


Naos Solar PV Project Three: Comments and Response Report (Appendix C6)

Comments received prior to the release of the Draft Basic Assessment Report and during the initial Public Participation 30-day comment period

Organisation	Person	Issue or comment raised (see Appendix C4 & C5 of the Draft Basic Assessment report)	Addressing or incorporation of issue or comment
I&AP	Asaph Mathibeng	<p>In an email dated 21 July 2022, the following request was submitted by the I&AP:</p> <p>We supply construction materials (aggregates, readymixed concrete and gypsum) in the area and have operations in Orkney, Stilfontein and Potchefstroom.</p> <p>Kindly register us in the process and forward the documents as they become available.</p>	<p>Environamics responded in an email dated 25 July 2022. It was confirmed that the details of the I&AP have been registered on the project database (Appendix C3 of the DBAR). Furthermore, it was confirmed that the I&AP will receive project related information and documents as they become available.</p>
Free State Department of Agriculture and Rural Development	Schalk Burger	<p>In an email dated 30 August 2022, the following comment and information was provided by the Department following notification of the BA process and submission of the BID:</p> <p>Lisa this is the only area we will consider for recommendation (see image below). The other portions are high potential agricultural value and some are irrigation land. I hope this will help. Only non arable land will be considered for development of Solar.</p>	<p>The comment provided by the Department has been considered by the Agricultural specialist and the Agricultural Economist in the Soils and Agricultural Impact Assessment (Appendix D4) and the Agricultural Economic Assessment (Appendix D9) of the draft BA Report.</p> <p>The specialists have advised that the development of Naos Solar PV Project Three within the proposed location will be acceptable considering the current challenges and limitations experienced in the agricultural sector and the opportunities presented for agricultural expansion by the development of the proposed development.</p>

			<p>The draft BA Report has been distributed to the Free State Department of Agriculture and Rural Development for consideration and comment.</p> <p>Any comments received from the Department during the 30-day review and comment period will be included and addressed as part of the final BA Report.</p>
Landscape Dynamics	Susanna Nel	<p>The following request was received via email on 25 August 2022 following Notification of the Basic Assessment process:</p> <p>Could you please provide us with a Google Earth file (kmz/kml) of the projects, access roads and grid connections?</p>	<p>Environamics responded on 01 September 2022 and indicated that a meeting is to be held between the Applicants for the proposed Naos Solar PV Project Three and the Mercury Cluster Development (a development proposed adjacent to the south west). This meeting was held on 15 September 2022 – meeting minutes included in Appendix C4 of the draft BA Report.</p>

			<p>It was also indicated that a KMZ file was not available for distribution at the time.</p> <p>The draft BA Report has been distributed to the I&AP at the commencement of the 30-day review and comment period.</p>
Eskom	John Geeringh	<p>The following email was received on 26 August 2022 in response to the Notification of the Basic Assessment Process:</p> <p>Please send me a KMZ file of the affected properties, development areas and proposed grid connection. Please find attached Eskom requirements for work at or near Eskom infrastructure and servitudes, as well as the RE development setbacks guideline.</p>	<p>Environamics responded via email on 01 September 2022 and submitted to the I&AP a KMZ file of the affected property, site and grid connection corridors for the project under assessment.</p> <p>It was also indicated that the requirements for works at or near Eskom infrastructure, as well as the Eskom Renewable Energy setbacks guidelines have been submitted to the Applicant.</p>
Mvelaphande Trading	Chris Schutte	<p>The following email was received on 30 August 2022 in response to the Notification of the Basic Assessment Process:</p> <p>Hereby do we acknowledge your proposed project.</p> <p>For future reference please quote OVJN0529-22.</p>	<p>The acknowledgement of the proposed project and reference number are noted.</p>
Energy Group	Jason Fairhurst	<p>The following email was received on 09 September 2022 in response to the Notification of the Basic Assessment Process:</p> <p>Can you register me as an IAP please?</p>	<p>Environamics responded in an email dated 09 September 2022. It was confirmed that the details of the I&AP have been registered on the project database (Appendix C3 of the DBAR). Furthermore, it was confirmed that the I&AP will</p>

		I am from Energy Group and I am involved with other Solar PV projects in the area.	receive project related information and documents as they become available.
Savannah Environmental	Ansone` Esterhuizen	<p>The following email was received on 08 September 2022 in response to the Notification of the Basic Assessment Process:</p> <p>Good day I would like to register as an I&AP on this project</p> <p>Will you please provide me with the draft reports and appendixes for comments</p>	<p>Environamics responded in an email dated 09 September 2022. It was confirmed that the details of the I&AP have been registered on the project database (Appendix C3 of the DBAR). Furthermore, it was confirmed that the I&AP will receive project related information and documents as they become available, including notification of the availability of the 30-day review and comment period of the draft BA Report.</p> <p>It was indicated that the draft BA Report was not available at the time. The BID was however distributed to the I&AP.</p>
Savannah Environmental	Nicolene Venter	<p>The following email was received on 08 September 2022 in response to the Notification of the Basic Assessment Process:</p> <p>It will be appreciated if Environamics can share the .KMZ file with us.</p>	<p>Environamics responded in an email dated 09 September 2022. It was indicated that spatial data could not be shared at the time.</p> <p>The I&AP was referred to the BID which was distributed for the project on 25 August, which includes an indication of the properties that will be affected by the proposed development.</p>
Mvelaphande Trading	Chris Schutte	The following comments were received from the I&AP in an email dated 22 September 2022, and a letter dated 22 September 2022:	The approval from the I&AP is noted. Furthermore, the Applicant takes note of the requirements to be complied with prior to

		<p>With reference to your above- mentioned application, I hereby confirm that the proposed work installation is approved in terms of Section 29 of the Electronic Communications Act No. 36 of 2005 as amended.</p> <p>No infrastructure of our Client (Openserve) will be affected by this proposal. We did our utmost to ensure that we indicate our route as accurate as possible and should you discover any of our cables that is not on the sketch please stop and contact us immediately to arrange a site meeting. In the event that our cables are exposed and damaged/stolen by a third party the damages will be repaired at the customer's account. Please make use of pilot holes in order not to damage our infrastructure. Therefore, any damages occurred during construction of work will be repaired at the customer's account.</p> <p>Although we are not affected by this proposal Mr Wynand Du Plessis must be contacted at telephone number 081 362 2186. Two (2) weeks prior to commencement of proposed work.</p> <p>Approval of the proposed route is valid for six months. If construction has not yet commenced within this period, then the file must be resubmitted for approval.</p>	<p>construction and the validity period of the approval.</p>
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South African Radio Astronomy Observatory (SARAO)	Selaelo Matlhane	<p>The following comments were received in a letter dated 25 August 2022:</p> <p>This letter is in response to the proposed solar development and its possible impact on the Square Kilometre Array radio telescopes.</p> <p>SARAO has undertaken a high-level impact assessment and based on the information provided it was determined that the project represents a low risk of interference to the SKA radio telescope with a compliance surplus of 361.55 dBm/Hz. As such, we do not have any objection to the proposed development.</p>	<p>It is noted that SARAO has no objection to the proposed Naos Solar PV Project Three, and that the development will pose a low risk in terms of interference.</p>
South African Heritage Resources Agency (SAHRA)	Sityhilelo Ngcatsha	<p>The following interim comment was received in a letter dated 12 September 2022:</p> <p>As the proposed development is undergoing an EA Application process in terms of the National Environmental Management Act, 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, No 28 of 2002 (MPRDA) (As amended), it is incumbent on the developer to ensure that a Heritage Impact Assessment (HIA) is done as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). This must include an archaeological component, palaeontological component and any other applicable heritage components. The HIA must be conducted</p>	<p>It must be noted that the proposed development does not trigger activities in terms of the Mineral and Petroleum Resources Development Act, No 28 of 2002 (MPRDA) (As amended). The proposed development is for the construction and operation of a solar energy facility and associated infrastructure, including grid connection infrastructure.</p> <p>It is confirmed that a Heritage Impact Assessment has been undertaken for Naos Solar PV Project Three, and has been distributed to all I&APs, including SAHRA for a 30-day review and comment period. The archaeology component is included in Appendix D5 and the palaeontological component is included in</p>

		<p>as part of the EA Application in terms of NEMA and the NEMA EIA Regulations.</p> <p>The archaeological component of the HIA should follow the SAHRA 2007 Minimum Standards: Archaeological Component of Impact Assessment Report. The quickest process to follow for the archaeological component would be to contract a qualified archaeologist (see www.asapa.co.za or www.aphp.org.za).</p> <p>The proposed development area is located mostly within an area of very high sensitivity and high, moderate and insignificant sensitivity in terms of palaeontological resources as per the SAHRIS PalaeoSensitivity map. As such, a field based Palaeontological Impact Assessment (PIA) must be undertaken by a qualified palaeontologist (See https://www.palaeosa.org/heritage-practitioners.html for a list of qualified palaeontologists). The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.</p> <p>Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.</p> <p>The NEMA EIA documents and appendices must be submitted at the start of the public review periods in order for an</p>	<p>Appendix D6 of the draft Basic Assessment Report.</p> <p>The minimum standards have been followed as part of the HIA, as per Appendix D5 and D6 of the draft Basic Assessment Report.</p> <p>A field based Palaeontological Impact Assessment (PIA) has been undertaken and is included as Appendix D6 of the draft Basic Assessment Report that has been made available for a 30-day review and comment period.</p> <p>It is confirmed that all heritage resources have been assessed for the proposed development.</p> <p>The draft Basic Assessment has been submitted to SAHRA via the SAHRIS online portal at the commencement of the 30-day review and comment period.</p>
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		informed comment to be issued that can be incorporated into the final reports for submission to the competent authority.	
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