is cleared for the development of the solar plant. Rehabilitation of some areas would be possible but there is likely to be long-term damage in large areas. Most habitat destruction will be caused during the construction phase.	- Medium
Terrestrial Biodiversity Impact Assessment	Soil erosion and sedimentation	The development may result in widespread soil disturbance and is usually associated with accelerated soil erosion. Soil erosion promotes a variety of terrestrial ecological changes associated with disturbed areas, including the establishment of alien invasive plant species, altered plant community species composition and loss of habitat for indigenous flora. The impact is considered as cumulative as it will influence the vegetation communities in the area.	- Low
Terre	Dust pollution	The environmental impacts of wind-borne dust, gases and particulates from the operation and maintenance activities associated with the proposed development are primarily related to human health and ecosystem damage. Poor air quality results in deterioration of visibility and aesthetic landscape quality of the region, particularly in winter due to atmospheric inversions. The impact is considered to	- Low



		be cumulative as dust pollution has an impact on the surrounding environment and as the surrounding area is already impacted by mining and agricultural activities.	
	Spillages of harmful substances	Maintenance work for the proposed development will always carry a risk of soil and water pollution. If not promptly dealt with, spillages or accumulation of waste matter can contaminate the soil and surface or ground water, leading to potential medium/long- term impacts on fauna and flora. The impact is considered to be cumulative as the spillages of harmful substances can have indirect impacts to the surrounding environment.	- Low
	Spreading of alien invasive species	Continued movement of vehicles on and off the site will result in a risk of importation of alien species. The biggest risk is that seeds of noxious plants may be carried onto the site along with materials that have been stockpiled elsewhere at already invaded sites. Movement of vehicles will however be reduced during operation and maintenance of the facility.	- Low
	Negative effect of human activities on fauna and flora and road mortalities on fauna	Continued movement of vehicles on and off the site will result in a risk of importation of alien species. The biggest risk is that seeds of noxious plants may be carried onto the site along with materials that have been stockpiled elsewhere at already invaded sites. The wider area is already impacted by the spread of alien invasive species due to agricultural and mining activities. Therefore, the development will contribute towards the cumulative impact of spread of alien invasive species. The impact will be low as the mitigation measures proposed will reduce the overall impact of the development.	- Low
Wetland/Riparian Assessment	Impact on the characteristics of the watercourse	The operation and maintenance activities associated with the proposed solar power plant will potentially have an impact on the wetland areas and water levels, whether it is through direct or indirect impacts. All functions associated with the wetland zones and the surrounding landscape will be compromised if mitigation measures are not applied correctly. Other indirect impacts o include impacts on water quality and changes to the geomorphology should the development cause impacts on downstream areas. The impact is considered to be cumulative due to proposed development impacting on the characteristics of the watercourse.	- Medium
3	Soil erosion and sedimentation	The hardened surfaces of the road and compacted soils of the proposed development area will lead to an increase in surface run-off during storm events which will likely be discharged via stormwater outlet points, concentrating flows leaving the exposed	- Low



	1	,	
		areas. This can lead to erosion in the cleared areas and channel forming where culverts concentrate water on the side of the road where the river and riverine area are located. It can lead to sedimentation, in the river. The impact is considered to be cumulative due to proposed development contributing to the risk of sediment transport and erosion in the area.	
	Soil and water pollution (Spillages of harmful substances)	Maintenance work will also carry a risk of soil and water pollution, with large construction vehicles (where used) contributing substantially due to oil and fuel spillages. If not promptly dealt with, spillages or accumulation of waste matter can contaminate the soil and surface- or groundwater, leading to potential medium/long-term impacts on fauna and flora. The impact is considered to be cumulative due to proposed development contributing to the risk of soil and water pollution in the area.	- Low
	Spread and establishment of alien invasive species	Continued movement of personnel and vehicles on and off the site, as well as occasional delivery of materials required for maintenance, will result in a risk of importation of alien species throughout the life of the project. Furthermore, the spread of the alien invasive species through the area will be accelerated when seeds are carried by stormwater into the drainage features on the site that will cause environmental degradation and indigenous species to be displaced.	- Low
		The wider area is already impacted by the spread of alien invasive species due to agricultural and mining activities. Therefore, the development will contribute towards the cumulative impact of spread of alien invasive species. The impact will be low as the mitigation measures proposed will reduce the overall impact of the development.	
Visual Impact Assessment	Visual intrusion of the development on observers within the area	The operation and maintenance of the facility will create visual instruction on observers that utilise and travel through the area, including travellers using the local roads	- Medium
	·	Decommissioning Phase	
General	Generation of waste	During the decommissioning of the facility waste will be generated that will need to be disposed of where recycling and re-use is not available. This may lead to pressure on waste disposal facilities in the area.	- Medium



7.7 CONCLUSION

This chapter of the Scoping Report addressed the cumulative environmental effects of the construction, operation and decommissioning project phases to be further assessed as part of the EIA Phase. The information to date has shown that no significant adverse residual impacts are likely. However, cumulative impacts could arise as other similar projects are constructed in the area.

The potential most significant cumulative impacts relate to:

- > <u>Cumulative effects during construction phase:</u>
 - Habitat destruction and fragmentation (- Medium)
 - Impact on the characteristics of the watercourse (- Medium)
 - Displacement of priority avian species from important habitats (- Medium)
 - Loss of important avian habitats (- Medium)
 - Impacts of employment opportunities, business opportunities and skills development (+ Medium)
 - Impact with large-scale in-migration of people (- Medium)
- Cumulative effects during the operational phase:
 - Habitat destruction and fragmentation (- Medium)
 - Impacts on the characteristics of the watercourse (- Medium)
 - Visual intrusion (- Medium)
- > <u>Cumulative effects during the decommissioning phase:</u>
 - Generation of waste (- Medium)

The cumulative impact for the proposed development is medium to low and no high, unacceptable impacts related to the project are expected. Considering the extent of the project and information presented in section 7 of this report, it can be concluded that the cumulative impacts will not result in large scale changes and impacts on the environment.

Photovoltaic solar energy technology is a clean technology which contributes toward a betterquality environment. The proposed project will contribute to local economic growth by supporting industry development in line with provincial and regional goals and ensuring advanced skills are drawn to the Free State Province. No cumulative impacts with a high residual risk have been identified.

In terms of the desirability of the development of sources of renewable energy therefore, it may be preferable to incur a higher cumulative loss in such a region as this one (where the landscape has already experienced degradation), than to lose land with a higher environmental value elsewhere in the country.



8 PLAN OF STUDY FOR EIA

Appendix 2. (2) A scoping report (...) must include -(i) a plan of study for undertaking the EIA process to be undertaken, including-(i) a description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity; (ii) a description of the aspects to be assessed as part of the EIA process; (iii) aspects to be assessed by specialists; (iv) a description of the proposed method of assessing the environmental aspects, including a description of the proposed method of assessing the environmental aspects including aspects to be assessed by specialists; (v) a description of the proposed method of assessing duration and significance; (vi) an indication of the stages at which the competent authority will be consulted; (vii) particulars of the public participation process that will be conducted during the EIA process; and (viii) a description of the tasks that will be undertaken as part of the EIA process; (ix) identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored.

This section aims to address the following requirements of the regulations:

8.1 INTRODUCTION

This section gives a brief outline of the Plan of Study for EIA (PoSEIA) and the tasks that will be undertaken and the anticipated process to meet the objectives for the EIA phase. The approach to the EIA is to focus on those key issues identified for the preferred alternative. This will ensure that the EIA focuses on the most significant impacts and in the process save time and resources.

8.2 ANTICIPATED OUTCOMES OF THE IMPACT ASSESSMENT PHASE

The purpose of the EIA phase is to assess issues identified in the scoping phase and will include an environmental management program (EMPr). The EMPr will provide information on the proposed activity and the manner in which potential impacts will be minimized or mitigated. The EIA report will comply with Appendix 3 and will:

- Determine the policy and legislative context within which the activity is located and document how the proposed activity complies with and responds to the policy and legislative context;
- Describe the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location;



- Identify the location of the development footprint within the preferred site based on an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects of the environment;
- Determine the
 - (i) nature, significance, consequence, extent, duration and probability of the impacts occurring to inform identified preferred alternatives; and
 - (ii) degree to which these impacts-
 - (aa) can be reversed;
 - (bb) may cause irreplaceable loss of resources, and
 - (cc) can be avoided, managed or mitigated;
- Identify the most ideal location for the activity within the preferred site based on the lowest level of environmental sensitivity identified during the assessment;
- Identify, assess, and rank the impacts the activity will impose on the preferred location through the life of the activity;
- Identify suitable measures to avoid, manage or mitigate identified impacts; and
- Identify residual risks that need to be managed and monitored.

8.3 TASKS TO BE UNDERTAKEN

The following sections describe the tasks that will be undertaken as part of the EIA Phase of the process.

8.3.1 **Project Description**

Further technical and supporting information will be gathered to provide a more detailed project description. This will include a detailed and finalised site layout plan that will be compiled once the areas of sensitivity identified in this Scoping Report have been confirmed by the specialists.

8.3.2 Consideration of alternatives

The following project alternatives will be investigated in the EIR:

• <u>Design/Layout alternatives</u>: In terms of the actual layout of the proposed PV plant which will only be assessed for the preferred site alternative. A draft facility layout is included in Figure H.

8.3.3 Compilation of Environmental Impact Report (EIR)

A Draft EIR will be compiled to meet the content requirements as per Appendix 3 of GNR. 326 of the EIA Regulations (as amended) and will also include a draft Environmental Management Programme containing the aspects contemplated in Appendix 4 of GNR326. The Generic EMPr for overhead electricity transmission and distribution infrastructure and the Generic EMPr for the development of the associated substation infrastructure for transmission and distribution of



electricity as per Government Notice 435, which were published in Government Gazette 42323 on 22 March 2019, will also be included in the Draft EIR.

8.3.4 Public participation

All registered I&APs and relevant State Departments will be given the opportunity to review the Draft Environmental Impact Report in accordance with Regulation R326. A minimum of 30 days commenting period will be allowed and all stakeholders and I&APs will be given an opportunity to forward their written comments within that period. All issues identified during this 30-day review and comment period will be documented and compiled into a Comments and Response Report to be included as part of the Final EIR to be submitted to the DFFE for decision-making on the Application for Environmental Authorisation.

8.4 ASPECTS ASSESSED

Table 8.1 below provides a summary of the aspects that have been assessed. The aspects are also linked to specialist information obtained.

Aspects	Potential impacts	Specialist studies / technical information
Construction of the PV Solar facility	 Impacts on the fauna and flora 	Terrestrial Biodiversity Survey and Avifauna Impact Assessment
lacinty	 Wetlands and riparian areas 	Wetland Impact Assessment
	 Impacts on agricultural potential (soils) 	Soil and Agricultural Compliance Statement
	 Impacts associated with the geology of the site 	Geotechnical Assessment
	 Impacts on existing services infrastructure 	Confirmation from the Local Municipality
	 Temporary employment, impacts on health and safety 	Social Impact Assessment
	 Impacts on heritage resources 	Heritage Impact Assessment and Palaeontological Impact Assessment
Operation of the PV Solar facility	 Impacts on the fauna and flora 	Terrestrial Biodiversity Survey and Avifauna Impact Assessment
	 Wetlands and riparian areas 	Wetland Impact Assessment

Table 8.1: Aspects assessed



	 Impacts on agricultural potential (soils) 	Soil and Agricultural Compliance Statement
	 Impacts associated with the geology of the site 	Geotechnical Assessment
	 Increased consumption of water 	Confirmed volumes to be provided by the Applicant
	 Pressure on existing services infrastructure 	Confirmation from the Local Municipality
	Visual Impact	Visual Impact Assessment
	 Provision of employment and generation of income for the local community 	Social Impact Assessment
Decommissioning of the PV Solar facility	 Impacts on the fauna and flora 	Terrestrial Biodiversity Survey and Avifauna Impact Assessment
lacinty	 Socio-economic impacts (loss of employment) 	Social Impact Assessment
Cumulative Impacts	 Cumulative biophysical impacts resulting from similar developments in close proximity to the proposed activity. 	All independent specialist studies results to be considered and analised by the EAP

8.4.1 Specialist studies

Based on the initial descriptions of potential environmental impacts or aspects (refer to Table 6.2), specialists have been subcontracted to assess the potential impacts that may be significant. The specialist studies assess impacts on both the social and the biophysical environment and also help in identifying ways that can help to mitigate the envisaged impacts. The following specialist studies have been included to address the potentially most significant impact as identified during the scoping phase – refer to Table 6.2:

- <u>Geotechnical report</u>: To determine whether the geotechnical conditions at the site are favorable for the development and construction of a solar PV plant.
- <u>Heritage Impact Assessment</u>: To determine whether the proposed activity will impact on any heritage or archeological artifacts.
- <u>Terrestrial Biodiversity</u>, Plant and Animal Species Impact Assessment: To determine what the impact of the proposed activity will be on the ecology (fauna and flora) in the area.
- <u>Wetland /Riparian Impact Assessment:</u> To determine the impact of the proposed activity on the wetlands present on Remaining Extent of the Farm Kalkoenkrans No. 225.



- <u>Avifauna Impact Assessment:</u> To determine what the impacts of the proposed activity will have on the birds (avifauna) in the area.
- <u>Visual Impact Assessment</u>: To determine to what extent the proposed activity will be visually intrusive to the surrounding communities or other receptors.
- <u>Soil and Agricultural Compliance Statement</u>: To determine how the proposed activity will impact on soil and agricultural resources.
- <u>Social Impact Assessment:</u> To determine how the proposed activity will impact on the socio-economic environment.
- <u>Palaeontological Impact Assessment:</u> To determine the impacts on palaeontological resources.
- <u>Traffic Impact Assessment:</u> To determine the impacts on road users on long haul routes and roads around the project area.

8.4.2 Terms of reference for specialist studies

Specialists in their field of expertise will consider baseline data and identify and assess impacts according to predefined rating scales (section 8.5). Specialists will also suggest optional or essential ways in which to mitigate negative impacts and enhance positive impacts. Further, specialists will, where possible, take into consideration the cumulative effects associated with this and other projects which are either developed or in the process of being developed in the local area. The specialist is reminded to follow the latest DFFE protocols.

The results of these specialist studies have been integrated into the draft Scoping Report. The general requirements proposed for the inputs are presented below and specialists are encouraged to comment and provide input on these. The Terms of Reference (ToR) for each specialist study are include as Appendix E10 to the report.

General Requirements

Specialists' reports must comply with Appendix 6 of GNR. 326 published under sections 24(5), and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended and whereby the following are to be included:

- The details of-
 - the specialist who prepared the report; and
 - the expertise of that specialist to compile a specialist report including a curriculum vitae;
- A declaration that the specialist is independent in a form as may be specified by the competent authority;
- An indication of the scope of, and the purpose for which, the report was prepared;
 - An indication of the quality and age of base data used for the specialist report;
 - A description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;



- The duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment;
- A description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used;
- Details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;
- An identification of any areas to be avoided, including buffers;
- A map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;
- A description of any assumptions made and any uncertainties or gaps in knowledge;
- A description of the findings and potential implications of such findings on the impact of the proposed activity, or activities;
- Any mitigation measures for inclusion in the EMPr;
- Any conditions for inclusion in the environmental authorisation;
- Any monitoring requirements for inclusion in the EMPr or environmental authorisation;
- A reasoned opinion-
 - \circ whether the proposed activity, activities or portions thereof should be authorised;
 - regarding the acceptability of the proposed activity or activities; and
 - if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan;
- A description of any consultation process that was undertaken during the course of preparing the specialist report;
- A summary and copies of any comments received during any consultation process and where applicable all responses thereto; and
- Any other information requested by the competent authority.

In addition to the above, specialists are expected to:

• Review the Scoping Report, with specific reference to the Comments and Response Report to familiarize with all relevant issues or concerns relevant to their field of expertise;



- In addition to the impacts listed in the Scoping Report, identify any issue or aspect that needs to be assessed and provide expert opinion on any issue in their field of expertise that they deem necessary in order to avoid potential detrimental impacts;
- Assess the degree and extent of all identified impacts (including cumulative impacts) that the preferred project activity and its proposed alternatives, including that of the no-go alternative, may have;
- Identify and list all legislation and permit requirements that are relevant to the development proposal in context of the study;
- Reference all sources of information and literature consulted; and
- Include an executive summary to the report.

8.5 METHOD OF ENVIRONMENTAL ASSESSMENT

The environmental assessment aims to identify the various possible environmental impacts that could results from the proposed activity. Different impacts need to be evaluated in terms of its significance and in doing so highlight the most critical issues to be addressed.

Significance is determined through a synthesis of impact characteristics which include context and intensity of an impact. Context refers to the geographical scale i.e. site, local, national or global whereas intensity is defined by the severity of the impact e.g. the magnitude of deviation from background conditions, the size of the area affected, the duration of the impact and the overall probability of occurrence. Significance is calculated as shown in Table 8.2.

Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The total number of points scored for each impact indicates the level of significance of the impact.

8.5.1 Impact Rating System

Impact assessment must take account of the nature, scale and duration of impacts on the environment whether such impacts are positive or negative. Each impact is also assessed according to the project phases:

- planning
- construction
- operation
- decommissioning

Where necessary, the proposal for mitigation or optimisation of an impact should be detailed. A brief discussion of the impact and the rationale behind the assessment of its significance should also be included. The rating system is applied to the potential impacts on the receiving environment and includes an objective evaluation of the mitigation of the impact. In assessing the significance of each impact the following criteria is used:



Table 8.2: The rating system

NATURE

Include a brief description of the impact of environmental parameter being assessed in the context of the project. This criterion includes a brief written statement of the environmental aspect being impacted upon by a particular action or activity.

GEOGRAPHICAL EXTENT

This is defined as the area over which the impact will be experienced.

1	Site	The impact will only affect the site.
2	Local/district	Will affect the local area or district.
3	Province/region	Will affect the entire province or region.
4	International and National	Will affect the entire country.

PROBABILITY

This describes the chance of occurrence of an impact.

1	Unlikely	The chance of the impact occurring is extremely low
		(Less than a 25% chance of occurrence).
2	Possible	The impact may occur (Between a 25% to 50% chance
		of occurrence).
3	Probable	The impact will likely occur (Between a 50% to 75%
		chance of occurrence).
4	Definite	Impact will certainly occur (Greater than a 75% chance
		of occurrence).

DURATION

This describes the duration of the impacts. Duration indicates the lifetime of the impact as a result of the proposed activity.

1	Short term	The impact will either disappear with mitigation or will be mitigated through natural processes in a span shorter than the construction phase $(0 - 1 \text{ years})$, or the impact will last for the period of a relatively short construction period and a limited recovery time after construction, thereafter it will be entirely negated $(0 - 2 \text{ years})$.
2	Medium term	The impact will continue or last for some time after the construction phase but will be mitigated by direct human action or by natural processes thereafter (2 – 10 years).



3	Long term	The impact and its effects will continue or last for the entire operational life of the development, but will be mitigated by direct human action or by natural processes thereafter (10 – 30 years).
4	Permanent	The only class of impact that will be non-transitory. Mitigation either by man or natural process will not occur in such a way or such a time span that the impact can be considered indefinite.

INTENSITY/ MAGNITUDE

2

Describes the severity of an impact.

1	Low	Impact affects the quality, use and integrity of the
		system/component in a way that is barely perceptible.
2	Medium	Impact alters the quality, use and integrity of the system/component but system/component still continues to function in a moderately modified way and maintains general integrity (some impact on integrity).
3	High	Impact affects the continued viability of the system/ component and the quality, use, integrity and functionality of the system or component is severely impaired and may temporarily cease. High costs of rehabilitation and remediation.
4	Very high	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component permanently ceases and is irreversibly impaired. Rehabilitation and remediation often impossible. If possible rehabilitation and remediation often unfeasible due to extremely high costs of rehabilitation and remediation.
REVERSIBILITY		
This describes the degree to which an impact can be successfully reversed upon completion of the proposed activity.		
1	Completely reversible	The impact is reversible with implementation of minor mitigation measures.



3	Barely reversible	The impact is unlikely to be reversed even with intense mitigation measures.	
4	Irreversible	The impact is irreversible and no mitigation measures exist.	
IRREF	PLACEABLE LOSS OF RESOURCES	l	
This d activi	-	ources will be irreplaceably lost as a result of a proposed	
1	No loss of resource	The impact will not result in the loss of any resources.	
2	Marginal loss of resource	The impact will result in marginal loss of resources.	
3	Significant loss of resources	The impact will result in significant loss of resources.	
4	Complete loss of resources	The impact is result in a complete loss of all resources.	
CUM	CUMULATIVE EFFECT		
This describes the cumulative effect of the impacts. A cumulative impact is an effect which in itself may not be significant but may become significant if added to other existing or potential impacts emanating from other similar or diverse activities as a result of the project activity in question.			
1	Negligible cumulative impact	The impact would result in negligible to no cumulative effects.	
2	Low cumulative impact	The impact would result in insignificant cumulative effects.	
3	Medium cumulative impact	The impact would result in minor cumulative effects.	

4	High cumulative impact	The impact would result in significant cumulative
		effects

SIGNIFICANCE

Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The calculation of the significance of an impact uses the following formula: (Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity.

The summation of the different criteria will produce a non-weighted value. By multiplying this value with the magnitude/intensity, the resultant value acquires a weighted characteristic which can be measured and assigned a significance rating.

Points	Impact significance rating	Description
6 to 28	Negative low impact	The anticipated impact will have negligible negative effects and will require little to no mitigation.



6 to 28	Positive low impact	The anticipated impact will have minor positive effects.
29 to 50	Negative medium impact	The anticipated impact will have moderate negative effects and will require moderate mitigation measures.
29 to 50	Positive medium impact	The anticipated impact will have moderate positive effects.
51 to 73	Negative high impact	The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact.
51 to 73	Positive high impact	The anticipated impact will have significant positive effects.
74 to 96	Negative very high impact	The anticipated impact will have highly significant effects and are unlikely to be able to be mitigated adequately. These impacts could be considered "fatal flaws".
74 to 96	Positive very high impact	The anticipated impact will have highly significant positive effects.

8.6 CONSULTATION WITH THE COMPETENT AUTHORITY

Consultation with the competent and commenting authorities will continue throughout the duration of impact assessment phase. The authorities will also comment on whether they deem it necessary to conduct additional specialist studies other than what is proposed already in this PoSEIA. On-going consultation will include:

- Submission of the Final EIR following a 30-day public review period (and consideration of comments received).
- Arrangements will be made to discuss the report with the Environmental Officer responsible for the project during the review period, where required.



This Draft Scoping Report is aimed at identifying the 'scope' of the EIA that will be conducted in respect of the activity for which authorization is being applied for. It can be concluded that:

- The scoping phase complied with the specifications set out in Regulations 21 and Appendix 2 of GNR326.
- > All key consultees have been consulted as required by the Regulations 39 to 44.

Based on the contents of the report the following key environmental issues were identified which need to be addressed in the EIA report:

- Impacts during construction phase:
 - Direct habitat destruction (- Medium)
 - Habitat Fragmentation (- Medium)
 - o Impact on the characteristics of the watercourse (- Medium)
 - Creation of direct and indirect employment opportunities (+ Medium)
 - Economic multiplier effects from the use of local goods and services (+ Medium)
 - Impacts on daily living patterns (- Medium)
- Impacts during the operational phase:
 - Habitat destruction and fragmentation (- Medium)
 - Displacement of priority avian species from important habitats (- Medium)
 - Impact on the characteristics of the watercourse (- Medium)
 - o Creation of employment opportunities and skills development. (+ Medium)
 - Development of non-polluting, renewable energy infrastructure. (+ Medium)
 - Contribution to LED and social upliftment (+ High)
- Impacts during the decommissioning phase:
 - Improvement of habitat through revegetation / succession over time (+ Medium)
- Cumulative biophysical impacts resulting from similar development in close proximity to the proposed activity.

No fatal flaws or impacts of a high significance has been identified to be associated with the proposed development. The issues identified will be addressed in more detail in the EIA report as part of the EIA Phase.

Considering the environmental sensitive features present within the development footprint, as identified in this Scoping Report, the Applicant has proposed a draft facility layout which considers



these features, and thereby aim to avoid any direct impact on these features. As part of this optimisation process associated infrastructure, including grid connection infrastructure, has been shifted outside of these sensitive environmental features and areas. The draft layout will be further assessed and optimised as part of the EIA Phase of the project to ensure that the development footprint within the affected property is appropriate from an environmental perspective, and thereby avoids the present sensitive environmental features and areas as identified by the independent specialists. Refer to Figure H for the draft layout proposed for development.

The EAP therefore recommends that:

The scoping report be approved after which the EIA process, as required by Regulations 23 to 24 may commence.

We trust that the Department of Forestry, Fisheries and the Environment find the report in order and we eagerly await your comments in this regard.





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