

PROPOSED UP TO 240MW ONDERSTEPSPOORT SOLAR 1 PHOTOVOLTAIC PROJECT NORTH WEST OF RUSTENBURG,
NORTH WEST PROVINCE

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DFFE REFERENCE No.: 14/12/16/3/3/2/2319

DRAFT

JUNE 2023

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TITLE AND APPROVAL PAGE

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EXECUTIVE SUMMARY

A. PROJECT BACKGROUND AND MOTIVATION

Electricity generation sources need to be diversified to ensure security of supply and reduction in the carbon footprint created by the current heavy reliance of South Africa (SA) on coal to produce electricity. Onderstepoort Solar 1 (Pty) Ltd (the “Applicant”) has proposed the development of the 240MW Onderstepoort Solar 1 Photovoltaic (PV) Project near Rustenburg, in the North West Province (the “Project”).

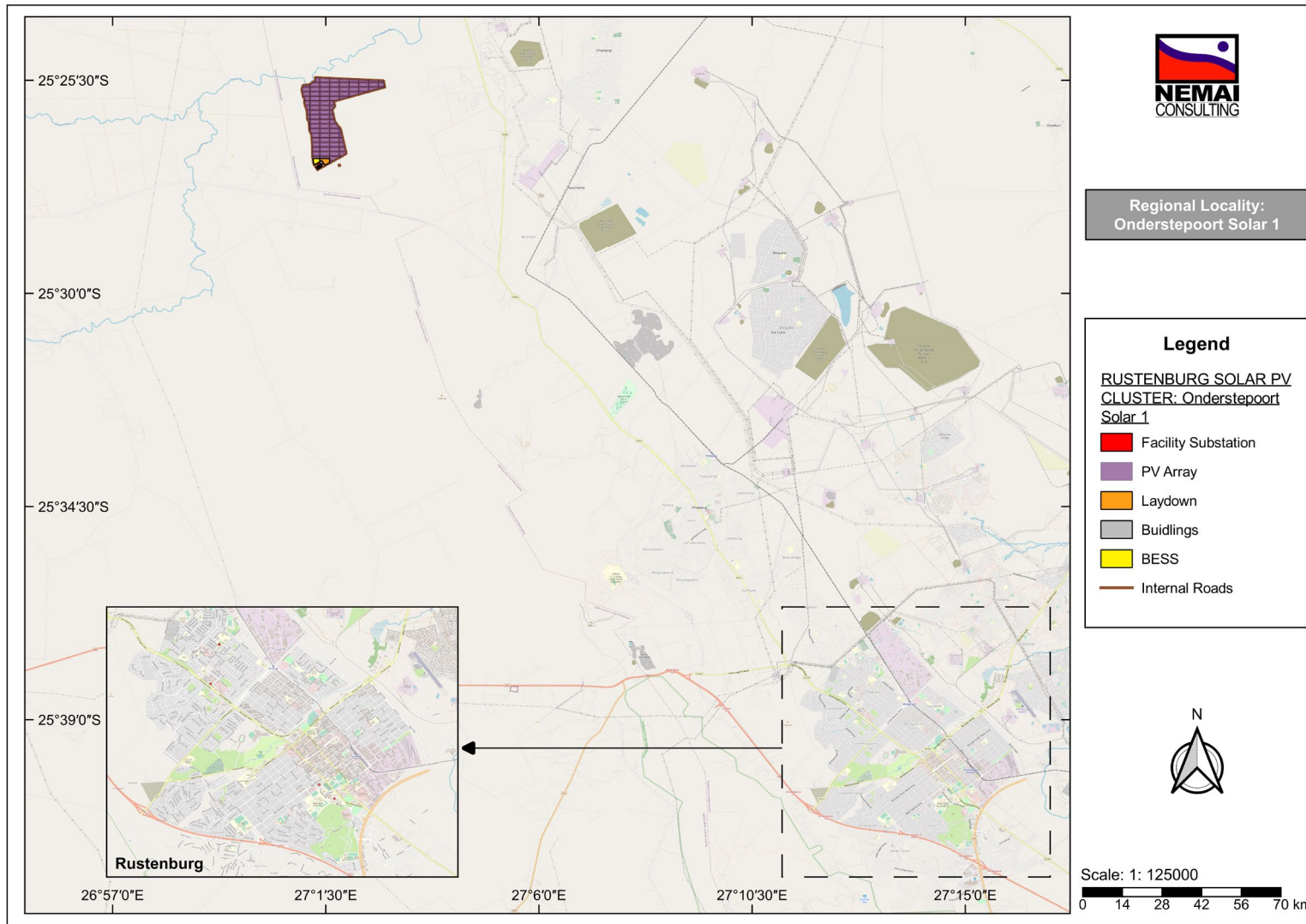
The electricity generated by the Project will be transferred via 132 kV powerlines from the Eskom collector switching station, located adjacent to the facility substation, to the Ngwedi Main Transmission Substation (MTS). A separate environmental process is being undertaken to assess the grid connection infrastructure required to evacuate the energy from the Eskom collector switching station to the national grid.

The Applicant intends to bid for the current and future Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) bid windows and/or other renewable energy markets within SA.

This document serves as the **draft Environmental Impact Assessment (EIA) Report** for the proposed Project.

B. PROJECT LOCATION

The Project Area is located approximately 10km west of Rasimone and 30km north-west of Rustenburg’s central business district (CBD) and, falls within Ward 1 of the Rustenburg Local Municipality, in the North West Province. The site can be accessed via Lindleyspoort Road (off the R565) which runs along the southern boundary of the site. The project footprint covers a combined area of approximately 400 hectares (ha).



Regional locality map

C. LEGISLATION AND GUIDELINES CONSIDERED

Pertinent legislation that has possible bearing on the proposed Project from an environmental perspective is briefly discussed in this EIA Report.

The relationship between the Project and the following key pieces of environmental legislation is also explained:

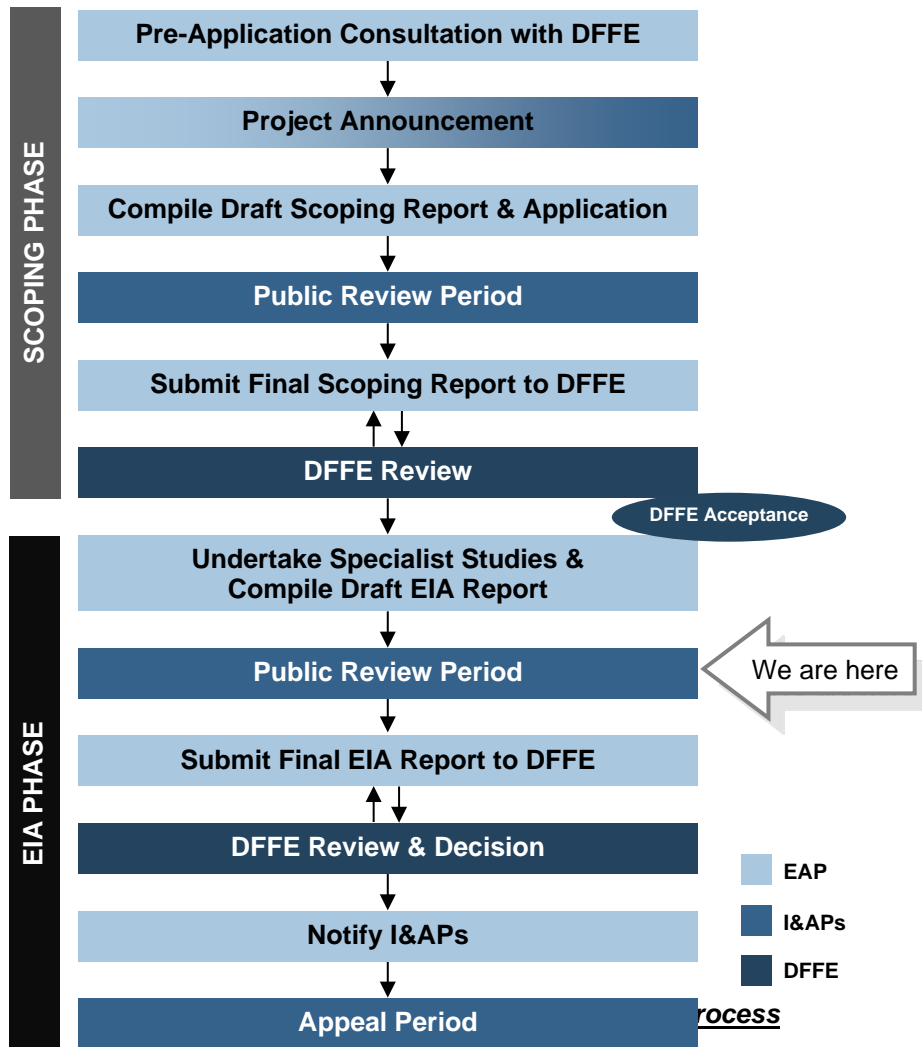
- National Environmental Management Act (Act No. 107 of 1998) (NEMA);
- National Environmental Management: Waste Act (Act No. 59 of 2008);
- National Water Act (Act No. 36 of 1998);
- National Environmental Management Air Quality Act (Act No. 39 of 2004);
- National Environmental Management: Biodiversity Act (Act No. 10 of 2004); and
- National Heritage Resources Act (Act No. 25 of 1999).

D. SCOPING AND EIA PROCESS

The process for seeking Environmental Authorisation for the Project under the NEMA is being undertaken in accordance with the EIA Regulations of 2014 (as amended), published under Government Notice (GN) No. 982 in Gazette No. 38282 of 4 December 2014 and amended by GN 326 of 7 April 2017 published in Gazette No. 40772 (the “EIA Regulations”). In terms of NEMA, the lead decision-making authority for the environmental assessment is the Department of Forestry, Fisheries and the Environment (DFFE). Nema Consulting was appointed as the independent Environmental Assessment Practitioner (EAP) to undertake the environmental assessment for the proposed Project.

Based on the types of activities involved the requisite environmental assessment for the Project is a Scoping and Environmental Impact Reporting (S&EIR) process. An outline of the process is provided in the diagram to follow.

DFFE accepted the Scoping Report and Plan of Study for the EIA on 25 May 2023, which allowed the commencement of the EIA phase.



E. PROJECT'S TECHNICAL DESCRIPTION

The technical details of the proposed Project are captured below.

Technical details of the proposed Project

No.	Component	Description / Dimensions	
		Alternative 1	Alternative 2
1.	Height of PV panels	Up to 5.5 m	Up to 5.5 m
2.	Area of PV Array	Up to approximately 469.5 ha	Monofacial or Bifacial PV panels, mounted on either fixed-tilt, single-axis tracking, and/or double-axis tracking systems. Up to 390 ha
3.	Area occupied by substations	Up to 1 ha	Up to 1 ha

No.	Component	Description / Dimensions	
		Alternative 1	Alternative 2
4.	Capacity of on-site substation	The facility substation will collect the power from the facility and transform it from medium voltage (up to 33kV) to high voltage (132 kV).	The facility substation will collect the power from the facility and transform it from medium voltage (up to 33kV) to high voltage (132 kV).
5.	BESS	Area up to ± 5 ha	Area up to ± 5ha
6.	Area occupied by both permanent and construction laydown areas	Temporary: Up to 7 ha Permanent: Up to 1 ha (located within the area demarcated for temporary construction laydown)	Temporary: Up to 7ha Permanent: Up to 1 ha (located within the area demarcated for temporary construction laydown)
7.	Area occupied by buildings	Up to 1.5 ha	Up to 1.5 ha
8.	Length of internal roads	Up to 33 km	Up to 33 km
9.	Width of internal roads	The internal roads will be up to 6 m wide. The access roads will be up to 8 m wide.	The internal roads will be up to 6 m wide. The access roads will be up to 8 m wide.
10.	Proximity to grid connection	±5-6 km	Approximately 5 - 6 km
11.	Height of fencing	Up to 3.5 m	Up to 3.5m
12.	Type of fencing	Type will vary around the site, welded mesh, palisade and electric fencing	Type will vary around the site, welded mesh, palisade and electric fencing

The EIA Report provides an overview of the components of the proposed Solar PV Facility, as well as the BESS and grid connection. It further explains the project life-cycle, as well as the resources required to execute the Project.

The alternatives under consideration for the Project include layout alternatives and the no-go option.

F. PROFILE OF THE RECEIVING ENVIRONMENT

The EIA Report provides a general description of the status quo of the receiving environment in the Project Area. This serves to provide the context within which the assessment was conducted and allows for an appreciation of sensitive environmental features and possible receptors of the effects of the proposed Project.

The receiving environment is explained in terms of the following:

- | | |
|---|---|
| <input type="checkbox"/> Land Use | <input type="checkbox"/> Agriculture |
| <input type="checkbox"/> Climate | <input type="checkbox"/> Air quality |
| <input type="checkbox"/> Geology and Soil | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Hydrogeology | <input type="checkbox"/> Historical and Cultural Features |
| <input type="checkbox"/> Topography | <input type="checkbox"/> Planning |
| <input type="checkbox"/> Surface Water | <input type="checkbox"/> Existing Structures and Infrastructure |
| <input type="checkbox"/> Flora & Fauna | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Socio-Economic Environment | <input type="checkbox"/> Health |

G. SPECIALIST STUDIES

The specialist studies ‘triggered’ by the nature of the proposed development and its receiving environment, which aimed at addressing the key issues and compliance with legal obligations, include the following:

1. Freshwater Aquatic Impact Assessment;
2. Terrestrial Biodiversity Compliance Statement;;
3. Avifaunal Impact Assessment;
4. Agricultural Compliance Statement;
5. Phase 1 Cultural Heritage Impact Assessment;
6. Paleontological Impact Assessment;
7. Visual Impact Assessment;
8. Traffic Impact Assessment; and
9. Social Impact Assessment.

The information obtained from the respective specialist studies was incorporated into the EIA Report in the following manner (amongst others):

- The information was used to complete the description of the receiving environment in a more detailed and site-specific manner;
- A summary of each specialist study is provided, focusing on the approach to each study, key findings and conclusions drawn;
- The specialists’ impacts assessments, and the identified mitigation measures, were included in the overall project impact assessment;
- The evaluations performed by the specialists on the alternatives of the Project components were taken into consideration in the identification of the most favourable options; and
- Salient recommendations made by the specialists were taken forward to the final Conclusions.

H. IMPACT ASSESSMENT

The EIA Report assessed the pertinent environmental impacts that could potentially be caused during the pre-construction, construction and operational phases of the Project.

Impacts were identified as follows:

- Impacts associated with listed activities contained in the EIA Regulations’ Listing Notices;
- Impacts identified during the Scoping phase;
- An appraisal of the Project’s activities and components;
- An assessment of the receiving biophysical, social, economic and built environments;
- Findings from specialist studies;
- Issues highlighted by environmental authorities; and
- Comments received during public participation from Interested and Affected Parties (I&APs).

The impacts and the proposed management measures are discussed on a qualitative level and thereafter quantitatively assessed to ultimately determine the significance of the impacts. The assessment considered

impacts before and after mitigation, where in the latter instance the residual impact following the application of the mitigation measures is evaluated.

The proposed mitigation of the impacts associated with the Project includes specific measures identified by the technical team (including engineering solutions) and environmental specialists, stipulations of environmental authorities and environmental best practices. The Environmental Management Programme (EMPr) for the PV Site and Generic EMPr's for the Power Line and Substation provides a comprehensive list of mitigation measures for specific elements of the Project, which extends beyond the impacts evaluated in the body of the EIA Report.

The implications of the "no-go option" are also assessed. The "no go option" was considered in light of the motivation as well as the need and desirability of the overall Project. Should the proposed Project not go ahead, any potentially significant environmental issues associated with the Project would be irrelevant and the status quo of the local receiving environment would not be affected by the Project-related activities. The objectives of this Project would, however, not be met. This will *inter alia* mean that the Project's intended benefits will not materialise. The "no-go option" is thus not preferred.

From a cumulative impact perspective, there no known renewable energy applications, within a 30km radius of the Project's PV Site according to the REEA database. There are two other renewable energy applications in close proximity to the Project i.e. Onderstepoort Solar 2 and Rhino Solar. These two applications will be submitted concurrently with the Onderstepoort Solar 1 application. Cumulative impacts in relation to the Project were assessed individually in the EIA Report and mitigation measures were developed for each of the impact categories.

Other aspects identified in terms of cumulative impacts included:

- Traffic-related impacts in terms of the local road network;
- The cumulative impacts with regards to habitat loss and fragmentation, as well as cumulative risks to protected fauna and flora species;
- The clearance of vegetative cover for the Project's development footprint will exacerbate erosion and the proliferation of invasive alien species;
- Increase in the dust levels during the construction phase;
- Construction of the proposed facilities along with construction activities of other developments in the Project Area could potentially increase noise impacts on surrounding land uses;
- The proposed Project is expected to increase the cumulative visual impact experienced by the identified sensitive receptors;
- Problems associated with the influx of employment seekers; and
- Positive cumulative economic effects from the construction of multiple developments in the area.

I. ANALYSIS OF ALTERNATIVES

Based on the recommendations of the specialists, technical considerations, feedback from I&APs and the comparison of the impacts, PV Layout Alternative 2 was identified as the Best Practicable Environmental Option (BPEO).

J. PUBLIC PARTICIPATION

The EIA Report provides the details of the following tasks undertaken as part of the public participation process:

- Maintaining the database of I&APs;
- Review period for the draft EIA Report;
- Notification of review of the draft EIA Report;
- Means of accessing the draft EIA Report; and
- Commenting on the draft EIA Report.

K. CONCLUSIONS

The following key tasks were undertaken during the EIA phase for the proposed Project:

- The specialist studies identified in the Plan of Study for the EIA were undertaken and the findings were incorporated into the EIA Report in terms of understanding the environmental status quo and sensitive features, assessing the potential impacts and establishing concomitant mitigation measures, as well as identifying the preferred alternatives;
- Potentially significant impacts pertaining to the pre-construction, construction and operational phases of the Project were identified and assessed, and mitigation measures were provided; and
- Alternatives for achieving the objectives of the proposed activity were considered, and the BPEO was identified. The “no-go” option is not supported when considering the implications of not implementing the Project.

Attention is drawn to specific sensitive environmental features for which mitigation measures are included in the EIA Report and EMPr’s. A combined sensitivity map overlaid with the Project’s BPEO is also provided. Key environmental features that contributed toward the sensitive areas shown in the map included wetlands and their associated buffer zones, as well as avifaunal habitats, as determined by the relevant specialist studies.

An Environmental Impact Statement is also provided, which includes highlighting key findings from the EIA, which may also influence the conditions of the Environmental Authorisation (if granted).

With the selection of the BPEO, the adoption of the mitigation measures included in the EIA Report and the dedicated implementation of the EMPr’s, it is believed that the significant environmental aspects and impacts associated with this Project can be suitably mitigated. With the aforementioned in mind, it can be concluded that there are no fatal flaws associated with the Project and that authorisation can be issued, based on the findings of the specialists and the impact assessment, through the compliance with the identified environmental management provisions.

AMENDMENTS PAGE

Date	Nature of Amendment	Amendment No.	Signature
June 2023	Draft for Review by Authorities and the Public	0	

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LIST OF ACRONYMS & ABBREVIATIONS

AC	Alternating Current
AEL	Atmospheric Emission Licence
ASAPA	Association for Southern African Professional Archaeologists
BESS	Battery Energy Storage System
BPEO	Best Practicable Environmental Option
CBA	Critical Biodiversity Area
CBD	Central Business District
CCTV	Closed-Circuit Television
COD	Commercial Operation Date
CPV	Concentrated Photovoltaics
C&R	Comments and Response
CR	Critically Endangered
CRR	Comments and Responses Report
DALRRD	Department of Agriculture, Land reform and Rural Development
DARD	Department of Agriculture and Rural Development
DEA	Department of Environmental Affairs
DEA&DP	Department of Environmental Affairs and Development Planning
DEAT	Department of Environmental Affairs and Tourism
DEL	Department of Employment and Labour
DEDECT	Department of Economic Development, Environment, Conservation and Tourism
DFFE	Department of Forestry, Fisheries and the Environment
DC	Direct Current
DD	Data Deficient
DMRE	Department of Mineral Resources and Energy
DoE	Department of Energy
DPRT	Department of Police, Roads and Transport
DWAF	Department of Water Affairs and Forestry
DWS	Department of Water and Sanitation
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EIS	Ecological Importance and Sensitivity
EHS	Environmental, Health, and Safety
EMF	Electromagnetic Field
EMPr	Environmental Management Programme
EMS	Environmental Management System
EN	Endangered
ESA	Ecological Support Area
FEPA	Freshwater Ecosystem Priority Area
GHG	Greenhouse Gas
GIS	Geographical Information System

GN	Government Notice
GPS	Global Positioning System
GVA	Gross Value Added
H	High
HGM	Hydrogeomorphic
HIA	Heritage Impact Assessment
HIV/AIDS	Human Immunodeficiency Virus, Acquired Immunodeficiency Syndrome
HV	High Voltage
I&APs	Interested and Affected Parties
IBA	Important Bird & Biodiversity Area
IDP	Integrated Development Plan
IFC	International Finance Corporation
IPP	Independent Power Producer
IRP	Integrated Resource Plan
IUCN	International Union for Conservation of Nature
KZN	KwaZulu-Natal
L	Low
LC	Least Concern
LO	Likelihood of Occurrence
LSU	Large Livestock Unit
M	Moderate
MMM	Mangaung Metropolitan Municipality
MOSS	Metropolitan Open Space System
MP	Moderately Protected
Na	Sodium
NA	Not Assessed
NaS	Sodium-Sulphur
NEMA	National Environmental Management Act (No. 107 of 1998)
NEM:AQA	National Environmental Management: Air Quality Act (Act No. 39 of 2004)
NEM:BA	National Environmental Management: Biodiversity Act (Act 10 of 2004)
NEM:PAA	National Environmental Management: Protected Areas Act (Act No. 57 of 2003)
NEM:WA	National Environmental Management: Waste Act (Act No. 59 of 2008)
NHRA	National Heritage Resources Act (Act No. 25 of 1999)
NWDPRT	North West Department of Police, Roads and Transport
NWHRA	North West Heritage Resources Authority
NP	Not Protected
NPAES	National Protected Area Expansion Strategy
NT	Near Threatened
NWA	National Water Act (Act No. 36 of 1998)
NWCS	National Wetland Classification System
OG	Ordinary Game
OHS	Occupational Health and Safety
ONA	Other Natural Area

PES	Present Ecological State
PG	Protected Game
POSA	Plants of Southern Africa
PP	Poorly Protected
PPE	Personal Protective Equipment
PS	Performance Standards
PSSA	Palaeontological Society of South Africa
PV	Photovoltaic
REDZ	Renewable Energy Development Zones
REEA	Renewable Energy EIA Application
REIPPPP	Renewable Energy Independent Power Producer Procurement Programme
RFI	Radio Frequency Interference
S	Sulphur
S&EIR	Scoping and Environmental Impact Reporting
SA	South Africa
SABAP2	South African Bird Atlas Project 2
SACAA	South African Civil Aviation Authority
SACAD	South Africa Conservation Areas Database
SACNASP	South African Council for Natural Scientific Professions
SAHRA	South African Heritage Resources Agency
SAHRIS	South African Heritage Resources Information System
SANBI	South African National Biodiversity Institute
SANRAL	South African National Roads Agency
SANS	South African National Standard
SAPAD	South African Protected Areas Database
SARAO	South African Radio Astronomy Observatory
SCC	Species of Conservation Concern
SDF	Spatial Development Framework
SEA	Strategic Environmental Assessment
SOTER	Soil and Terrain
Spp.	Species
STD	Sexually Transmitted Disease
STI	Sexually Transmitted Infection
ToR	Terms of Reference
UFS	University of the Free State
VAC	Visual Absorption Capacity
VU	Vulnerable
WMA	Water Management Area
WP	Well Protected

UNITS OF MEASUREMENT

%	Percentage
°C	Degrees Celsius
ha	Hectare
hz	Hertz
km	Kilometre
kV	Kilovolt
l/s	Litres per second
m	Metre
m²	Square metre
mm	Millimetre
MVA	Megavolt Amperes
MW	Megawatt
MWh	Megawatt hour
V	Volt

1 PURPOSE OF THIS DOCUMENT

Nemai Consulting was appointed by Onderstepoort Solar 1 (Pty) Ltd (the “Applicant”) to conduct the Environmental Impact Assessment (EIA) for the **proposed up to 240MW Onderstepoort Solar 1 Photovoltaic Project north west of Rustenburg, North West Province** (the “Project”).

The EIA is being undertaken according to the process prescribed in the EIA Regulations of 2014, published under Government Notice (GN) No. 982 in Gazette No. 38282 of 4 December 2014 and amended by GN 326 of 7 April 2017 published in Gazette No. 40772 (the “EIA Regulations”). The EIA Regulations were promulgated in terms of the National Environmental Management Act (Act No. 107 of 1998) (NEMA). This document serves as the **draft EIA Report** for the proposed Project.

To date, the Scoping phase of the overall environmental assessment for the Project has been completed. The final Scoping Report and Plan of Study for the EIA were approved by the Department of Forestry, Fisheries and the Environment (DFFE) on 25 May 2023. DFFE is the competent authority to decide on the application in terms of NEMA.

According to the EIA Regulations, the objectives of the EIA process are to undertake the following, through a consultative process:

- 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 development footprint on the approved site as contemplated in the accepted Scoping Report.
- Identify the location of the development footprint within the approved site as contemplated in the accepted Scoping Report 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 -
 - Nature, significance, consequence, extent, duration and probability of the impacts occurring to inform identified preferred alternatives.
 - Degree to which these impacts -
 - Can be reversed;
 - May cause irreplaceable loss of resources; and
 - Can be avoided, managed or mitigated.
- Identify the most ideal location for the activity within the development footprint of the approved site as contemplated in the accepted Scoping Report based on the lowest level of environmental sensitivity identified during the assessment.
- Identify, assess, and rank the impacts the activity will impose on the development footprint on the approved site as contemplated in the accepted scoping report through the life of the activity.
- Identify suitable measures to avoid, manage or mitigate identified impacts.
- Identify residual risks that need to be managed and monitored.

The draft EIA Report will be made available to Interested and Affected Parties (I&APs) for a 30-day review period from **28 June 2023 until 28 July 2023**. All comments that are received will be addressed in the final

EIA Report and will also be included in the Comments and Responses Report. The final EIA Report will then be submitted to the DFFE for review and decision-making.

DOCUMENT ROADMAP

As a minimum, this EIA Report aims to satisfy the requirements stipulated in Appendix 3 of the EIA Regulations. **Table 1** below presents the document's composition in terms of the aforementioned regulatory requirements.

Table 1: EIA Report Roadmap

Chapter	Title	Correlation with GN No. R. 982	GN No. R. 982 Description
1	Purpose of this Document	–	–
2	Document Roadmap	–	–
3	Project Background and Motivation	–	–
4	Project Location	3(1)(b)	The location of the development footprint of the activity on the approved site as contemplated in the accepted Scoping Report, including: <ul style="list-style-type: none"> (i) the 21 digit Surveyor General code of each cadastral land parcel; (ii) where available, the physical address and farm name; and (iii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties.
		3(1)(c)	A plan which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale, or, if it is - <ul style="list-style-type: none"> (i) a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; and (ii) on land where the property has not been defined, the coordinates within which the activity is to be undertaken.
5	Legislation and Guidelines Considered	3(1)(e)	A description of the policy and legislative context within which the development is located and an explanation of how the proposed development complies with and responds to the legislation and policy context.
6	Scoping and EIA Process	3(1)(a)	Details of- <ul style="list-style-type: none"> o the EAP who prepared the report; and o the expertise of the EAP, including a curriculum vitae.
		3(1)(u)	An indication of any deviation from the approved scoping report, including the plan of study, including- <ul style="list-style-type: none"> (i) any deviation from the methodology used in determining the significance of potential environmental impacts and risks; and (ii) a motivation for the deviation.
		3(1)(v)	Any specific information that may be required by the competent authority.
7	Assumptions and Limitations	3(1)(p)	A description of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed.

Chapter	Title	Correlation with GN No. R. 982	GN No. R. 982 Description
8	Need and Desirability	3(1)(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 development footprint within the approved site as contemplated in the accepted Scoping Report.
9	Project Description	3(1)(d)	A description of the scope of the proposed activity, including- (i) all listed and specified activities triggered and being applied for; and (ii) a description of the associated structures and infrastructure related to the development.
		3(1)(g)	A motivation for the preferred development footprint within the approved site as contemplated in the accepted scoping report.
		3(1)(h)(i)	A full description of the process followed to reach the proposed development footprint within the approved site as contemplated in the accepted scoping report, including: (i) details of the development footprint alternatives considered.
		3(1)(h)(ix)	If no alternative development footprints for the activity were investigated, the motivation for not considering such.
		3(1)(t)	Where applicable, details of any financial provisions for the rehabilitation, closure, and ongoing post decommissioning management of negative environmental impacts.
10	Alternatives	3(1)(h)(i)	Details of the development footprint alternatives considered.
11	Profile of the Receiving Environment	3(1)(h)(iv)	The environmental attributes associated with the development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects.
12	Summary of Specialist Studies	3(1)(k)	Where applicable, a summary of the findings and recommendations of any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final assessment report.
13	Impact Assessment	3(1)(h)(v)	The impacts and risks identified including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts- (i) can be reversed; (ii) may cause irreplaceable loss of resources; and (iii) can be avoided, managed or mitigated.
		3(1)(h)(vi)	The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks.
		3(1)(h)(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.
		3(1)(h)(viii)	The possible mitigation measures that could be applied and level of residual risk.

Chapter	Title	Correlation with GN No. R. 982	GN No. R. 982 Description
		3(1)(i)	A full description of the process undertaken to identify, assess and rank the impacts the activity and associated structures and infrastructure will impose on the preferred development footprint on the approved site as contemplated in the accepted scoping report through the life of the activity, including - (i) a description of all environmental issues and risks that were identified during the environmental impact assessment process; and (ii) an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures.
		3(1)(j)	An assessment of each identified potentially significant impact and risk, including- (i) cumulative impacts; (ii) the nature, significance and consequences of the impact and risk; (iii) the extent and duration of the impact and risk; (iv) the probability of the impact and risk occurring; (v) the degree to which the impact and risk can be reversed; (vi) the degree to which the impact and risk may cause irreplaceable loss of resources; and (vii) the degree to which the impact and risk can be mitigated.
		3(1)(m)	Based on the assessment, and where applicable, recommendations from specialist reports, the recording of proposed impact management outcomes for the development for inclusion in the Environmental Management Programme (EMPr) as well as for inclusion as conditions of authorisation.
14	Analysis of Alternatives	3(1)(h)(ix)	If no alternative development locations for the activity were investigated, the motivation for not considering such.
		3(1)(h)(x)	A concluding statement indicating the location of the preferred alternative development footprint within the approved site as contemplated in the accepted Scoping Report.
		3(1)(n)	The final proposed alternatives which respond to the impact management measures, avoidance, and mitigation measures identified through the assessment.
15	Public Participation – EIA Phase	3(1)(h)(ii)	Details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs.
16	EIA Conclusions	3(1)(l)	An environmental impact statement which contains- (i) a summary of the key findings of the environmental impact assessment; (ii) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred development footprint on the approved site as contemplated in the accepted scoping report

Chapter	Title	Correlation with GN No. R. 982	GN No. R. 982 Description
			indicating any areas that should be avoided, including buffers; and (iii) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.
		3(1)(o)	Any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation.
		3(1)(q)	A reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation.
17	References	-	-
Appendix A	Locality Maps	3(1)(c)	A plan which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale.
Appendix E	Specialists' Reports	R23(5)	Specialist Reports containing all information set out in Appendix 6 of GN No. R. 982 of 4 December 2014 (as amended).
Appendix H	EMPr's	R23(4)	Environmental Management Programme containing all information set out in Appendix 4 of GN No. R. 982 of 4 December 2014 (as amended).
Appendix G	Comments and Responses Report	3(1)(h)(ii)	Details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs.
		3(1)(h)(iii)	A summary of the issues raised by Interested and Affected Parties (IAPs), and an indication of the manner in which the issues were incorporated, or the reasons for not including them.
Appendix K	Oath of Environmental Assessment Practitioner	3(1)(s)	An undertaking under oath or affirmation by the EAP in relation to: (i) the correctness of the information provided in the reports; (ii) the inclusion of comments and inputs from stakeholders and IAPs; (iii) the inclusion of inputs and recommendations from the specialist reports where relevant; and (iv) any information provided by the EAP to IAPs and any responses by the EAP to comments or inputs made by IAPs.
	N/A	3(1)(r)	Where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required and the date on which the activity will be concluded and the post construction monitoring requirements finalised.
	N/A	3(1)(w)	Any other matters required in terms of section 24(4)(a) and (b) of the Act.

2 PROJECT BACKGROUND AND MOTIVATION

The South African Government ratified the Paris Agreement in 2016, and thereby showed the country's commitment to contribute to the global effort to address the challenge of climate change. Electricity generation sources need to be diversified to ensure security of supply and reduction in the carbon footprint created by the current heavy reliance of South Africa (SA) on coal to produce electricity. The electricity demand is increasing in SA, and in order to match that demand there is a need to supply a diversified power generation that includes renewable energy technologies. These technologies include solar, wind, small utility scale hydro, biomass, biogas and energy storage that the Department of Mineral Resources and Energy (DMRE) intends to develop and implement as identified in the approved Integrated Resource Plan (IRP) 2019.

The Applicant has proposed the development of the 240MW Onderstepoort Solar 1 PV Project north west of Rustenburg, in the North West Province.

The Applicant intends to bid for the current and future Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) bid windows and/or other renewable energy markets within SA.

3 PROJECT LOCATION

3.1 Location of the Project relative to Solar Yield Area

The location of the Project in relation to SA's PV power potential is shown in **Figure 1** below. The Project Area is considered to have favourable solar irradiation levels, which makes it ideal for the production of solar power via PV Panels.

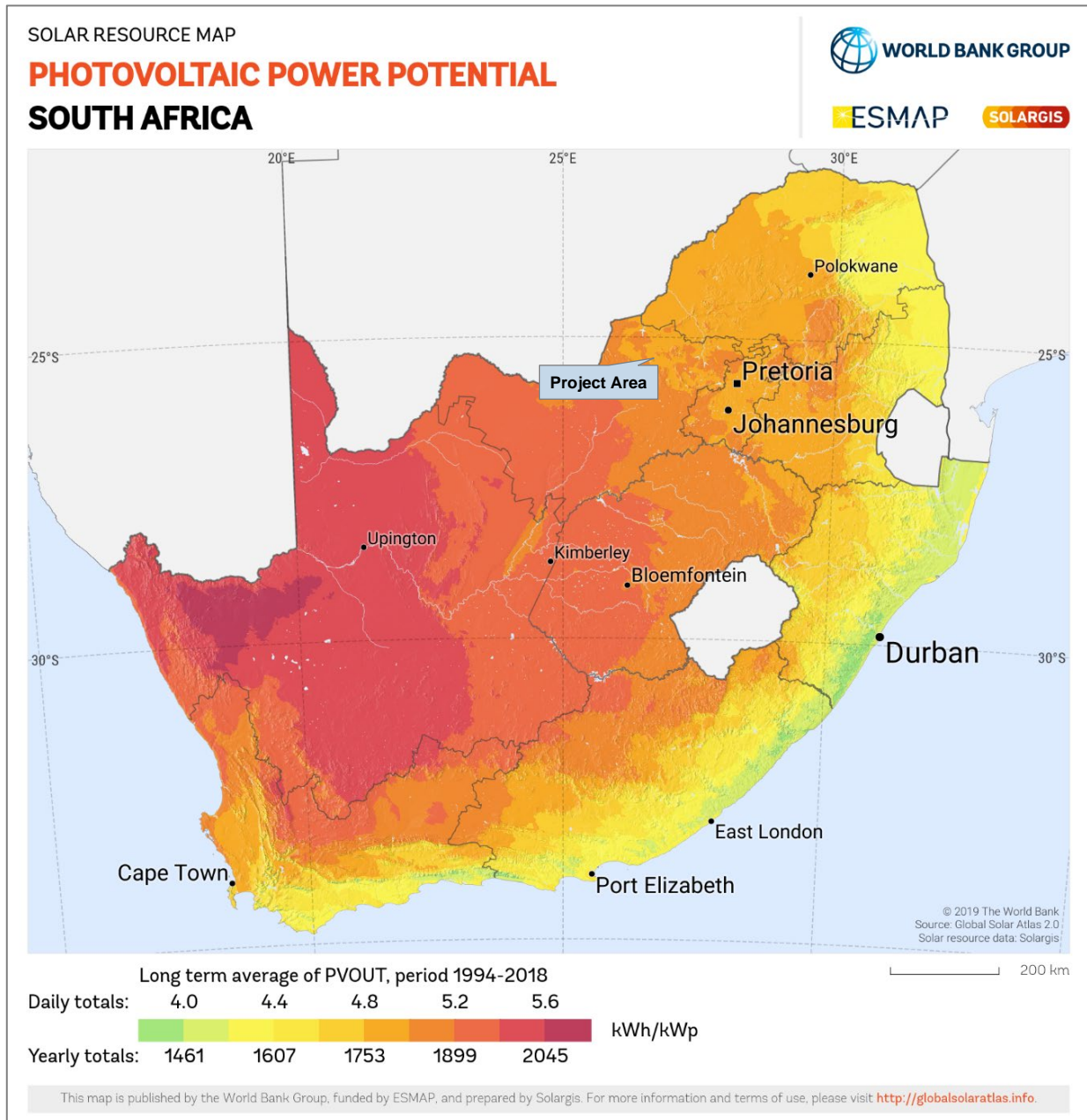


Figure 1: Location of the Project relative to PV Power Potential
 (© 2019 The World Bank, Source: Global Solar Atlas 2.0, Solar resource data: Solargis)

3.2 Geographical Context

The Project is located approximately 35 km to the north west of Rustenburg's central business district (CBD) and falls within Ward 1 of the Rustenburg Local Municipality (RLM), in the North West Province. The site can be accessed via Lindleyspoort Road (off the R565) which runs along the southern boundary of the site. The locality maps are provided in **Figure 2** and **Figure 3** below, and are also contained in **Appendix A**.

The project footprint covers a combined area of up to approximately 400 hectare (ha). The details of the affected properties are provided in **Table 2** below.

Table 2: Details of the affected properties

Farm Details	21-digit Surveyor General No.
PV Site and 132kV Power Line Route	
Farm Onderstepoort 98 RE of Portion 2	T0JQ0000000009800002
Farm Onderstepoort 98 Portion 13 (a portion of Portion 2)	T0JQ0000000009800013
Road Access Properties	
Farm Onderstepoort 98 RE of Portion 2	T0JQ0000000009800002
Farm Paul Bodenstein Landgoed 571	T0JQ00000000057100000
Portion 1 of Farm Elandsfontein No. 102	T0JQ00000000010200001

The Project's coordinates for Alternative 1 and 2 are shown in **Table 3** below. The proposed layout for Alternative 1 is shown in **Figure 4** while Alternative 2 is shown in **Figure 5**.

Table 3: Coordinates for Alternative 1 and Alternative 2

Component	Alternative 1	Alternative 2
PV Site	<ol style="list-style-type: none"> 1. 25°27'02.87"S 27° 01'55.69"E 2. 25°26'32.80"S 27° 01'48.89"E 3. 25°26'22.59"S 27° 01'41.37"E 4. 25°26'07.38"S 27° 01'38.00"E 5. 25°26'02.97"S 27° 01'41.39"E 6. 25°25'56.60"S 27° 01'39.83"E 7. 25°25'38.60"S 27° 02'44.41"E 8. 25°25'30.78"S 27° 02'43.15"E 9. 25°25'26.74"S 27° 01'16.96"E 10. 25°25'30.21"S 27° 01'17.19"E 11. 25°25'36.11"S 27° 01'09.04"E 12. 25°25'36.60"S 27° 01'01.35"E 13. 25°25'41.75"S 27° 00'59.87"E 14. 25°25'50.80"S 27° 01'01.67"E 15. 25°25'53.46"S 27° 01'03.53"E 16. 25°25'58.04"S 27° 01'03.10"E 17. 25°26'09.18"S 27° 01'06.45"E 18. 25°26'18.67"S 27° 01'06.90"E 19. 25°26'22.69"S 27° 01'08.97"E 20. 25°26'33.16"S 27° 01'09.74"E 21. 25°26'38.12"S 27° 01'12.17"E 22. 25°27'06.14"S 27° 01'13.26"E 23. 25°27'15.72"S 27° 01'15.00"E 24. 25°27'17.12"S 27° 01'15.74"E 25. 25°27'15.44"S 27° 01'18.73"E 26. 25°27'18.25"S 27° 01'20.67"E 27. 25°27'14.78"S 27° 01'26.88"E 	<ol style="list-style-type: none"> 1. 25°27'2.90"S; 27° 1'55.87"E 2. 25°26'32.39"S; 27° 1'48.78"E 3. 25°26'22.38"S; 27° 1'41.33"E 4. 25°26'7.34"S; 27° 1'38.01"E 5. 25°26'2.90"S; 27° 1'41.45"E 6. 25°25'56.56"S; 27° 1'39.86"E 7. 25°25'45.33"S; 27° 2'20.28"E 8. 25°25'29.98"S; 27° 2'19.03"E 9. 25°25'26.59"S; 27° 1'16.95"E 10. 25°25'31.68"S; 27° 1'17.64"E 11. 25°25'35.62"S; 27° 1'12.42"E 12. 25°25'38.64"S; 27° 1'5.81"E 13. 25°25'39.69"S; 27° 1'2.61"E 14. 25°25'50.25"S; 27° 1'3.42"E 15. 25°25'57.29"S; 27° 1'4.55"E 16. 25°26'12.21"S; 27° 1'7.47"E 17. 25°26'17.63"S; 27° 1'8.56"E 18. 25°26'26.56"S; 27° 1'11.63"E 19. 25°26'39.39"S; 27° 1'13.34"E 20. 25°26'42.64"S; 27° 1'13.48"E 21. 25°26'53.01"S; 27° 1'13.40"E 22. 25°27'3.69"S; 27° 1'13.34"E 23. 25°27'13.06"S; 27° 1'15.27"E 24. 25°27'16.77"S; 27° 1'16.48"E 25. 25°27'18.27"S; 27° 1'20.64"E 26. 25°27'16.47"S; 27° 1'23.77"E 27. 25°27'12.78"S; 27° 1'30.08"E

	28. 25°27'17.54"S 27° 01'28.97"E	28. 25°27'14.67"S; 27° 1'34.78"E
Access Road:		29. 25°27'17.86"S; 27° 1'29.11"E 30. 25°27'36.82"S; 27° 1'12.93"E 31. 25°28'0.28"S; 27° 0'55.28"E
Laydown area	A. 25°27'11.80"S 27° 1'27.88"E	A: 25°27'12.00"S; 27° 1'34.19"E
Building Area	B. 25°27'14.08"S 27° 1'24.26"E	B: 25°27'12.99"S; 27° 1'24.68"E
BESS	C. 25°27'11.61"S 27° 1'18.23"E	C: 25°27'10.78"S; 27° 1'15.97"E
Substation	D. 25°27'16.15"S 27° 1'20.98"E	D: 25°27'16.91"S; 27° 1'20.26"E

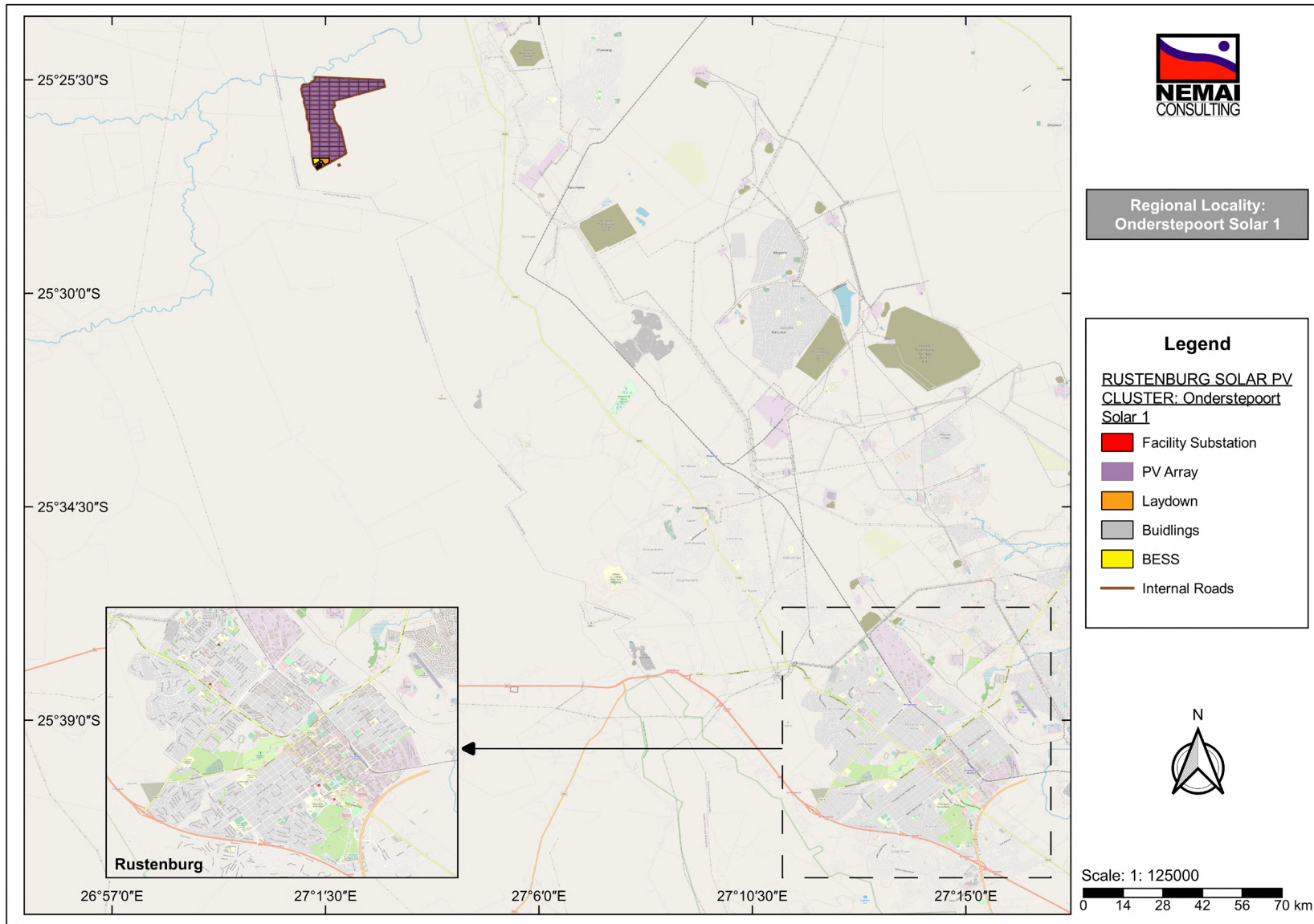


Figure 2: Regional locality map (Not: not all Project components are shown due to scale)



Figure 3: Locality map (Orthophotograph map)

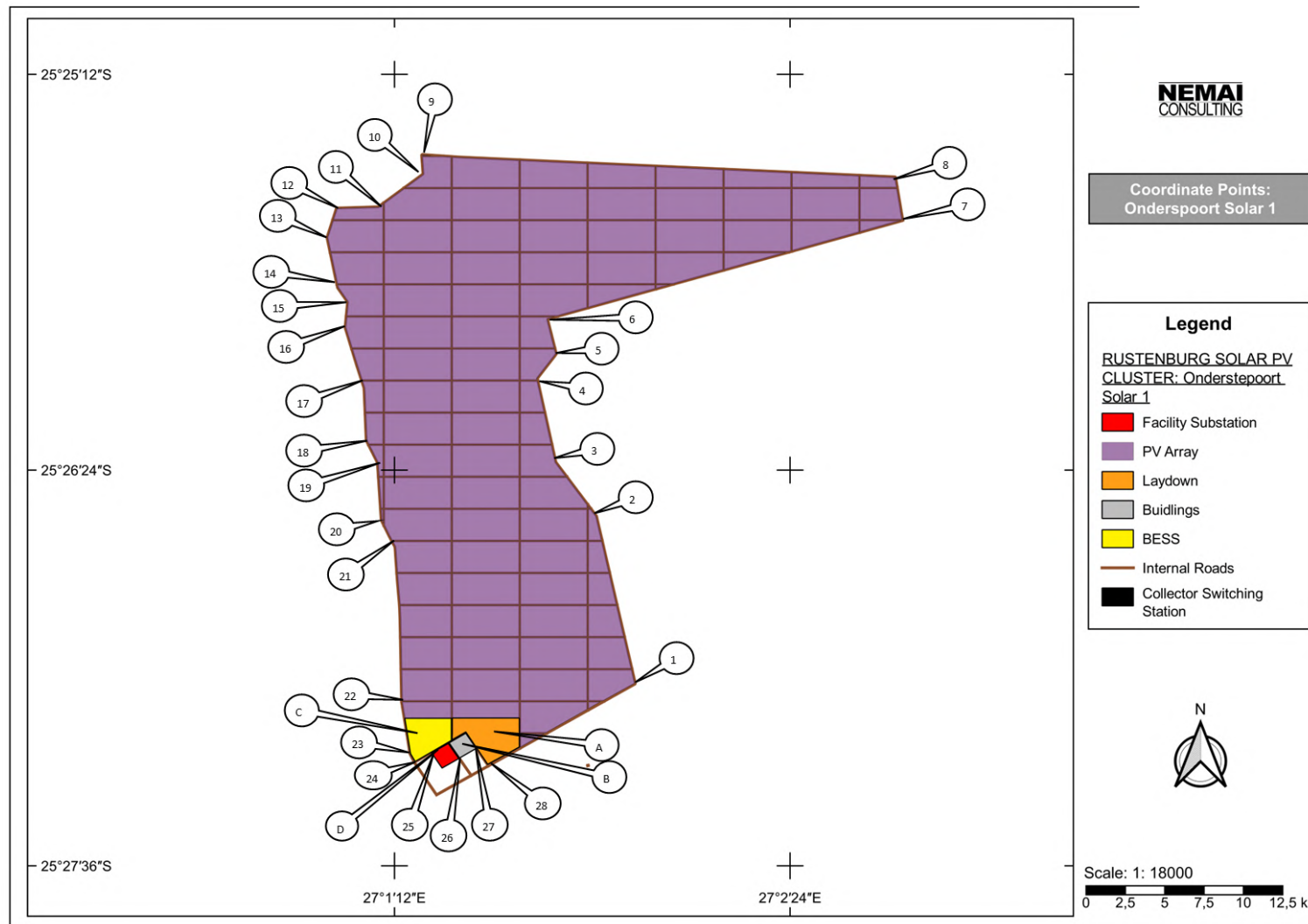


Figure 4: Project's (Alternative 1) coordinate points

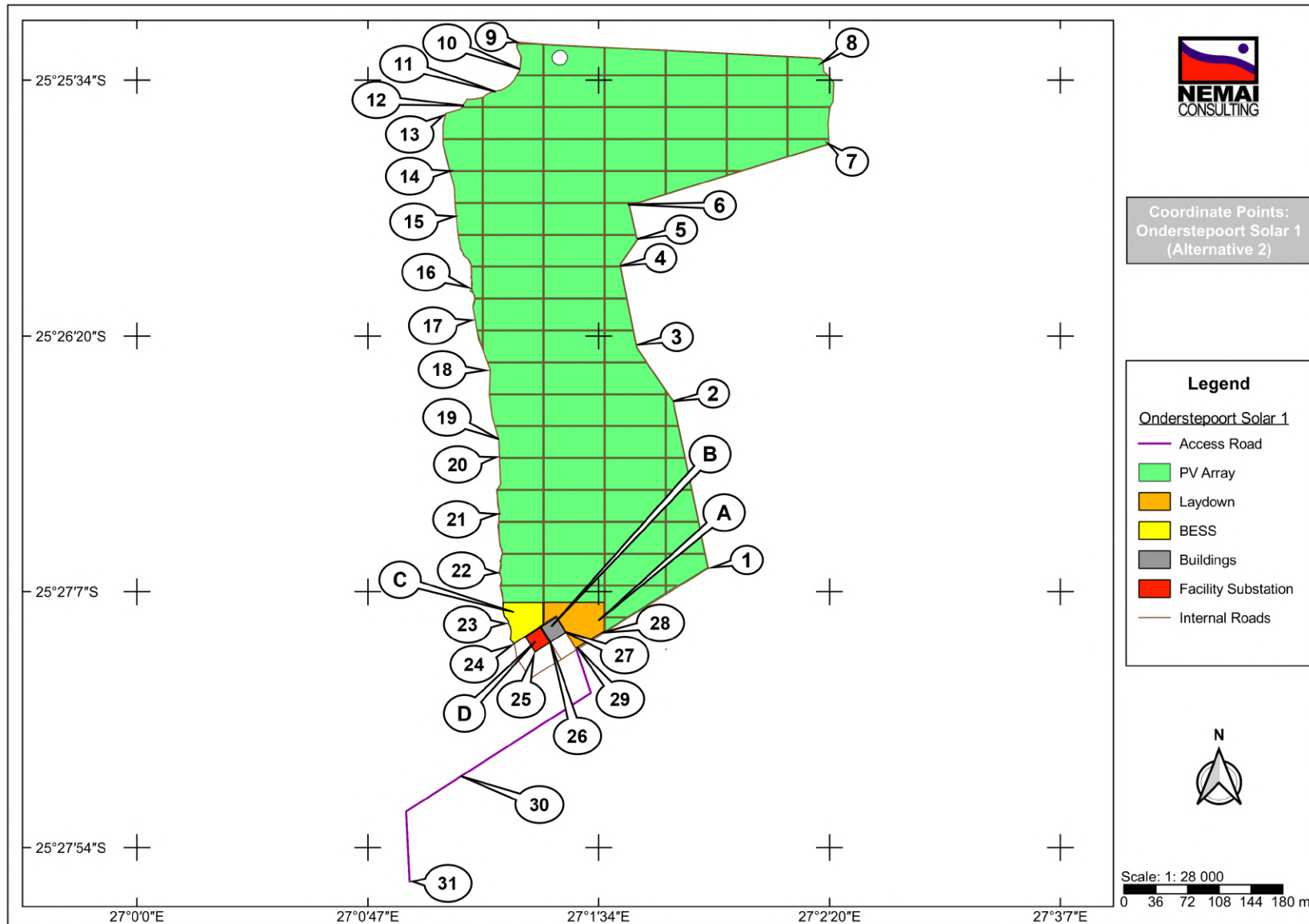


Figure 5: Project's (Alternative 2) coordinate points

4 LEGISLATION AND GUIDELINES CONSIDERED

4.1 International Finance Corporation - Performance Standards & Guidelines

Where relevant, the Project would strive to satisfy and incorporate the International Finance Corporation (IFC) Performance Standards (PS), which serve as an international benchmark for identifying and managing environmental and social risks.

The IFC PS offer a framework for understanding and managing environmental and social risks for high profile, complex, international and potentially high impact projects. The IFC PS encompass the following eight topics:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts;
- Performance Standard 2: Labour and Working Conditions;
- Performance Standard 3: Resource Efficiency and Pollution Prevention;
- Performance Standard 4: Community Health, Safety, and Security;
- Performance Standard 5: Land Acquisition and Involuntary Resettlement;
- Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- Performance Standard 7: Indigenous Peoples; and
- Performance Standard 8: Cultural Heritage.

IFC's Environmental, Health, and Safety (EHS) Guidelines provide technical guidelines with general and industry-specific examples of good international industry practice to meet IFC PS.

4.2 Legislation

4.2.1 *Environmental Statutory Framework*

The legislation that has possible bearing on the proposed Project from an environmental perspective is captured in **Table 4** below. Note this list does not attempt to provide an exhaustive explanation, but rather represents an identification of some of the most appropriate sections from pertinent pieces of legislation.

Table 4: Environmental Statutory Framework

Legislation	Description and Relevance
Constitution of the Republic of South Africa (No. 108 of 1996)	<ul style="list-style-type: none"> ▪ Chapter 2 – Bill of Rights. ▪ Section 24 – Environmental Rights.
National Environmental Management Act (Act No. 107 of 1998)	<ul style="list-style-type: none"> ▪ Key sections (amongst others): <ul style="list-style-type: none"> ○ Section 24 – Environmental Authorisation (control of activities which may have a detrimental effect on the environment). ○ Section 28 – Duty of care and remediation of environmental damage. ▪ Environmental management principles. ▪ Authorisation type – Environmental Authorisation.

Legislation	Description and Relevance
	<ul style="list-style-type: none"> ▪ Authorities – DFFE (national) (competent authority for this application) and the North West Department of Economic Development, Environment, Conservation and Tourism (DEDECT) (provincial).
EIA Regulations	<ul style="list-style-type: none"> ▪ Purpose - regulate the procedure and criteria as contemplated in Chapter 5 of NEMA relating to the preparation, evaluation, submission, processing and consideration of, and decision on, applications for environmental authorisations for the commencement of activities, subjected to EIA, in order to avoid or mitigate detrimental impacts on the environment, and to optimise positive environmental impacts, and for matters pertaining thereto.
GN No. R. 983 of 4 December 2014 (as amended) (Listing Notice 1)	<ul style="list-style-type: none"> ▪ Purpose - identify activities that would require environmental authorisations prior to commencement of that activity and to identify competent authorities in terms of sections 24(2) and 24D of NEMA. ▪ The investigation, assessment and communication of potential impact of activities must follow a Basic Assessment process, as prescribed in regulations 19 and 20 of the EIA Regulations. However, according to Regulation 15(3) of the EIA Regulations, Scoping and Environmental Impact Reporting (S&EIR) must be applied to an application if the application is for two or more activities as part of the same development for which S&EIR must already be applied in respect of any of the activities. ▪ The following activities under Listing Notice 1 are relevant to this Project:
	<p>GN No. R.983 – Activity 11(i):</p> <p><i>The development of facilities or infrastructure for the transmission and distribution of electricity—</i> <i>(i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts; or</i> <i>(ii) inside urban areas or industrial complexes with a capacity of 275 kilovolts or more; excluding the development of bypass infrastructure for the transmission and distribution of electricity where such bypass infrastructure is —</i> <i>(a) temporarily required to allow for maintenance of existing infrastructure;</i> <i>(b) 2 kilometres or shorter in length;</i> <i>(c) within an existing transmission line servitude; and</i> <i>(d) will be removed within 18 months of the commencement of development.</i></p>
	<p>GN No. R.983 – Activity 12(ii)(a) & (c):</p> <p><i>The development of -</i> <i>(i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or</i> <i>(ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs -</i> <i>(a) within a watercourse;</i> <i>(b) in front of a development setback; or</i> <i>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; -</i></p> <p><i>excluding -</i> <i>(aa) the development of infrastructure or structures within existing ports or harbours that</i></p>
	<p><i>The Project will require 132 kV electrical infrastructure. This includes an on-site substation with a capacity of up to 132kV, as well as 132kV powerline infrastructure.</i></p> <p><i>Crossing of watercourses by infrastructure (such as the access road) associated with the Project, as well as Solar PV infrastructure within 32m of a watercourse and drainage lines.</i></p>

Legislation	Description and Relevance	
	<p><i>will not increase the development footprint of the port or harbour;</i> <i>(bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;</i> <i>(cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies;</i> <i>(dd) where such development occurs within an urban area;</i> <i>(ee) where such development occurs within existing roads, road reserves or railway line reserves; or</i> <i>(ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.</i></p>	
	<p>GN No. R.983 – Activity 19:</p> <p><i>The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse; but excluding where such infilling, depositing, dredging, excavation, removal or moving -</i> <i>(a) will occur behind a development setback;</i> <i>(b) is for maintenance purposes undertaken in accordance with a maintenance management plan;</i> <i>(c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;</i> <i>(d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or</i> <i>(e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.</i></p>	<p><i>Crossing of watercourses by infrastructure (such as access road) associated with the Project, as well as Solar PV infrastructure within 32m of a watercourse and drainage lines.</i></p>
	<p>GN No. R.983 – Activity 24(ii):</p> <p><i>The development of a road -</i> <i>(i) for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010; or</i> <i>(ii) <u>with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres;</u></i> <i>but excluding a road -</i> <i>(a) which is identified and included in activity 27 in Listing Notice 2 of 2014;</i> <i>(b) where the entire road falls within an urban area; or</i> <i>(c) which is 1 kilometre or shorter.</i></p>	<p><i>New roads will be required for the projects (construction and operational phases).</i></p> <p><i>The internal roads will be up to 6 m wide and main access roads will be up to 8 m wide. With the inclusion of side drains and gavel embankments, the width of the road may exceed the threshold of this activity.</i></p> <p><i>The bell mouths/turning radii at the road intersections</i></p>

Legislation	Description and Relevance	
		<p><i>might need to be wider than 8m.</i></p>
	<p>GN No. R.983 – Activity 28(ii):</p> <p><i>Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development:</i></p> <p><i>(i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or</i></p> <p><i>(ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare;</i></p> <p><i>excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.</i></p>	<p><i>Footprint of Project on land that was previously used for agricultural purposes, outside of an urban area.</i></p>
	<p>GN No. R.983 – Activity 48(i)(c):</p> <p><i>The expansion of—</i></p> <p><i>(i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or</i></p> <p><i>(ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more; where such expansion occurs—</i></p> <p><i>(a) within a watercourse;</i></p> <p><i>(b) in front of a development setback; or</i></p> <p><i>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;</i></p> <p><i>excluding—</i></p> <p><i>(aa) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;</i></p> <p><i>(bb) where such expansion activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;</i></p>	<p><i>Expansion of the access road within 32m of a dam/watercourse.</i></p>

Legislation	Description and Relevance	
	<p>(cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 23 in Listing Notice 3 of 2014, in which case that activity applies;</p> <p>(dd) where such expansion occurs within an urban area; or</p> <p>(ee) where such expansion occurs within existing roads, road reserves or railway line reserves.</p>	
	<p>GN No. R.983 – Activity 56</p> <p>The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre—</p> <p>(i) where the existing reserve is wider than 13,5 meters; or</p> <p>(ii) where no reserve exists, where the existing road is wider than 8 metres;</p> <p>excluding where widening or lengthening occur inside urban areas</p>	<p>The existing access road/access point for would need to be widened by more than 6m to accommodate heavy vehicle turning.</p>
<p>GN No. R. 984 of 4 December 2014 (as amended) (Listing Notice 2)</p>	<ul style="list-style-type: none"> ▪ Purpose - identify activities that would require environmental authorisations prior to commencement of that activity and to identify competent authorities in terms of sections 24(2) and 24D of NEMA. ▪ The investigation, assessment and communication of potential impact of activities must follow a S&EIR process, as prescribed in regulations 21 to 24 of the EIA Regulations. ▪ The following activities under Listing Notice 2 are relevant to this Project: 	
	<p>GN No. R.984 – Activity 1:</p> <p>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, excluding where such development of facilities or infrastructure is for photovoltaic installations and occurs -</p> <p>(a) within an urban area; or</p> <p>(b) on existing infrastructure.</p>	<p>The proposed Project involves the development of a PV facility with a total generation capacity of 240 MW renewable solar energy.</p>
	<p>GN No. R.984 – Activity 15:</p> <p>The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for-</p> <p>(i) the undertaking of a linear activity; or</p> <p>(ii) maintenance purposes undertaken in accordance with a maintenance management plan.</p>	<p>Cumulative area of indigenous vegetation to be cleared for entire Project (except linear components) will exceed 20 hectares.</p>
<p>GN No. R. 985 of 4 December 2014 (as amended) (Listing Notice 3)</p>	<ul style="list-style-type: none"> ▪ Purpose - list activities and identify competent authorities under sections 24(2), 24(5) and 24D of NEMA, where environmental authorisation is required prior to commencement of that activity in specific identified geographical areas only. ▪ The investigation, assessment and communication of potential impact of activities must follow a Basic Assessment process, as prescribed in regulations 19 and 20 of the EIA Regulations. However, according to Regulation 15(3) of the EIA Regulations, S&EIR must be applied to an application if the application is for two or more activities as part of the same development for which S&EIR must already be applied in respect of any of the activities. ▪ The following activities under Listing Notice 3 are relevant to this Project: 	
	<p>GN No. R.985 – Activity 4 - (h)(i)(ii)(iv)</p>	<p>New internal roads will be wider than 4m and are located within Ecological Support</p>

Legislation	Description and Relevance	
	<p><i>The development of a road wider than 4 metres with a reserve less than 13,5 metres.</i></p> <p><i>h. North West</i></p> <p><i>(i) A protected area including municipal or provincial nature reserves as contemplated by NEMPAA or other legislation;</i></p> <p><i>(ii) Sensitive areas as identified in an environmental management framework as contemplated in Chapter 5 of the Act and as adopted by the competent authority;</i></p> <p><i>Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority;</i></p> <p><i>Core areas in biosphere reserves;</i></p> <p><i>(vi) Areas within 5 kilometres from protected areas identified in terms of NEMPAA or from a biosphere reserve;</i></p>	<p><i>areas in terms of the North West Biodiversity Plan.</i></p> <p><i>The project area lies 5 km South from Pilanesberg National Park and is thus on the edge of the 5 km Protected Area Buffer Zone of this Nature reserve.</i></p>
	<p>GN No. R.985 – Activity 12 - (h) (ii)(iv):</p> <p><i>The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.</i></p> <p><i>h. North West</i></p> <p><i>(ii) A Protected area including municipal or provincial nature reserves as contemplated by NEMPAA or other legislation.</i></p> <p><i>(iv)Critical Biodiversity Areas as identified in systematic biodiversity plans adopted by the competent authority or bioregional plans.</i></p> <p><i>(v)Sensitive areas as identified in an environmental management framework as contemplated in Chapter 5 of the Act and as adopted by the competent authority;</i></p> <p><i>(vi) Areas within a watercourse or wetland, or within 100 metres from the edge of a watercourse or wetland.</i></p> <p><i>Specific</i></p>	<p><i>Clearance of areas of indigenous vegetation as part of the development footprint within the following sensitive areas:</i></p> <ul style="list-style-type: none"> <i>• ESA1 and ESA 2 areas</i> <i>• The project area lies 5 km South from Pilanesberg National Park and is thus on the edge of the 5 km Protected Area Buffer Zone of this Nature reserve.</i>

Legislation	Description and Relevance	
	<p>GN No. R.985 – Activity 14(ii)(a) - (c) - (h)(ii)(iv)</p> <p>The development of—</p> <p>(i) dams or weirs, where the dam or weir, including infrastructure and water surface area exceeds 10 square metres; or</p> <p>(ii) <u>infrastructure or structures with a physical footprint of 10 square metres or more;</u> where such development occurs—</p> <p>(a) within a watercourse;</p> <p>(b) in front of a development setback; or</p> <p>(c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour.</p> <p>h. North West</p> <p>(ii) A Protected area including municipal or provincial nature reserves as contemplated by NEMPAA or other legislation.</p> <p>(iv) Critical Biodiversity Areas as identified in systematic biodiversity plans adopted by the competent authority or bioregional plans.</p> <p>(v) Sensitive areas as identified in an environmental management framework as contemplated in Chapter 5 of the Act and as adopted by the competent authority;</p> <p>(vi) Areas within 5 kilometres from protected areas identified in terms of NEMPAA or from the core areas of a Biosphere reserve.</p>	<p>The project area overlaps with an ESA1 and ESA 2 areas.</p> <p>The project area lies 5 km South from Pilanesberg National Park and is thus on the edge of the 5 km Protected Area Buffer Zone of this Nature reserve.</p>
	<p>GN No. R.985 – Activity 18(h)(i)(ii) (v)</p> <p>The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre.</p> <p>b. North West</p> <p>(i) A Protected area including municipal or provincial nature reserves as contemplated by NEMPAA or other legislation.</p> <p>(ii) Areas within 5 kilometres from protected area as identified in terms of NEMPAA or from a biosphere nature reserve.</p> <p>(v) Critical Biodiversity Areas as identified in systematic biodiversity plans adopted by the competent authority or bioregional plans.</p>	<p>The project area overlaps with an ESA1 and ESA 2 areas.</p> <p>The project area lies 5 km South from Pilanesberg National Park and is thus on the edge of the 5 km Protected Area Buffer Zone of this Nature reserve.</p>
	<p>GN No. R.985 – Activity 23(ii)(c) – (h)(iv)</p> <p>The expansion of-</p> <p>(ii) infrastructure or structures where the physical footprint is expanded by 10 square metres or more; where such expansion occurs-</p> <p>(a) within a watercourse;</p> <p>(b) in front of a development setback adopted in the prescribed manner; or</p>	<p>Expansion of the roads within ESA 1 and ESA 2.</p>

Legislation	Description and Relevance
	<p><i>(c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse, excluding the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour.</i></p> <p><i>(h) North West</i></p> <p><i>(iv) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority;</i></p> <p><i>Sensitive areas as identified in an environmental management framework as contemplated in Chapter 5 of the Act and as adopted by the competent authority;</i></p> <p><i>(vi) Areas within 5 kilometres from protected areas identified in terms of NEMPAA or from the core areas of a Biosphere reserve.</i></p>
National Water Act (Act No. 36 of 1998)	<ul style="list-style-type: none"> ▪ Sustainable and equitable management of water resources. ▪ Key sections (amongst others): <ul style="list-style-type: none"> ○ Chapter 3 – Protection of water resources. ○ Section 19 – Prevention and remedying effects of pollution. ○ Section 20 – Control of emergency incidents. ○ Chapter 4 – Water use. ▪ Authorisation type – General Authorisation / Water Use Licence. ▪ Authority – Department of Water and Sanitation (DWS).
National Environmental Management: Waste Act (Act No. 59 of 2008)	<ul style="list-style-type: none"> ▪ Management of waste. ▪ Key sections (amongst others): <ul style="list-style-type: none"> ○ Section 16 – General duty in respect of waste management. ○ Chapter 5 – licensing of waste management activities listed in GN No. R. 921 of 29 November 2013 (as amended). ▪ Authorisation type – Waste Management Licence (<i>not required for the Project</i>). ▪ Authority – DFFE (national) and DEDECT (provincial).
National Environmental Management Air Quality Act (Act No. 39 of 2004)	<ul style="list-style-type: none"> ▪ Air quality management. ▪ Key sections (amongst others): <ul style="list-style-type: none"> ○ Section 32 – Dust control. ○ Section 34 – Noise control. ▪ Authorisation type – Atmospheric Emission License (<i>not required for the Project</i>). ▪ Authority – DFFE (national), DEDECT (provincial) and municipality.
National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)	<ul style="list-style-type: none"> ▪ Management and conservation of the country's biodiversity. ▪ Protection of species and ecosystems. ▪ Authorisation type – Permit (<i>relevance to the Project to be confirmed</i>). ▪ Authority – DFFE (national) and DEDECT (provincial).
National Forests Act (Act No. 84 of 1998)	<ul style="list-style-type: none"> ▪ Supports sustainable forest management and the restructuring of the forestry sector, as well as protection of indigenous trees in general. ▪ Section 15 – Authorisation required for impacts to protected trees. ▪ Authorisation type – Licence (<i>relevance to the Project to be confirmed</i>). ▪ Authority – DFFE.
National Environmental Management: Protected Areas Act (Act No. 57 of 2003)	<ul style="list-style-type: none"> ▪ Protection and conservation of ecologically viable areas representative of SA's biological diversity and natural landscapes. ▪ No protected areas are directly affected by the Project.
Minerals and Petroleum Resources	<ul style="list-style-type: none"> ▪ Equitable access to and sustainable development of the nation's mineral and petroleum resources and to provide for matters related thereto.

Legislation	Description and Relevance
Development Act (Act No. 28 of 2002)	<ul style="list-style-type: none"> ▪ Key sections (amongst others): <ul style="list-style-type: none"> ○ Section 22 – Application for mining right. ○ Section 27 – Application for, issuing and duration of mining permit. ○ Section 53 – Use of land surface rights contrary to objects of Act. ▪ Authorisation type – Mining Permit / Mining Right (<i>not required for the Project</i>). ▪ Authority – Department of Mineral Resources and Energy (DMRE).
National Heritage Resources Act (Act No. 25 of 1999)	<ul style="list-style-type: none"> ▪ Key sections: <ul style="list-style-type: none"> ○ Section 34 – protection of structure older than 60 years. ○ Section 35 – protection of heritage resources. ○ Section 36 – protection of graves and burial grounds. ○ Section 38 – Heritage Impact Assessment for linear development exceeding 300m in length; development exceeding 5 000m² in extent, etc. ▪ Authorisation type – Permit (<i>relevance to the Project to be confirmed</i>). ▪ Authority – South African Heritage Resources Agency (SAHRA) and North West Heritage Resources Authority (NWHRA).
Conservation of Agricultural Resources Act (Act No. 43 of 1983)	<ul style="list-style-type: none"> ▪ Control measures for erosion. ▪ Control measures for alien and invasive plant species. ▪ Authority – North West Department of Agriculture and Rural Development (DARD).
North West Province Nature Conservation Ordinance 8 of 1969	<ul style="list-style-type: none"> ▪ Provides for the listing of certain protected plant species.
Occupational Health & Safety Act (Act No. 85 of 1993)	<ul style="list-style-type: none"> ▪ Provisions for Occupational Health & Safety. ▪ Authority – Department of Employment and Labour (DEL). ▪ Relevant regulations, such as Electrical Installation Regulations, Construction Regulations, etc.
Hazardous Substance Act (No 15 of 1973) and Regulations	<ul style="list-style-type: none"> ▪ Provides for the control of substances which may cause injury or ill-health to or death of human beings by reason of their toxic, corrosive, irritant, strongly sensitizing or flammable nature or the generation of pressure thereby in certain circumstances, and for the control of certain electronic products ▪ Provides for the division of such substances or products into groups in relation to the degree of danger. ▪ Provides for the prohibition and control of the importation, manufacture, sale, use, operation, application, modification, disposal or dumping of such substances and products.

The relationship between the Project and certain key pieces of environmental legislation is discussed in the subsections to follow.

4.2.2 National Environmental Management Act

NEMA is the framework legislation regulating the environment in SA. According to Section 2(3) of NEMA, “*development must be socially, environmentally and economically sustainable*”, which means the integration of these three factors into planning, implementation and decision-making so as to ensure that development serves present and future generations.

The proposed Project requires authorisation in terms of NEMA and the EIA is being undertaken in accordance the EIA Regulations, which consist of the following:

- EIA procedure - GN No. R 982 (4 December 2014), as amended;
- Listing Notice 1 - GN No. R 983 (4 December 2014), as amended;
- Listing Notice 2 - GN No. R 984 (4 December 2014), as amended; and
- Listing Notice 3 - GN No. R 985 (4 December 2014), as amended.

The Project triggers activities under Listing Notices 1, 2 and 3, and thus needs to be subjected to a Scoping and Environmental Impact Reporting (S&EIR) process. The listed activities are explained within the context of the Project in **Table 4** above and **Table 5** below.

Table 5: Listed Activities Triggered by the Project

Project Components	Relevant Listed Activities	Description of relevance
Solar PV Plant	GN No. R.983 (as amended)	
	Activity no. 12(ii)(a) & (c)	Crossing of watercourses by infrastructure (such as the access road, power line, medium voltage AC cabling, and boundary fence) associated with the Project, as well as Solar PV infrastructure within 32m of a watercourse and drainage lines.
	Activity no. 19	Crossing of watercourses by infrastructure (such as access road, power line, medium voltage AC cabling, and boundary fence) associated with the Project, as well as Solar PV infrastructure within 32m of a watercourse and drainage lines.
	Activity no. 28(ii)	Footprint of proposed Solar PV Plant on land that was previously used for agricultural purposes, outside of an urban area.
	GN No. R.984 (as amended)	
	Activity no. 1	The planned generation capacity of the proposed Solar PV Plant is 240 MW with BESS.
	Activity no. 15	The area of indigenous vegetation in the Project Area is approximately 400 ha, although vegetation will only be cleared for the hardstanding infrastructure, roads, and PV array structure foundations.
	GN No. R.985 (as amended)	
	GN No. R.985 – Activity 12 - (h) (i)(ii)(iv):	New internal roads will be wider than 4m and are located within Ecological Support areas in terms of the North West Biodiversity Plan.
	GN No. R.985 – Activity 14(ii)(a) - (c) - (h)(ii)(iv)	The project area overlaps with an ESA1, and ESA 2 areas.
Power Line & Facility Substation	GN No. R.983 (as amended)	
	GN No. R.983 – Activity 11(i):	The Project will require 132 kV electrical infrastructure.
	GN No. R.985 – Activity 12 - (h) (ii)(iv):	Crossing of watercourses by proposed solar project infrastructure
	Activity no. 19	Construction activities associated with proposed power line
	Activity no. 28(ii)	Footprint of proposed facility substation on land that was previously used for agricultural purposes, outside of an urban area.
	GN No. R.985 (as amended)	
	GN No. R.985 – Activity 12 - (h) (ii)(iv):	Clearance of indigenous vegetation as part of the development footprint within areas falling within 100m from the edge of a watercourse.
	GN No. R.985 – Activity 14(ii)(a) - (c) - (h)(ii)(iv)	The project area overlaps with an ESA1, and ESA2 areas.
Roads	GN No. R.983 (as amended)	

Project Components	Relevant Listed Activities	Description of relevance
	<i>GN No. R.985 – Activity 12 - (h)(ii)(iv):</i>	New internal roads will be wider than 4m and are located within Ecological Support areas in terms of the North West Biodiversity Plan.
	<i>Activity no. 19</i>	Construction activities associated with proposed access roads within a watercourse.
	<i>Activity 24(ii)</i>	The bell mouths/turning radii at the road intersections might need to be wider than 8m.
	<i>Activity 48(i)(c)</i>	Expansion of the access road within 32m of a dam/watercourse.
	<i>Activity 56</i>	The existing access road/access point for would need to be widened by more than 6m to accommodate heavy vehicle turning.
	<i>GN No. R.985 (as amended)</i>	
	<i>Activity 4 - (h)(i)(ii)(iv)</i>	New internal roads will be wider than 4m and are located within Ecological Support areas in terms of the North West Biodiversity Plan.
	<i>Activity 12 - (h)(ii)(iv)(v) vi</i>	Clearance of indigenous vegetation as part of the development footprint within 100m from the edge of a watercourse.
	<i>Activity 14(ii)(a) - (c) - (h)(ii)(iv) (v) (vi)</i>	Development footprint within watercourse(s) / within 32 m from watercourse(s) within an ESA1 and ESA 2 areas.
	<i>Activity 18(h)(i)(ii) (v)</i>	The project area overlaps with ESA1 and ESA 2 areas.
	<i>Activity 23(ii)(c) – (h)(iv)(vi)</i>	Expansion of the roads within sensitive areas.

Note that the dimensions of the Project's proposed infrastructure and components should be regarded as approximates due to the dynamic nature of the planning and design process. As a conservative approach, all activities that could possibly be triggered by the Project were included in the Application Form that was submitted to the DFFE with the draft Scoping Report. Based on the comments received from DFFE on the draft Scoping Report, the proposed BESS does not trigger the storage of dangerous goods in terms of the EIA Listing Notices. Additional triggers under some of the listed activities on Listing Notice 3 applied for were added based on the findings of the Specialist Studies. Hence, and amended Application Form was compiled and submitted to DFFE with the draft EIA Report.

4.2.3 National Environmental Management: Waste Act

Amongst others, the purpose of the National Environmental Management: Waste Act (Act No. 59 of 2008) (NEM:WA) includes the following:

- To reform the law regulating waste management in the country by providing reasonable measures for the prevention of pollution and ecological degradation and for securing ecologically sustainable development;
- To provide for institutional arrangements and planning matters;
- To provide for specific waste management measures;
- To provide for the licensing and control of waste management activities;
- To provide for the remediation of contaminated land; and
- To provide for compliance and enforcement.

“Waste” is defined in NEM:WA as “*any substance, material or object, that is unwanted, rejected, abandoned, discarded or disposed of, or that is intended or required to be discarded or disposed of, by the holder of that*”

substance, material or object, whether or not such substance, material or object can be re-used, recycled or recovered and includes all wastes as defined in Schedule 3 to this Act'.

Schedule 3 of the NEM:WA groups waste into two categories, namely hazardous waste and general waste. The classification of waste determines the associated management and licencing requirements. "Hazardous waste" is defined as *"any waste that contains organic or inorganic elements or compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have a detrimental impact on health and the environment and includes hazardous substances, materials or objects within business waste, residue deposits and residue stockpiles"*.

GN No. R. 921 of 29 November 2013 (as amended) contains a list of waste management activities that have, or are likely to have, a detrimental impact on the environment. If any of the waste management activities are triggered in Category A and Category B, a Waste Management Licence is required. Activities listed in Category C need to comply with the relevant National Norms and Standards.

No authorisation will be required in terms of NEM:WA, as the Project will not include any listed waste management activities. The following is noted with regards to waste management for the Project:

- Construction phase –
 - Temporary waste storage facilities will remain below the thresholds contained in the listed activities under Schedule 1 of NEM:WA; and
 - The Environmental Management Programme (EMPr) (contained in **Appendix H**) makes suitable provisions for waste management, including the storage, handling and disposal of waste.
- Operational phase –
 - Minimum volumes of waste will be generated during the operational phase;
 - Waste from the on-site office and workshop will be sent to licenced municipal waste disposal sites; and
 - Waste generated during maintenance or replacement of panels and inverters will be sent to suitable disposal sites.

4.2.4 National Water Act

The purpose of the National Water Act (Act No. 36 of 1998) (NWA) is to ensure that the nation's water resources are protected, used, developed, conserved, managed and controlled in ways which take into account amongst other factors:

- Meeting the basic human needs of present and future generations;
- Promoting equitable access to water;
- Redressing the results of past racial and gender discrimination;
- Promoting the efficient, sustainable and beneficial use of water in the public interest;
- Facilitating social and economic development;
- Providing for growing demand for water use; protecting aquatic and associated ecosystems and their biological diversity;
- Reducing and preventing pollution and degradation of water resources;
- Meeting international obligations;

- Promoting dam safety; and
- Managing floods and droughts.

The Department of Water and Sanitation (DWS) is the custodian of South Africa's water resources.

Some key definitions from this Act include:

- a) "*Pollution*" – the direct or indirect alteration of the physical, chemical or biological properties of a water resource so as to make it (a) less fit for any beneficial purpose for which it may reasonably be expected to be used; or (b) harmful or potentially harmful;
- b) "*Waste*" – includes any solid material or material that is suspended, dissolved or transported in water (including sediment) and which is spilled or deposited on land or into a water resource in such volume, composition or manner as to cause, or to be reasonably likely to cause, the water resource to be polluted; and
- c) "*Water resource*" – includes a watercourse, surface water, estuary, or aquifer.

The Project layout for Alternative 2 has taken watercourses into consideration by avoiding said watercourses, and therefore, Alternative 2 would not require authorisation in terms of NWA. Alternative 1 of Project falls within non-perennial drainage lines and would entail the following activities that constitute water uses in terms of Section 21 of the NWA:

- Section 21(c) - Impeding or diverting the flow of water in a watercourse; and
- Section 21(i) - Altering the bed, banks, course or characteristics of a watercourse.

The Applicant will seek authorisation from DWS in terms of the NWA for the above water uses associated with the Project since the Project falls within 500m of delineated wetlands.

4.2.5 National Environmental Management: Air Quality Act

The purpose of the National Environmental Management: Air Quality Act (Act No. 39 of 2004) (NEM:AQA) is to reform the law regulating air quality by providing measures for the prevention of pollution and ecological degradation and for securing ecologically sustainable development. This Act aims to promote justifiable economic and social development; to provide for national norms and standards regulating air quality monitoring, management and control by all spheres of government, and for specific air quality measures.

Some key definitions from this Act include:

- "*Air pollution*" – any change in the composition of the air caused by smoke, soot, dust (including fly ash), cinders, solid particles of any kind, gases, fumes, aerosols and odorous substances.
- "*Atmospheric emission*" or "*emission*" – any emission or entrainment process emanating from a point, non-point or mobile source that results in air pollution.
- "*Non-point source*" – a source of atmospheric emissions which cannot be identified as having emanated from a single identifiable source or fixed location, and includes veld, forest and open fires, mining activities, agricultural activities and stockpiles.
- "*Point source*" – single identifiable source and fixed location of atmospheric emission, and includes smoke stacks and residential chimneys.

This Act provides for the listing of activities which result in atmospheric emissions that pose a threat to health or the environment. No person may without an Atmospheric Emission Licence (AEL) conduct any such listed activity. No AEL is required for the Project. Provision is made in the EMPr to manage impacts to air quality as a result of the Project during the construction phase.

4.2.6 National Environmental Management: Biodiversity Act

The purpose of the National Environmental Management: Biodiversity Act (Act No. 10 of 2004) (NEM:BA) is to provide for the management and conservation of SA's biodiversity within the framework of NEMA.

The Act allows for the publication of provincial and national lists of ecosystems that are threatened and in need of protection. The list should include:

- Critically Endangered Ecosystems*, which are ecosystems that have undergone severe ecological degradation as a result of human activity and are at extremely high risk of irreversible transformation.
- Endangered Ecosystems*, which are ecosystems that, although they are not critically endangered, have nevertheless undergone ecological degradation as a result of human activity.
- Vulnerable Ecosystems*, which are ecosystems that have a high risk of undergoing significant ecological degradation.
- Protected Ecosystems*, which are ecosystems that are of a high conservation value or contain indigenous species at high risk of extinction in the wild in the near future.

Similarly, the Act allows for the listing of endangered species, including critically endangered species, endangered species, vulnerable species and protected species. A person may not carry out a restricted activity (including trade) involving listed threatened or protected species without a permit.

The Regulations on the management of Listed Alien and Invasive Species were promulgated on 1 August 2014. The Listed Invasive Species were also published on this date and were subsequently amended in GN 864 of 29 July 2016.

Some key definitions from this Act include:

- "*Alien species*" –
 - A species that is not an indigenous species; or
 - An indigenous species translocated or intended to be translocated to a place outside its natural distribution range in nature, but not an indigenous species that has extended its natural distribution range by natural means of migration or dispersal without human intervention.
- "*Biological diversity*" or "*biodiversity*" – the variability among living organisms from all sources including, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part and also includes diversity within species, between species, and of ecosystems.
- "*Indigenous species*" – a species that occurs, or has historically occurred, naturally in a free state in nature within the borders of the Republic, but excludes a species that has been introduced in the Republic as a result of human activity.
- "*Invasive species*" – any species whose establishment and spread outside of its natural distribution range

- Threaten ecosystems, habitats or other species or have demonstrable potential; and
 - May result in economic or environmental harm or harm to human health.
- “Species” – a kind of animal, plant or other organism that does not normally interbreed with individuals of another kind, and includes any sub-species, cultivar, variety, geographic race, strain, hybrid or geographically separate population.

The Regulations on the management of Listed Alien and Invasive Species were promulgated on 1 August 2014. The Listed Invasive Species were also published on this date and were subsequently amended in GN 864 of 29 July 2016.

The implications of NEM:BA for the Project *inter alia* include the requirements for managing invasive and alien species, protecting threatened ecosystems and species, as well as for rehabilitating the areas affected by the Project (outside of the development footprint).

The findings from the Wetland Delineation and Risk Assessment and Terrestrial Biodiversity Compliance Statement are included in **Section 12.3** and **Section 12.4** below, respectively.

4.2.7 National Heritage Resources Act

The purpose of the National Heritage Resources Act (Act No. 25 of 1999) (NHRA) is to protect and promote good management of SA's heritage resources, and to encourage and enable communities to nurture and conserve their legacy so it is available to future generations.

In terms of Section 38 of the NHRA, certain listed activities require authorisation from provincial agencies, which include the following:

- The construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length;
- The construction of a bridge or similar structure exceeding 50 m in length;
- Any development or other activity which will change the character of a site -
 - Exceeding 5 000 m² in extent; or
 - Involving three or more existing erven or subdivisions thereof; and
- The re-zoning of a site exceeding 10 000 m² in extent.

The findings from the Phase 1 Cultural Heritage Impact Assessment and Palaeontological Impact Assessment that were undertaken for the Project are included in **Section 12.7** and **Section 12.8** below, respectively.

4.3 Governance of Energy in SA

SA has expressed and entrenched its commitment to promoting the use of renewable energy and implementing Energy Efficiency through the following (amongst others):

- SA is a signatory to various international treaties and conventions relating to climate change and greenhouse gas (GHG), such as –

- United Nations Framework Convention on Climate Change;
 - Kyoto Protocol; and
 - Paris Agreement.
- SA has developed the following related policy frameworks –
- White Paper on Energy Policy (1998);
 - White Paper on Renewable Energy (2003);
 - Integrated Energy Plan (2003);
 - IRP 2010;
 - IRP 2019
 - National Climate Change Response White Paper (2011);
 - Post-2015 National Energy Efficiency Strategy;
 - The National Development Plan (2030);
 - Climate Change Bill (2018); and
 - Carbon Tax Bill (2019).
- SA has developed the following related legal frameworks –
- Electricity Regulation Act (Act No. 4 of 2006);
 - National Energy Act (Act No. 34 of 2008); and
 - Income Tax Act (1962) - tax incentive provided for Section 12L.
- The former Department of Environmental Affairs (DEA), which is now known as DFFE, developed EIA Guideline for Renewable Energy Projects (2015).
- SA's related voluntary instruments include –
- South African National Standard (SANS) 941 energy-efficiency of electrical and electronic equipment; and
 - SANS 50001 energy management standard.

4.4 Guidelines

The following guidelines were considered during the preparation of the EIA Report:

- Guideline on Alternatives, EIA Guideline and Information Document Series (DEA&DP, 2010);
- Guideline on Need and Desirability (DEA, 2017);
- Integrated Environmental Management Guideline Series 7: Public Participation in the EIA Process (DEA, 2010);
- EIA Guideline for Renewable Energy Projects (DEA, 2015); and
- Guidelines for Involving Specialists in the EIA Processes Series (Brownlie, 2005).

4.5 National and Regional Plans

The following regional plans were considered during the execution of the Scoping Phase (amongst others):

- RLM's Spatial Development Framework (SDF);

- ❑ RLM's Integrated Development Plan (IDP);
- ❑ North West Biodiversity Plan (2015) (Collins, 2016); and
- ❑ Relevant national, provincial and local policies, strategies, plans and programmes.

4.6 Renewable Energy Development Zones

A Strategic Environmental Assessment (SEA) was undertaken by the former DEA, which is now known as DFFE, in order to identify geographical areas most suitable for the rollout of wind and solar PV energy projects and the supporting electricity grid network. These areas are referred to as Renewable Energy Development Zones (REDZs), in which development will be incentivised and streamlined. The proposed Project footprint in relation to the REDZs are shown in **Figure 5** below.

As shown in **Figure 6** below, the Project is not located within any REDZs or Strategic Transmission Corridors. According to GNR 114 of 16 February 2018, where an Application for Environmental Authorisation for large scale wind or solar PV facilities is being made and these facilities fall outside of the REDZs then these applications will be considered in terms of the requirements of the EIA Regulations.

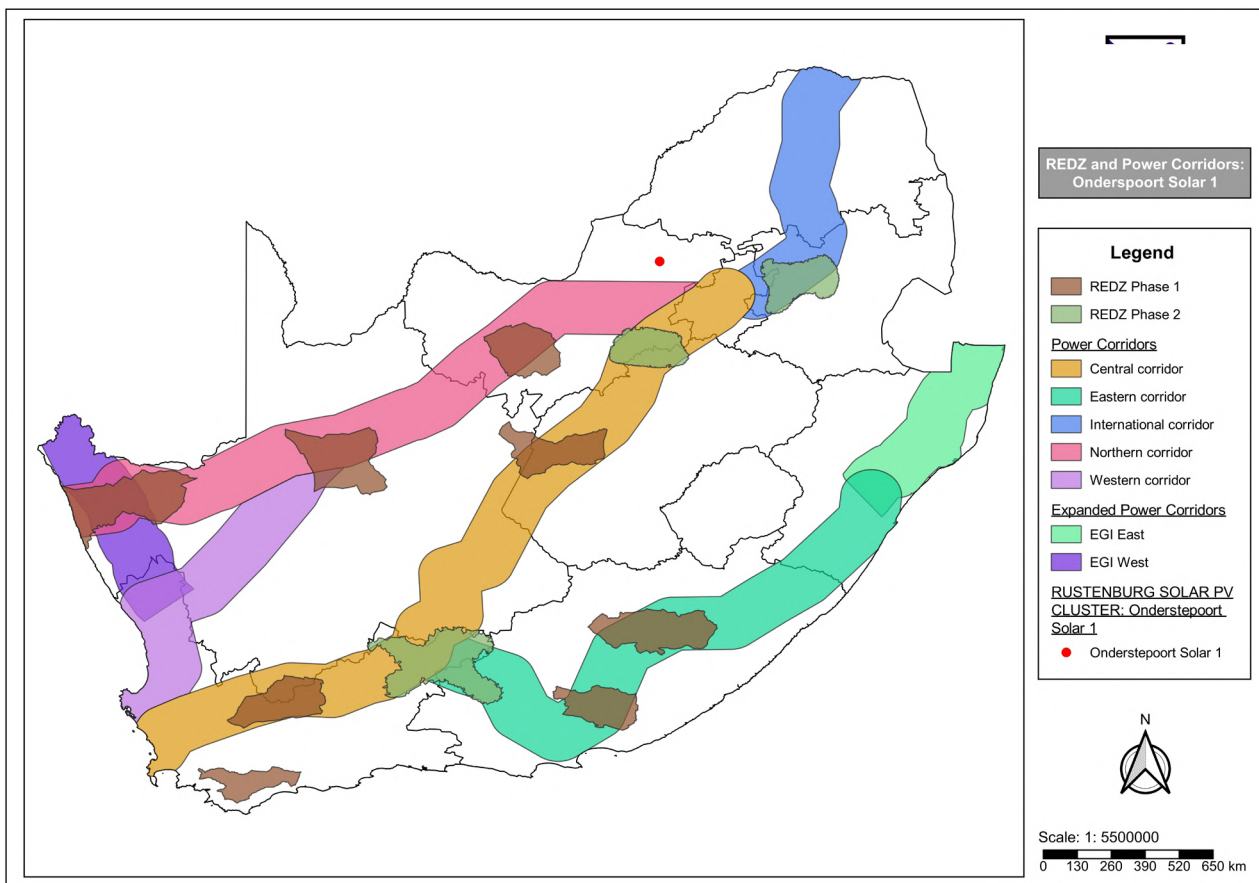


Figure 6: The Project in relation to REDZs

5 SCOPING AND EIA PROCESS

5.1 Environmental Assessment Authorities

In terms of NEMA the lead decision-making authority for the environmental assessment is DFFE, as the competent authority for renewable energy related applications. Due to the geographic location of the Project, DEDECT is regarded as one of the key commenting authorities in terms of NEMA during the execution of the EIA, and all documentation will thus be copied to this Department.

Various other authorities with jurisdiction over elements of the receiving environment or project activities will also be consulted during the course of the EIA. Refer to the database of Interested and Affected Parties (I&APs) contained in **Appendix F** for a list of the government departments.

5.2 Environmental Assessment Practitioner

Nemai Consulting was appointed as the independent Environmental Assessment Practitioner (EAP) to undertake the environmental assessment for the proposed Project. In accordance with Appendix 2, Section 2(1)(a) of the EIA Regulations, this section provides an overview of Nemai Consulting and the company's experience with EIA's, as well as the details and experience of the EAP's that form part of the Scoping and EIA team.

Nemai Consulting is an independent, specialist environmental, social development and Occupational Health and Safety (OHS) consultancy. The company is a 100% black female owned company, with a level 1 BBBEE rating. The company is directed by a team of experienced and capable environmental engineers, scientists, ecologists, sociologists, economists and analysts. The company has offices in Randburg (Gauteng) and Durban (KZN).

The core members of Nemai Consulting that are involved with the S&EIR process for the Project are captured in **Table 6** below, and their respective Curricula Vitae are contained in **Appendix D**. The oath of the EAP is contained in **Appendix K**.

Table 6: Scoping and EIA Core Team Members

Name	Qualifications	Selected Experience - Renewable Energy & Bulk Power Projects
D. Henning (21 years' experience)	MSc (River Ecology)	<ul style="list-style-type: none"> ▪ Matjhabeng 400 MW Solar PV Power Plant with 80 MW (320 MWh) Battery Energy Storage Systems, Free State Province, SA. ▪ Beaufort West 75MW Solar PV Project, Western Cape, SA. ▪ Extraction of Gas and Electric Power Production Plant in the Rubavu District, Rwanda. ▪ Impompomo Hydropower Plant, Mpumalanga, SA. ▪ Hydropower Plant within Hydraulic Network at Rand Water's Zoekfontein Site, Gauteng Province, SA. ▪ uMkhomazi Water Project Phase 1 with hydropower facilities, KwaZulu-Natal, SA. ▪ Neptune-Poseidon Transmission Line, including 200km of 400 kV transmission line, Eastern Cape, SA.

Name	Qualifications	Selected Experience - Renewable Energy & Bulk Power Projects
		<ul style="list-style-type: none"> ▪ Makalu B (Igesi) Substation and Associated Transmission Loop-In Lines, Free State Province, SA. ▪ Anderson Dinaledi Transmission Line, including 80km of 132 kV transmission line with substations, North-West Province, SA.
D. Naidoo (25 years' experience)	BSc Eng (Chem)	<ul style="list-style-type: none"> ▪ Bronkhorstspuit Biogas Plant, Gauteng Province, SA. ▪ Construction of the Xina Solar One Parabolic Trough Technology 100MW Solar Plant, Northern Cape Province, SA. ▪ Construction of the Biotherm Solar Photovoltaic Power Plants, Northern Cape, SA. ▪ Construction of the Roodeplaat Wind Farm, Eastern Cape, SA. ▪ North-South Strengthening Scheme, including 300km of 400 kV transmission line with substations, Mpumalanga, SA. ▪ Mookodi-Mahikeng 400 kV Transmission Line, North-West Province, SA. ▪ Watershed 275/88/132 kV Substation, North-West Province, SA.

5.3 Environmental Screening

According to GN 960 of 5 July 2019, an application for Environmental Authorisation must be accompanied by the report generated by the National Web Based Environmental Screening Tool ("Screening Tool"), as contemplated in Regulation 16(1)(b)(v) of the EIA Regulations.

The aims of the Screening Tool include the following:

- To screen a proposed site for any environmental sensitivity;
- To provide site specific EIA process and review information;
- To identify related exclusions and/or specific requirements including specialist studies applicable to the proposed site and/or development, based on the national sector classification and the environmental sensitivity of the site; and
- To allow for a Screening Report to be generated.

The respective Screening Reports for the proposed PV Site and power line were appended to the Application Form and were also included in the Scoping Report.

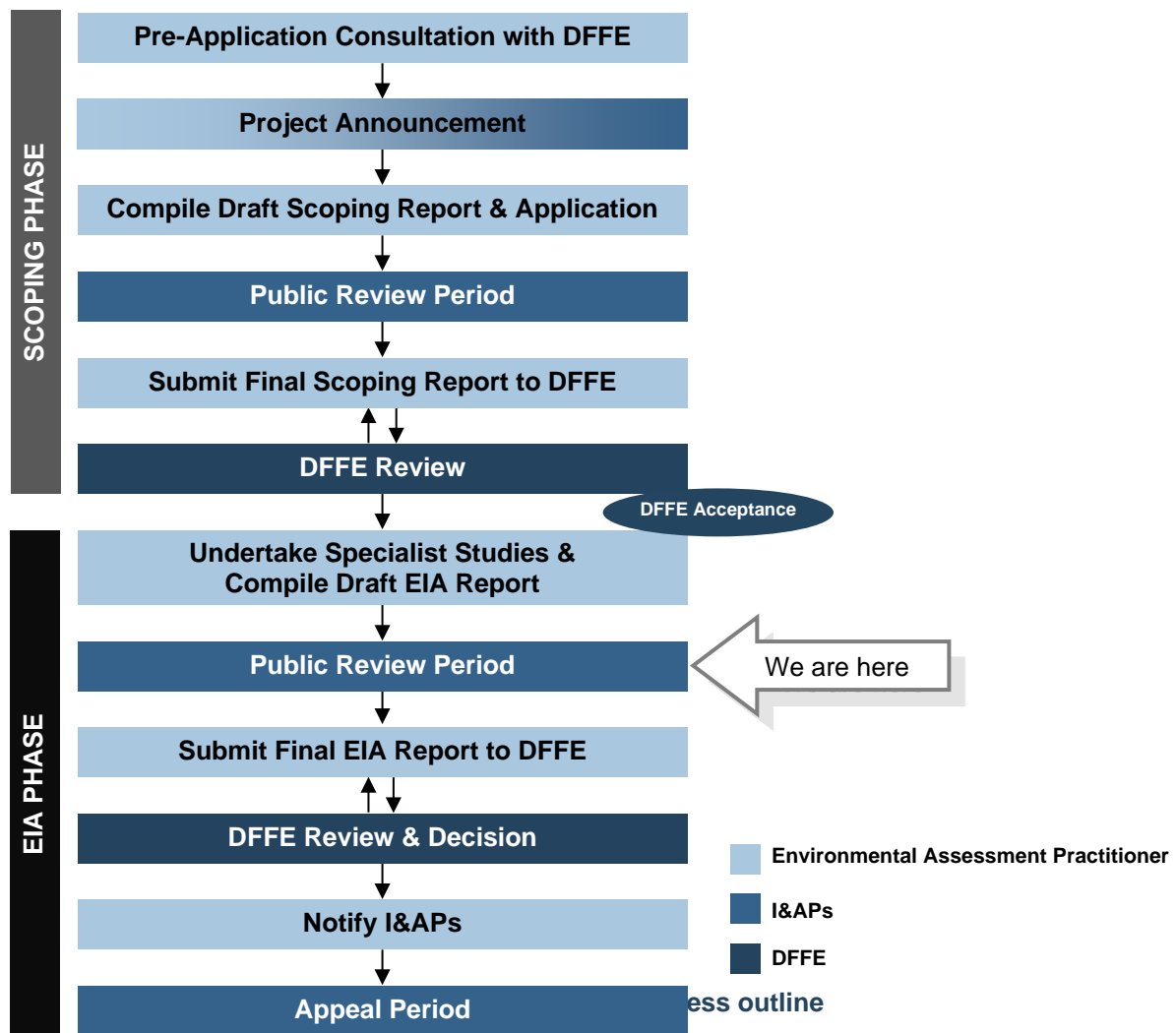
5.4 Environmental Assessment Triggers

The process for seeking authorisation under NEMA is being undertaken in accordance with the EIA Regulations, promulgated in terms of Chapter 5 of NEMA. Based on the types of activities involved the requisite environmental assessment for the project is a S&EIR process. Refer to **Section 5.2.1** and **Section 5.2.2** above for the Project's legal framework and specifically the activities triggered in terms of Listing Notices 1, 2 and 3 of the EIA Regulations.

5.5 S&EIR Process

5.5.1 *Formal Process*

An outline of the S&EIR process for the proposed Project is provided in **Figure 7** below. The objectives of the EIA process, based on the EIA Regulations, are captured in **Section 1** above.



5.5.2 *The EIA Process to Date*

The following key milestones have been reached to date as part of the EIA process:

- (i) A Pre-Application Meeting was held with DFFE on 31 January 2023.
- (ii) A draft Scoping Report, which conformed to Appendix 2 of the EIA Regulations, was compiled. This document included the following salient information (amongst others):
 - a. A Scoping-level impact assessment to identify potentially significant environmental issues for detailed assessment during the EIA phase;
 - b. Screening and investigation of feasible alternatives to the project for further appraisal during the EIA phase; and
 - c. A Plan of Study, which explained the approach to be adopted to conduct the EIA for the proposed project.

- (iii) The Application for Environmental Authorisation and draft Scoping Report were submitted to DFFE on 1 March 2023.
- (iv) The draft Scoping Report was lodged for public review from 1 March 2023 until 4 April 2023.
- (v) The final Scoping Report was submitted to DFFE on 14 April 2023.
- (vi) DFFE accepted the Scoping Report and Plan of Study for the EIA on 23 May 2023 (refer to **Appendix B**), which allowed the commencement of the EIA phase.

5.6 Amended Application Form

An amended Application Form is contained in **Appendix C**, which includes the following changes:

- Refinement of the affected properties list;
- Amendment of the project description of the proposed PV facility; and
- Refinement of listed activities triggered by the Project.

5.7 Alignment with the Plan of Study

The Plan of Study, which was contained in the Scoping Report and was accepted by DFFE, explained the approach to be adopted to conduct the EIA for the proposed Project. The manner in which the EIA Report addresses the requirements of the Plan of Study is shown in **Table 7** below.

Table 7: Alignment of EIA Report with Plan of Study

No.	Plan of Study Requirement	Reference to Section in EIA Report
1.	Assess potentially significant environmental issues identified during Scoping through: <ul style="list-style-type: none"> • Applying an appropriate impact assessment methodology. • Conducting specialist studies. • Identifying suitable mitigation measures. 	1. Section 12 2. Section 13
2.	Assessment of feasible alternatives.	3. Section 14
3.	Specialist studies to be completed in accordance with Terms of Reference.	• Section 12 • Appendix E
4.	Public participation to include the following: <ul style="list-style-type: none"> • Update the database of I&APs. • Allow for the review of the draft EIA Report. • Convene a public meeting. • Compile and maintain a Comments and Responses Report (CRR). • Notification of DFFE's decision. 	Section 15
5.	EIA Report to satisfy the minimum requirements stipulated in Appendix 3 of the EIA Regulations.	Section 2
6.	Authority Consultation.	Section 15

5.8 Addressing DFFE's Requirements

The manner in which DFFE's specific requirements, as listed in the letter received from this Department for the acceptance of the Scoping Report (refer to **Appendix B**), have been attended to are described in **Table 8** below.

Table 8: DFFE's Specific Requirements - Acceptance of the Scoping Report

DFFE's Requirements	Response/Status
(i) Listed Activities	
(a) The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.	Refer to Section 13 below for the assessment of the listed activities and the identified mitigation measures
(b) The listed activities represented in the EIAR and the application form must be the same and correct	<p>The listed activities contained in Table 3 and Table 4 above are the same as those contained in the amended Application Form (Appendix C).</p> <p>The listed activities triggered are explained in the context of the Project in Table 3 and Table 4 above. The findings of the specialist studies were considered in confirming the listed activities triggered.</p>
(c) The EIAR must assess the correct sub-listed activity for each listed activity applied for. The onus is on the EAP and applicant to ensure that no other activities are triggered, and the correct activities are applied for.	Refer to Table 3 and Table 4 above for the sub-listed activity for each listed activity triggered by the Project.
(d) Listed activities triggered by proposed project under Listing Notice 3 are incomplete in the SR. Please ensure that the EIAR include all listed activities triggered and are written in full including the description of sub-listed activities.	Refer to Table 3 and Table 4 above for the sub-listed activity for each listed activity triggered by the Project.
(e) Project description provided in the SR cannot be linked with listed activity as it does not include the threshold of the proposed infrastructure. The Department take note that the thresholds are still to be confirmed during the EIAR phase. Please ensure that this information is provided in the draft EIAR	Refer to Table 3 and Table 4 above for the sub-listed activity for each listed activity triggered by the Project.
(ii) Public Participation	
(a) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR. This includes but is not limited to the Eskom, the Free State Department of Environment, Local and District Municipality, Department of Agriculture, the South African Heritage Resources Agency (SAHRA), The South African Civil Aviation Authority (SACAA), The Department of Transport, The Department of Water and Sanitation (DWS), The South African National Roads Agency Limited (SANRAL), The Endangered Wildlife Trust (EWT), The Endangered Wildlife Trust (EWT), Square Kilometre Array (SKA), The South African Astronomy Observation (SAAO) and the Department of Environment, Forestry and Fisheries: Directorate Biodiversity and Conservation.	Copies of the draft EIA Report were provided to the key regulatory and commentary authorities listed in Section 15 below. Comments received on the draft EIA Report will be appended to the final EIA Report, which will be submitted to DFFE. These comments will also be incorporated into the CRR.
(b) Please ensure that all issues raised, and comments received during the circulation of the draft SR and draft EIAR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAR. Proof of correspondence with the various stakeholders must be	The CRR contained in Appendix G includes comments received during the Scoping phase. The CRR will be updated with comments received during the review of the final EIA Report.

DFFE's Requirements	Response/Status
included in the final EIAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.	
(c) A Comments and Response trail report (C&R) must be submitted with the final EIAR. The C&R report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Appendix 1 of this comments letter in chronological order. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to I&AP's comments	The CRR is contained in Appendix G .
(d) Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.	The CRR, which is contained in Appendix G , does not categorise the comments received.
(e) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations, 2014, as amended	The approach to Public Participation during the EIA phase is explained in Section 15 below.
(f) The EAP is requested to contact the Department to make the necessary arrangements to conduct a site inspection prior to the submission of the final EIAR.	The EAP will liaise with the DFFE Case Officer once the draft EIAR is submitted to the Department.
(iii) Cumulative Assessment	
(a) Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following: <ol style="list-style-type: none"> 1. Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land. 2. Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. 3. The cumulative impacts significance rating must also inform the need and desirability of the proposed development. 4. A cumulative impact environmental statement on whether the proposed development must proceed. 	Potential cumulative impacts associated with the Project and these other renewable energy applications are discussed in Section 13.28 .
(iv) Specialist assessments	
(a) The EAP must ensure that the terms of reference for all the identified specialist studies must include the following: <ul style="list-style-type: none"> ▪ A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisations. ▪ Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in 	Provision was made in the terms of reference for the specialist studies to cater for these requirements. Potential cumulative impacts associated with the Project are discussed in Section 13.28 below.

DFFE's Requirements	Response/Status
<p>the right season and providing that as a limitation will not be allowed.</p> <ul style="list-style-type: none"> ▪ Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas. ▪ Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable. ▪ All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA. ▪ Should a specialist recommend specific mitigation measures, these must be clearly indicated. ▪ Regarding cumulative impacts: <ul style="list-style-type: none"> a. Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land. b. A detailed process flow to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. c. Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process. d. The significance rating must also inform the need and desirability of the proposed development. e. A cumulative impact environmental statement on whether the proposed development must proceed. 	
<p>(b) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.</p>	<p>The specialists did not provide contradicting recommendations.</p>
<p>(c) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Should this study be required, the</p>	<p>The relevant specialist studies complied with the requirements of these Protocols. Site sensitivity verifications were undertaken by the Specialists and are included in their respective reports as a separate chapter, as has been accepted by DFFE in other applications. Section 12.2 below provide the reasons for excluding certain specialist studies that were identified during Environmental Screening.</p>

DFFE's Requirements	Response/Status
<p>specialist assessments must be conducted in accordance with these protocols.</p> <p>(d) The screening tool output:</p> <ul style="list-style-type: none"> ▪ The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool. ▪ It is the responsibility of the EAP to confirm the list of specialist assessments and to motivate in the assessment report, the reason for not including any of the identified specialist studies including the provision of photographic evidence of the site situation. The site sensitivity verification for each of the recommended studies, as per the protocols, must be compiled and attached. 	<p>The site sensitivity verification for the studies not undertaken are included as a separate report under Appendix E.</p>
<p>(e) Additionally, the protocols specify that an assessment must be prepared by a specialist who is an expert in the field and is SACNASP registered for e.g.an aquatic assessment must be prepared by a specialist registered with SACNASP, with expertise in the field of aquatics sciences.</p>	<p>Section 12 below provides the SACNASP registration details of the relevant specialists.</p>
<p>(f) Please be reminded that section 2(3) of NEMA requires developments to be socially, environmentally and economically sustainable, while section 2(4)(i) of NEMA requires the social, economic and environmental impacts of activities, including disadvantages and benefits, to be considered, assessed and evaluated.</p>	<p>Refer to the specialist summary under Section 12 and the impact assessments under Section 13.</p>
<p>(g) Specialist findings and recommendations must be separated per project.</p>	<p>Refer to the specialist summary under Section 12.</p>
<p>(h) The following Specialist Assessments will form part of the EIAr:</p> <ul style="list-style-type: none"> ▪ Terrestrial Ecological Impact Assessment; ▪ Aquatic Impact Assessment & Delineation ▪ Avifaunal Impact Assessment; ▪ Heritage Impact Assessment; ▪ Agricultural Impact Assessment; ▪ Social Impact Assessment; ▪ Visual Impact Assessment; and ▪ Desktop Palaeontological Impact Assessment. 	<p>The Desktop Palaeontological Impact Assessment was conducted due to the High to Medium rating of the Palaeontological Sensitivity (underlain by Alluvium, Elluvium, Colluvium and Gravel, as well as the Silverton and Magaliesberg Formation (Pretoria Group, Transvaal Supergroup) and the Rustenburg Layered Suit) according to the PalaeoMap of the South African Heritage Resources Information System (SAHRIS).</p> <p>Furthermore, a Traffic Impact Assessment was undertaken.</p> <p>Specialist studies are summarized under Section 12 and the reports can be found under Appendix E.</p>
(v) General	
<p>(a) Recommendations of conditions to be included in the EA, must be done per project.</p>	<p>Refer to Section 16.3 below.</p>
<p>(b) Details of the future plans for the site and infrastructure after decommissioning in 20-30 years and the possibility of upgrading the proposed infrastructure to more advanced technologies must be indicated.</p>	<p>The Applicant provided the following response: Ideally, the power purchase agreement (PPA) with Eskom and Implementation and Direct Agreement with the Department of Energy will be renegotiated at the end of the project lifespan (20 – 25years) in which case the facility won't be decommissioned. In the</p>

DFFE's Requirements	Response/Status
	unlikely event that this isn't possible, various components of the proposed SEF which are decommissioned will be reused, recycled or disposed of in accordance with the relevant regulatory requirements. Some components may also be traded or sold as there is an active second-hand market for scrap metal. The decommissioning phase of the project is also expected to create skilled and unskilled employment opportunities.
(c) The EAP must provide landowner consent for all farm portions affected by the proposed project, whether the project component is linear or not, i.e. all farm portions where the access road, solar panels and associated infrastructure is to be located.	Regulation 39(1) of the EIA Regulations requires the proponent, if not the owner or person in control of the land on which the activity is to be undertaken, to obtain written consent of the landowner or person in control of the land in order to undertake such activity on that land. In line with Regulation 39(2)(a), the need to obtain landowner consent does not apply to linear activities. Therefore, the Project proponent has obtained written consent from the landowner for the activities related to the Solar PV facility. Landowner consent for the access road and powerline route are not included with this application, as per the EIA Regulations. In addition, the proposed 132kV powerline associated with this Project falls on the same property as the PV facility.
(d) Please also ensure that the EIAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended	Refer to Section 16.3 below.

5.9 Other Applications in Project Area

DFFE has created the SA Renewable Energy EIA Application (REEA) Database, which contains spatial data for renewable energy applications for Environmental Authorisation. It includes spatial and attribute information for both active (in process and with valid authorisations) and non-active (lapsed or replaced by amendments) applications.

A map is contained in **Figure 8** below, which shows other renewable energy applications within a 30 km radius of the PV Site. There are two other renewable energy applications in close proximity to the Project i.e. Onderstepoort Solar 2 and Rhino Solar. These two application will be submitted concurrently with the Onderstepoort Solar 1 application.

Potential cumulative impacts associated with the Project and these other renewable energy applications are discussed in **Section 13.28** below.

6 ASSUMPTIONS AND LIMITATIONS

The following assumptions and limitations accompany the EIA process:

- ❑ As the design of the project components is still in feasibility stage, and due to the dynamic nature of the planning environment, the dimensions and layout of the infrastructure may change during the detailed design phase.
- ❑ Regardless of the analytical and predictive method employed to determine the potential impacts associated with the Project, the impacts are only predicted on a probability basis. The accuracy of the predictions is largely dependent on the availability of environmental data and the degree of understanding of the environmental features and their related attributes.
- ❑ The following assumptions, gaps and limitation were noted as part of the Specialist Studies:
 - Wetland Delineation and Risk Assessment (van Rooyen, 2023) –
 - This report is based on the information and layout received from the proponent;
 - The findings, observations, conclusions and recommendations are based on the author's best professional and scientific knowledge; and
 - The assessment of wetlands presented in this report is limited to the proposed project footprint and does not include the extended 500 m radius regulated area of the Onderstepoort Solar 1 Facility. Therefore, this report cannot be used for WUL application.
 - Terrestrial Biodiversity Compliance Statement (Human, 2023) –
 - It is assumed that all information received from the client is accurate;
 - The assessment area was based on the area provided by the client and any alterations to the route and/or missing GIS information pertaining to the assessment area would have affected the area surveyed; · The area was only surveyed during a single site visit and therefore, this assessment does not consider temporal trends; · Only a single season survey has been conducted for the respective studies, this would constitute a wet season survey with its limitations;
 - Some winter flowering plants could have been missed due to the wet season survey timing;
 - It must be noted that during the survey, only a fraction of the expected geophytes was visible due to their variable emergence patterns
 - Whilst every effort is made to cover as much of the project area as possible, representative sampling is completed and by its nature, it is possible that some plant and animal species that are present across the project area were not recorded during the field investigations.
 - Avifaunal Baseline and Impact Assessment (Clark, 2023) –
 - The Project Area of Influence (PAOI) was based on the project footprint area as provided by the client, as well as a 500 m corridor around the powerlines. See section 2.1 of this report for additional details. Any alterations to the area and/or missing Geographic Information Systems (GIS) information pertaining to the assessment area would have affected the area surveyed and hence the results of this assessment;
 - Two site visits were conducted for the purpose of this regime 2 assessment. The first was conducted in summer, over 4 days from the 5th to the 8th of January 2023, and the

second, also in summer, over 4 days from the 13th to the 16th of March 2023. These two site visits are considered sufficient from a seasonal perspective and no additional season assessment is required.

- Whilst every effort was made to cover as much of the PAOI as possible it is possible that some species that are present within the PAOI were not recorded during the field investigations due to their secretive behaviour; and
- The GPS used in the assessment has an accuracy of 5 m and consequently any spatial features delineated may be offset by up to 5 m.
- Phase 1 Cultural Heritage Impact Assessment (Kitto, 2023) –
 - This assessment assumes that all the information provided by the Environmental Assessment Practitioner (EAP) regarding the project footprint (Including the powerline) is correct and current.
 - The project area traverses various properties separated by fences, and access was sometimes restricted by locked gates in some areas.
 - The large area of the project footprint meant that it was not feasible to undertake a pedestrian survey of the whole area and the fieldwork therefore, comprised a combination of vehicle and pedestrian investigation. The extremely dense and long vegetation in several areas meant that archaeological and heritage visibility was low in those areas. Therefore, there is a possibility that some heritage resources were not identified, specifically, informal graves or burial sites.

Palaeontological Impact Assessment (Butler, 2023) –

- The focal point of geological maps is the geology of the area and the sheet explanations of the Geological Maps were not meant to focus on palaeontological heritage. Many inaccessible regions of South Africa have never been reviewed by palaeontologists and data is generally based on aerial photographs alone. Locality and geological information of museums and universities databases have not been kept up to date or data collected in the past have not always been accurately documented.
- Comparable Assemblage Zones in other areas is also used to provide information on the existence of fossils in an area which has not documented in the past. When using similar Assemblage Zones and geological formations for Desktop studies it is generally assumed that exposed fossil heritage is present within the footprint. A field-assessment will thus improve the accuracy of the desktop assessment.
- Visual Impact Assessment (Buys, 2023) –
 - Determining the value, quality and significance of a visual resource or the significance of the visual impact that any activity may have on it, in absolute terms, is not achievable. Visual perception is by nature a subjective experience, as it is influenced largely by personal opinions and world views. For instance, what one viewer may experience as an intrusion in the landscape, another may regard as positive. Such differences in perception are greatly influenced by culture, education, and socio-economic background. A degree of subjectivity is therefore bound to influence the rating of visual impacts. It is therefore impossible to conduct a visual assessment without relying to some extent on the opinion of an experienced consultant, which is inherently subjective. The subjective opinion of the visual consultant is however unlikely to materially influence the findings and recommendations of this study, as a wide body of scientific knowledge exists in the industry of VIA, on which findings are based.

- A once-off field survey was sufficient to characterise the baseline visual characteristics of the site.
- The primary objective of this study was to assess the visual environment.
- The fieldwork relevant to this study was a once-off assessment that was conducted.
- A preliminary layout was available. Detailed dimensions, such as the vertical offset of proposed surface infrastructure above ground level, were however not available and were assigned based on experience from similar infrastructure in previous projects.
- All viewsheds were based on terrain level. As such these viewsheds do not incorporate distractive views in the form of vegetation or land use (infrastructure, buildings, etc.).
- This study did not include an illumination or social assessment.
- The assessment of impacts and recommendation of mitigation measures was informed by the site-specific aspects identified and based on the assessor's working knowledge and experience with similar activities.
- Social Impact Assessment (Tanhuke & Chidley, 2023) -
 - The information obtained during the public participation phase provides a comprehensive account for the community structure and community concerns for the project.
 - The study was done with the information and the time frames available to the specialist at the time of executing the study. The specialist took an evidence-based approach in the compilation of this report and did not intentionally exclude information which is relevant to the assessment; and
 - No relocation of families will take place for this project.
- Agricultural Compliance Statement (Gouws, 2023) –
 - The observations are accepted as representative of the soil conditions. The author feels confident that this is the case.
 - There were sufficient observations made that no gaps in knowledge or data is expected.
- Traffic Impact Assessment (Johnson, 2023) -
 - This study is based on the project information provided by the client.
 - According to the Eskom Specifications for Power Transformers (Eskom Power Series, Volume 5: Theory, Design, Maintenance and Life Management of Power Transformers), the following dimensional limitations need to be kept when transporting the transformer – total maximum height 5 000 mm, total maximum width 4 300 mm and total maximum length 10 500 mm. It is envisaged that for this project the inverter, transformer, and switchgear will be transported to site in containers on a low bed truck and trailer. The transport of a mobile crane and the transformer are the only abnormal loads envisaged. The crane will be utilised for offloading equipment, such as the transformer.
 - Maximum vertical height clearances along the haulage route are 5.2 m for abnormal loads.
 - If any elements are manufactured within South Africa, these will be transported from their respective manufacturing centres, which would be either in the greater Cape Town area, Johannesburg, or possibly in Pinetown/Durban.
 - All haulage trips will occur on either surfaced national and provincial roads or existing gravel roads.
 - Material for the construction of internal access roads will be sourced locally as far as possible.
 - The final access points are to be determined during the detailed design stage. Only recommended access points at conceptual level can be given at this stage.

- Planned or approved projects in the vicinity of the site to be considered as part of the cumulative impacts.
- An 18 to 24 months construction period is assumed with some of the construction period dedicated to site prep and civil works.

7 NEED AND DESIRABILITY

This section serves to expand on the motivation for the proposed Project that is provided in **Section 3** above. The format contained in the Guideline on Need and Desirability (DEA, 2017) was used in **Table 9** below.

Table 9: Need for and desirability of the proposed Project

Question No.	Response
<p>1. How will this development (and its separate elements/aspects) impact on the ecological integrity of the area?</p> <p>1.1. How were the following ecological integrity considerations taken into account?:</p> <p>1.1.1. Threatened Ecosystems.</p> <p>1.1.2. Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure.</p> <p>1.1.3. Critical Biodiversity Areas (“CBAs”) and Ecological Support Areas (“ESAs”).</p> <p>1.1.4. Conservation targets.</p> <p>1.1.5. Ecological drivers of the ecosystem.</p> <p>1.1.6. Environmental Management Framework.</p> <p>1.1.7. Spatial Development Framework.</p> <p>1.1.8. Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.).</p>	<p>The following specialist studies were undertaken to assess the impacts of the Project on the ecological integrity of the area:</p> <ul style="list-style-type: none"> ▪ Aquatic Assessment; ▪ Terrestrial Ecological Assessment; and ▪ Avifaunal Assessment. <p>The findings of the above studies are presented this EIA Report. Furthermore, layouts were amended so that all sensitive areas were avoided, and ecological corridors were established. This is to ensure that the ecological integrity and processes would not be compromised.</p> <p>The Project will provide clean energy which is in line with several global and international responsibilities.</p> <p>Management objectives will be included in the EIA Report and EMPr to safeguard the sensitive ecological features.</p> <p>One of the initiatives identified in the Rustenburg Local Municipality’s Integrated Development Plan (2017 to 2022) is to the decarbonization of electricity i.e. transition from coal powered electricity to renewable energy.</p> <p>An Agricultural Impact Assessment has been undertaken and the findings are presented in this EIA Report.</p> <p>The Applicant intends to bid for the current and future REIPPPP bid windows and/or other renewable energy markets within SA. The REIPPPP is a competitive tender process that was designed to facilitate private sector investment into grid-connected renewable energy (RE) generation in SA.</p>
<p>1.2. How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity? What measures were explored to firstly avoid these negative impacts, and where these negative impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</p>	<p>Potential disturbances to ecosystems may include the following:</p> <ul style="list-style-type: none"> ▪ Clearance of large areas of indigenous vegetation associated with the construction footprint of the PV facility and associated infrastructure; ▪ Potential loss of sensitive environmental features; ▪ Pollution of water resources; ▪ Soil destabilisation and subsequent erosion; and ▪ Proliferation of alien and invasive species. <p>The following specialist studies were undertaken to assess the impacts of the Project on the ecological integrity of the area:</p> <ul style="list-style-type: none"> ▪ Aquatic Assessment;

Question No.	Response
	<ul style="list-style-type: none"> ▪ Terrestrial Ecological Assessment; and ▪ Avifaunal Assessment. <p>The findings of the above studies are presented in this EIA Report. Furthermore, layouts were amended so that all sensitive areas were avoided, and ecological corridors were established. This is to ensure that the ecological integrity and processes would not be compromised.</p> <p>Mitigation measures are included in the EIA Report and EMPr to minimise disturbances to ecosystems, according to the mitigation hierarchy.</p>
<p>1.3. How will this development pollute and/or degrade the biophysical environment? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</p>	<p>The Project may cause surface water, groundwater, soil, air, noise and light pollution during the construction and operational phases.</p> <p>Environmental sensitivities were established through ground-truthing by specialists, these were overlaid on the scoping phase layout and the layout was refined so that all sensitive areas were avoided, and ecological corridors were established. This is to ensure that the ecological integrity and processes would not be compromised.</p> <p>The above impacts have been assessed during the EIA Phase and mitigation measures have included in the EIA Report and EMPr to manage these impacts.</p>
<p>1.4. What waste will be generated by this development? What measures were explored to firstly avoid waste, and where waste could not be avoided altogether, what measures were explored to minimise, reuse and/or recycle the waste? What measures have been explored to safely treat and/or dispose of unavoidable waste?</p>	<p>The waste to be generated by the Project includes the following:</p> <ul style="list-style-type: none"> ▪ Construction – <ul style="list-style-type: none"> ○ Waste generated from site preparations (e.g. plant material), domestic waste, surplus and used building material, and hazardous waste (e.g. chemicals, oils, soil contaminated by spillages, diesel rags). Solid waste generated during the construction phase will be temporarily stored at suitable locations (e.g. at the construction camp) and will be removed at regular intervals and disposed of at approved waste disposal sites. All the waste disposed of will be recorded. ○ Wastewater will include sewage, and water used for washing purposes. ▪ Operation – <ul style="list-style-type: none"> ○ Refuse (domestic waste) generated during the operational phase will be removed on a weekly basis and will be disposed of at a permitted waste disposal facility. <p>Mitigation measures to manage all waste and wastewater generated during the construction and operational phases will be included in the EMPr.</p>
<p>1.5. How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</p>	<p>Potential disturbances to cultural heritage may include the following:</p> <ul style="list-style-type: none"> ▪ Possible direct impacts to graves, heritage resources and on below-ground archaeological deposits and fossils as a result of ground disturbance. ▪ Possible impacts to the cultural landscape as a result of the introduction of incompatible structures and infrastructure to the rural landscape

Question No.	Response
	A Heritage Impact Assessment was conducted and the findings are presented in the EIA Report. Heritage finds were plotted against the proposed layout and the necessary amendments made to the layout in order to avoid heritage sensitivities and their prescribed buffers.
<p>1.6. How will this development use and/or impact on non-renewable natural resources? What measures were explored to ensure responsible and equitable use of the resources? How have the consequences of the depletion of the non-renewable natural resources been considered? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</p>	<p>During the construction phase electricity will be obtained from diesel generators and / or temporary supply via cables from the site power grid. No alternative energy sources were considered for the generation of electricity. The generation of electricity will be derived from a renewable energy source, namely, the sun.</p> <p>During the operational phase electricity will be sourced from this renewable energy-generation facility itself and/or from the existing electrical infrastructure on the property.</p>
<p>1.7. How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part? Will the use of the resources and/or impact on the ecosystem jeopardise the integrity of the resource and/or system taking into account carrying capacity restrictions, limits of acceptable change, and thresholds? What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources? What measures were taken to ensure responsible and equitable use of the resources? What measures were explored to enhance positive impacts?</p> <p>1.7.1. Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth or does it reduce resource dependency (i.e. de-materialised growth)? (note: sustainability requires that settlements reduce their ecological footprint by using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve their quality of life).</p> <p>1.7.2. Does the proposed use of natural resources constitute the best use thereof? Is the use justifiable when considering intra- and intergenerational equity, and are there more important priorities for which the resources should be used (i.e. what are the opportunity costs of using these resources this the proposed development alternative?)</p> <p>1.7.3. Do the proposed location, type and scale of development promote a reduced dependency on resources?</p>	<p>The Solar PV Power Plant with BESS proposes to generate electricity from a renewable energy resource, namely the sun. In addition, some of this electricity will be stored in the BESS and will be discharged during evening peak hours when there is no sun. The total generation capacity of the Project will be 240MW renewable solar energy. The use of the resource will not jeopardise the integrity of the resource.</p> <p>Impacts to the receiving environment have been assessed during the EIA Phase and are presented in the EIA Report.</p> <p>The Project is a renewable energy project and will be generating cleaner energy to assist South African in moving away from more 'dirty' forms of energy generation.</p>

Question No.	Response
<p>1.8. How were a risk-averse and cautious approach applied in terms of ecological impacts?</p> <p>1.8.1. What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?</p> <p>1.8.2. What is the level of risk associated with the limits of current knowledge?</p> <p>1.8.3. Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?</p>	<p>The following specialist studies were undertaken to assess the impacts of the Project on the ecological integrity of the area:</p> <ul style="list-style-type: none"> ▪ Aquatic Assessment; ▪ Terrestrial Ecological Assessment; and ▪ Avifaunal Assessment. <p>The findings of the above studies are presented in the EIA Report.</p> <p>The development layout was amended to avoid environmental sensitivities as far as possible as determined by the specialists.</p>
<p>1.9. How will the ecological impacts resulting from this development impact on people's environmental right in terms following:</p> <p>1.9.1. Negative impacts: e.g. access to resources, opportunity costs, loss of amenity (e.g. open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?</p> <p>1.9.2. Positive impacts: e.g. improved access to resources, improved amenity, improved air or water quality, etc. What measures were taken to enhance positive impacts?</p>	<p>Potential impacts to the social environment include the following:</p> <ul style="list-style-type: none"> ▪ Construction phase – <ul style="list-style-type: none"> ○ Influx of people seeking employment and associated impacts (e.g. foreign workforce, cultural conflicts, squatting, demographic changes) ○ Safety and security ○ Use of local road network ○ Nuisance from dust and noise ○ Consideration of local labourers and suppliers in area – stimulation of local economy (positive impact) ○ Transfer of skills (positive impact) ▪ Operational phase – <ul style="list-style-type: none"> ○ Direct and indirect economic opportunities as a result of the Project. ○ Threats to human and animal health from electromagnetic field. <p>A Social Impact Assessment was undertaken, and the findings are presented in the EIA Report. Mitigation measures to manage impacts to the social environment are included in the EMPr.</p>
<p>1.10. Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socio-economic impacts (e.g. on livelihoods, loss of heritage site, opportunity costs, etc.)?</p>	<p>The areas affected by the proposed Project footprint are rural in nature. The Project is located approximately 9km north west of Rustenburg's CBD. The study found that the cattle handling facilities located on the land proposed for the development will be moved to a new position on the remaining part of the farm, the development does not impact on loss of livelihood.</p>
<p>1.11. Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives/targets/considerations of the area?</p>	<p>Refer to the response to question no. 1 above.</p>
<p>1.12. Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the "best practicable environmental option" in terms of ecological considerations?</p>	<p>There were no site alternatives considered.</p> <p>The layout was assessed by the respective specialists during the EIA Phase and was adjusted to avoid sensitive features, as far as possible.</p> <p>Options under consideration are presented in Section 10 below.</p>

Question No.	Response
	The BPEO will be identified in the EIA Report below, taking into consideration of the specialists' findings. This was found to be alternative 2.
1.13. Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and existing and other planned developments in the area?	Other renewable energy applications that have been made within a 30km radius of the PV Site, according to DFFE's REEA Database, are discussed in Section 6.6 above. Cumulative impacts are discussed in Section 13.28 below.
2.1. What is the socio-economic context of the area, based on, amongst other considerations, the following considerations?: 2.1.1. The IDP (and its sector plans' vision, objectives, strategies, indicators and targets) and any other strategic plans, frameworks of policies applicable to the area, 2.1.2. Spatial priorities and desired spatial patterns (e.g. need for integrated of segregated communities, need to upgrade informal settlements, need for densification, etc.), 2.1.3. Spatial characteristics (e.g. existing land uses, planned land uses, cultural landscapes, etc.), and 2.1.4. Municipal Economic Development Strategy ("LED Strategy").	The socio-economic environment is discussed in Section 11.9 below. The following is noted from a planning perspective: <ul style="list-style-type: none"> ▪ One of the goals identified in the municipal IDP (RLM, 2022) to domesticate the Sustainable Development Goals is to promote developments in renewable energy. ▪ The Project will contribute towards both National and Provincial targets for renewable energy and Eskom's target for Independent Power Producer (IPPs), as well as assist in meeting the increasing electricity demands in South Africa and specifically in the grid network. ▪ The PV Site and power line are located outside of the urban edge and should not impact on future urban expansion. ▪ The Project's proposed overhead power line will be aligned existing power lines as far as possible. ▪ According to the findings from the National Web Based Environmental Screening Tool, the PV Site has low sensitivity in terms of the relative civil aviation theme.
2.2. Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area? 2.2.1. Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs?	Refer to the response to question no. 1.9 above.
2.3. How will this development address the specific physical, psychological, developmental, cultural and social needs and interests of the relevant communities?	
2.4. Will the development result in equitable (intra- and inter-generational) impact distribution, in the short- and long-term? Will the impact be socially and economically sustainable in the short- and long-term?	
2.5. In terms of location, describe how the placement of the proposed development will: 2.5.1. result in the creation of residential and employment opportunities in close proximity to or integrated with each other,	2.5.1. The Project will result in increased economic activity, as well as increased opportunities for employment and for SMMEs. 2.5.2. Not deemed to be relevant, due to the nature of the development.

Question No.	Response
<p>2.5.2. <i>reduce the need for transport of people and goods,</i></p> <p>2.5.3. <i>result in access to public transport or enable non-motorised and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms public transport),</i></p> <p>2.5.4. <i>compliment other uses in the area,</i></p> <p>2.5.5. <i>be in line with the planning for the area,</i></p> <p>2.5.6. <i>for urban related development, make use of underutilised land available with the urban edge,</i></p> <p>2.5.7. <i>optimise the use of existing resources and infrastructure,</i></p> <p>2.5.8. <i>opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g. not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement),</i></p> <p>2.5.9. <i>discourage "urban sprawl" and contribute to compaction/densification,</i></p> <p>2.5.10. <i>contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure in excess of current needs,</i></p> <p>2.5.11. <i>encourage environmentally sustainable land development practices and processes,</i></p> <p>2.5.12. <i>take into account special locational factors that might favour the specific location (e.g. the location of a strategic mineral resource, access to the port, access to rail, etc.),</i></p> <p>2.5.13. <i>the investment in the settlement or area in question will generate the highest socio-economic returns (i.e. an area with high economic potential),</i></p> <p>2.5.14. <i>impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area, and</i></p> <p>2.5.15. <i>in terms of the nature, scale and location of the development promote or act as a catalyst to create a more integrated settlement?</i></p>	<p>2.5.3. Goods will be transported to site from Johannesburg and Richard's Bay predominantly according to the Traffic Impact Study. People may need to be transported from the surrounding areas during construction, and less so during operation.</p> <p>2.5.4. The area is rural in nature with agriculture being the main land use practice, and generally grazing. Grazing of small livestock according to the Agricultural study will still be possible under the panels.</p> <p>2.5.5. Refer to the response to question no. 2.1 regarding planning.</p> <p>2.5.6. The PV Site and power line are located outside of the urban edge and should not impact on future urban expansion.</p> <p>2.5.7. The resources and services required for construction and operation are discussed in Section 9 below.</p> <p>2.5.8. The Project does not include the expansion of any bulk infrastructure.</p> <p>2.5.9. Not deemed to be relevant, due to the nature of the development.</p> <p>2.5.10. Not deemed to be relevant, due to the nature of the development.</p> <p>2.5.11. Provision will be made in the EMP to manage the impacts associated with the Project.</p> <p>2.5.12. Locational factors that favour the proposed site include the favourable solar irradiation levels, short distance to grid connection point, flat topography, suitable site access and availability of land.</p> <p>2.5.13. The socio-economic benefits associated with the Project will be further identified in the Section 12 below.</p> <p>2.5.14. Refer to the response to question no. 1.5 above.</p> <p>2.5.15. Refer to the response to question no. 2.1 above regarding planning.</p>
<p>2.6. <i>How were a risk-averse and cautious approach applied in terms of socio-economic impacts?</i></p> <p>2.6.1. <i>What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?</i></p> <p>2.6.2. <i>What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities, critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge?</i></p> <p>2.6.3. <i>Based on the limits of knowledge and the level of risk, how and to what extent was a risk-</i></p>	<p>The findings of the Social Impact Assessment have been included in Section 12, assumptions and limitations are included under Section 8.</p>

Question No.	Response
<i>averse and cautious approach applied to the development?</i>	
<p>2.7. How will the socio-economic impacts resulting from this development impact on people's environmental right in terms following:</p> <p>2.7.1. Negative impacts: e.g. health (e.g. HIV-Aids), safety, social ills, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?</p> <p>2.7.2. Positive impacts. What measures were taken to enhance positive impacts?</p>	<p>Refer to the responses to questions no. 1.9 and 2.1 above.</p> <p>Social impact assessment can be viewed under Section 13.26.</p>
<p>2.8. Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socio-economic impacts will result in ecological impacts (e.g. over utilisation of natural resources, etc.)?</p>	<p>Refer to the responses to questions no. 1.7 and 1.10 above.</p>
<p>2.9. What measures were taken to pursue the selection of the "best practicable environmental option" in terms of socio-economic considerations?</p> <p>2.10. What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)?</p> <p>Considering the need for social equity and justice, do the alternatives identified, allow the "best practicable environmental option" to be selected, or is there a need for other alternatives to be considered?</p>	<p>The BPEO has been identified, taking into consideration the specialists' findings. Alternative 2 has been selected as the BPEO.</p>
<p>2.11. What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination?</p>	<p>The areas affected by the proposed Project footprint are rural in nature. The PV Site is vacant, used for grazing. Consent has been provided by the landowner for the proposed development in terms of the Option to Lease Agreement.</p>
<p>2.12. What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle?</p>	<p>The findings of the Social Impact Assessment are included in the EIA Report. Mitigation measures to manage these impacts are included in the EMP. Also refer to the response to question no. 1.9 above.</p>
<p>2.13. What measures were taken to:</p> <p>2.13.1. ensure the participation of all interested and affected parties,</p> <p>2.13.2. provide all people with an opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation,</p> <p>2.13.3. ensure participation by vulnerable and disadvantaged persons,</p>	<p>Section 15 below provides an overview of the public participation process to date, which includes the following:</p> <ul style="list-style-type: none"> ▪ Compiling the database of I&APs; ▪ Notification provided during the announcement phase; ▪ Notification of review of the draft Scoping Report; ▪ Means of accessing the draft Scoping Report;

Question No.	Response
<p>2.13.4. <i>promote community wellbeing and empowerment through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means,</i></p> <p>2.13.5. <i>ensure openness and transparency, and access to information in terms of the process,</i></p> <p>2.13.6. <i>ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition were given to all forms of knowledge, including traditional and ordinary knowledge, and</i></p> <p>2.13.7. <i>ensure that the vital role of women and youth in environmental management and development were recognised and their full participation therein were be promoted?</i></p>	<ul style="list-style-type: none"> ▪ Supplying copies of the draft Scoping Report to authorities; and ▪ Commenting on the draft Scoping Report. <p>Comments received from authorities and I&APs during the process are included in the CRR and will be submitted with the final EIA Report.</p>
<p>2.14. <i>Considering the interests, needs and values of all the interested and affected parties, describe how the development will allow for opportunities for all the segments of the community (e.g.. a mixture of low-, middle-, and high-income housing opportunities) that is consistent with the priority needs of the local area (or that is proportional to the needs of an area)?</i></p>	<p>The findings of the Social Impact Assessment are included in the EIA Report. Also refer to the responses to questions no. 1.9 and 2.5 above.</p>
<p>2.15. <i>What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected?</i></p>	<p>Health and safety related risks associated with the Project during the construction and operational phases are assessed in the EIA Report. These risks are addressed through mitigation measures that will be included in the EMP. Additional management requirements will be included in the Project's Occupational Health and Safety system.</p>
<p>2.16. <i>Describe how the development will impact on job creation in terms of, amongst other aspects:</i></p> <p>2.16.1. <i>the number of temporary versus permanent jobs that will be created,</i></p> <p>2.16.2. <i>whether the labour available in the area will be able to take up the job opportunities (i.e. do the required skills match the skills available in the area),</i></p> <p>2.16.3. <i>the distance from where labourers will have to travel,</i></p> <p>2.16.4. <i>the location of jobs opportunities versus the location of impacts (i.e. equitable distribution of costs and benefits), and</i></p> <p>2.16.5. <i>the opportunity costs in terms of job creation (e.g. a mine might create 100 jobs, but impact on 1000 agricultural jobs, etc.).</i></p>	<p>The Project will have a beneficial impact on local employment during the construction and operational phases.</p> <p>The exact number of employment opportunities was not available at the time of writing the report. There would be a larger number of opportunities during construction than operation. Labour will be sourced locally first and thereafter from surrounding areas where necessary. It is expected that more jobs will be created than might be lost.</p>
<p>2.17. <i>What measures were taken to ensure:</i></p> <p>2.17.1. <i>that there were intergovernmental coordination and harmonisation of policies, legislation and actions relating to the environment, and</i></p>	<p>There were no conflicts of interest.</p> <p>SA's commitment to renewable energy is reflected in its ratification of the Paris Agreement and the country's long-term energy planning iterations. Solar power represents a large component of the needed diversification of SA's electricity system.</p>

Question No.	Response
<p>2.17.2. <i>that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures?</i></p>	<p>According to the Department of Energy (2017), energy is by nature an intergovernmental issue, cutting across energy security, economic prosperity, employment and environment, among others. In recognising these benefits, clean energy has been incorporated into the broader policy framework.</p> <p>The White Paper on Renewable Energy of 2003 is one of SA's policy documents that laid the foundation for the promotion of renewable energy technologies such as solar, hydro, biomass and wind (http://www.energy.gov.za/files/renewables_frame.html). Through this policy document, a ten year target of how renewable energy technologies could diversify the country's energy mix and secure cleaner energy was set.</p> <p>The Applicant intends to bid for the current and future REIPPPP bid windows and/or other renewable energy markets within SA. The REIPPPP is a competitive tender process that was designed to facilitate private sector investment into grid-connected renewable energy (RE) generation in SA.</p>
<p>2.18. <i>What measures were taken to ensure that the environment will be held in public trust for the people, that the beneficial use of environmental resources will serve the public interest, and that the environment will be protected as the people's common heritage?</i></p>	<p>The Solar PV Plant proposes to generate electricity from a renewable resource, namely the sun. The total generation capacity of the Project will be up to 240MW renewable solar energy. Some of the electricity generated from the renewable energy source will be stored in the BESS which may generate electricity during peak evening hours when the sun goes down. During the distribution of electricity, as the energy source is renewable, there will be no Greenhouse Gas Emissions (GHG), such as Carbon Dioxide, that will be released into the atmosphere, thus providing a clean environment for the local community and public in general.</p> <p>Impacts to the receiving environment have been assessed through various specialist studies that are included in the EIA Report. See Section 13.</p>
<p>2.19. <i>Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?</i></p>	<p>The intention is for the mitigation measures that will be included in the EIA Report and EMPr to be realistic and for the residual risks to be managed to an acceptable level.</p>
<p>2.20. <i>What measures were taken to ensure that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects will be paid for by those responsible for harming the environment?</i></p>	<p>The solar PV facility will have an estimated lifespan of 25 years. It is at this time impossible to accurately predict the exact nature of the surrounding environment in 25 years' time or whether the area would have developed to the point where the solar PV facility will be upgraded to continue providing electricity, or decommissioned. Decommissioning of facilities that require environmental authorisation such as the solar PV facility is also a listed activity in terms of NEMA and will thus require the decommissioning and closure to be approved by the relevant authorities at the time, based on the current legislative framework. However, it is also not possible to predict the legal framework in 25 years' time. For the purposes of this EIA, it is assumed that the facility will</p>

Question No.	Response
	eventually be decommissioned, and the site rehabilitated.
<p><i>2.21. Considering the need to secure ecological integrity and a healthy bio-physical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the best practicable environmental option in terms of socio-economic considerations?</i></p>	<p>The BPEO has been identified, taking into consideration the specialists' findings. Alternative 2 has been selected as the BPEO.</p>
<p><i>2.22. Describe the positive and negative cumulative socio-economic impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and other planned developments in the area?</i></p>	<p>Other renewable energy applications that have been made within a 30km radius of the PV Site, according to DFFE's REEA Database, are discussed in Section 6.6 above.</p> <p>Cumulative impacts are discussed in Section 13.3 below.</p>

8 PROJECT DESCRIPTION

8.1 Solar Technology

Solar energy facilities operate by converting solar energy into a useful form (i.e. electricity). The use of solar energy for electricity generation is a non-consumptive use of a natural resource and consumes no fuel for continuing operation. Solar power produces an insignificant quantity of greenhouse gases over its lifecycle as compared to conventional coal-fired power stations. The operational phase of a solar facility does not produce carbon dioxide, sulphur dioxide, mercury, particulates, or any other type of air pollution, as fossil fuel power generation technologies do.

8.2 PV Technology Overview

PV technology produces direct current (DC) which is then converted to alternating current (AC) via power electronic inverters. The main technology categories are crystalline modules (mono or poly), thin film, and concentrated photovoltaics (CPV). **Figure 8** below provides an overview of a typical Solar PV Power Plant.

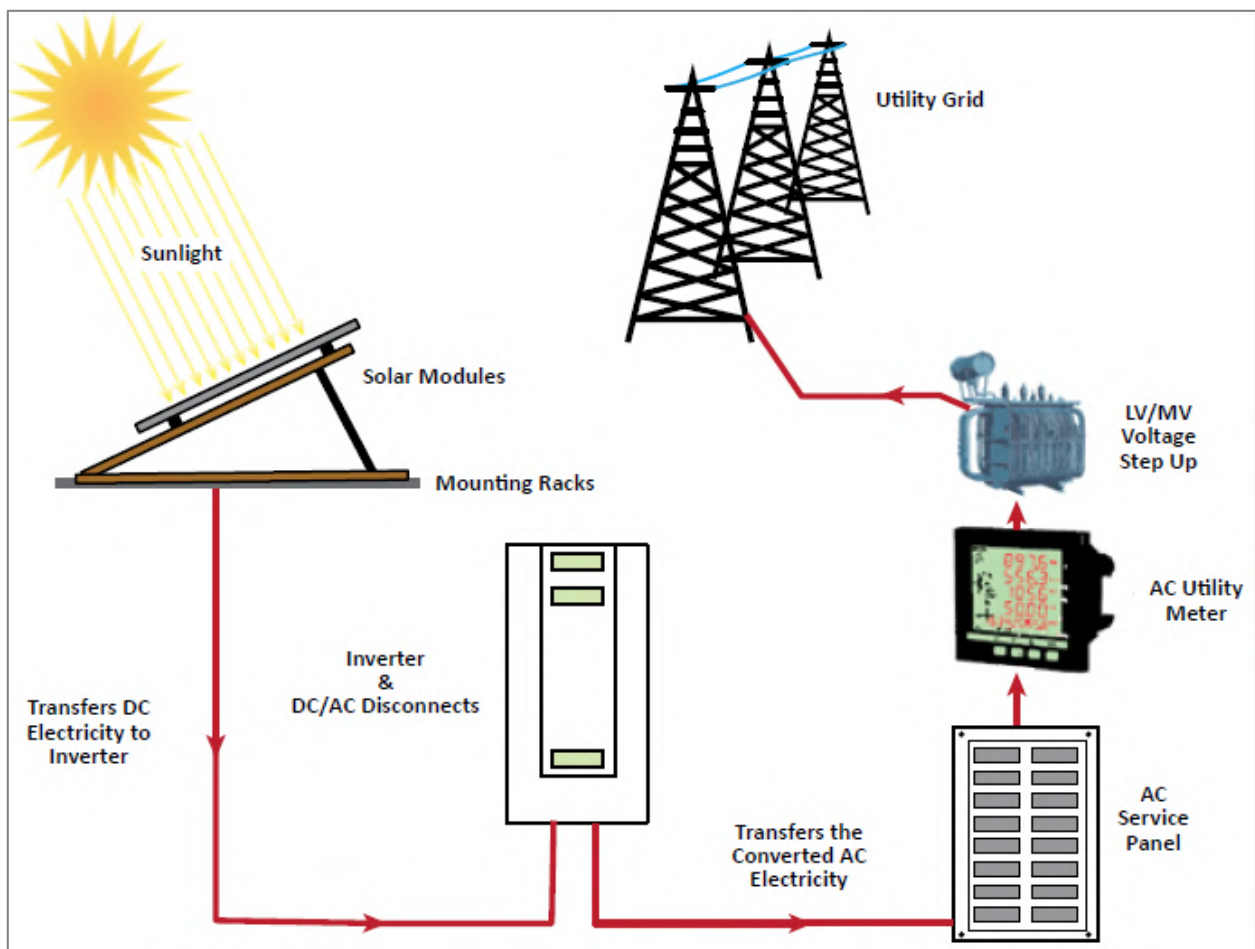


Figure 8: Overview of Solar PV Power Plant (IFC, 2015)

8.3 Project Overview

8.3.1 *Overview of Technical Details*

The technical details of the proposed Solar PV Plant are captured in **Table 10** below.

Table 10: Technical details of the proposed PV Plant

No.	Component	Description / Dimensions	
		Alternative 1	Alternative 2
▪	Height of PV panels	Up to 5.5 m	Up to 5.5 m
▪	Area of PV Array	Up to approximately 469.5 ha	Monofacial or Bifacial PV panels, mounted on either fixed-tilt, single-axis tracking, and/or double-axis tracking systems. Up to 390 ha
▪	Area occupied by substations	Up to 1 ha	Up to 1 ha
▪	Capacity of on-site substation	The facility substation will collect the power from the facility and transform it from medium voltage (up to 33kV) to high voltage (132 kV).	The facility substation will collect the power from the facility and transform it from medium voltage (up to 33kV) to high voltage (132 kV).
▪	BESS	Area up to ± 5 ha	Area up to ± 5ha
▪	Area occupied by both permanent and construction laydown areas	Temporary: Up to 7 ha Permanent: Up to 1 ha (located within the area demarcated for temporary construction laydown)	Temporary: Up to 7ha Permanent: Up to 1 ha (located within the area demarcated for temporary construction laydown)
▪	Area occupied by buildings	Up to 1.5 ha	Up to 1.5 ha
▪	Length of internal roads	Up to 33 km	Up to 33 km
▪	Width of internal roads	The internal roads will be up to 6 m wide. The access roads will be up to 8 m wide.	The internal roads will be up to 6 m wide. The access roads will be up to 8 m wide.
▪	Proximity to grid connection	±5-6 km	Approximately 5 - 6 km
▪	Height of fencing	Up to 3.5 m	Up to 3.5m
▪	Type of fencing	Type will vary around the site, welded mesh, palisade and electric fencing	Type will vary around the site, welded mesh, palisade and electric fencing

8.3.2 *Project Layout*

The layout options of the PV Plant are shown in **Figure 9** and **Figure 10** below. Alternative 1 was proposed prior to specialists' inputs during the Scoping Phase of the application. Layout alternative 2 was proposed in response to the site sensitivity inputs from the various specialists and therefore takes the environmental

sensitivities on the site into consideration as far as possible. The desirability of the earmarked site for the proposed Solar PV Plant is due to the following key characteristics:

- ❑ **Solar Irradiation:** The feasibility of a solar facility, especially a Solar Park of this magnitude, is dependent on the direct solar irradiation levels (refer to **Section 4.1** above).
- ❑ **Topography:** The suitability of the surface area is an important characteristic for the construction and operation of solar facilities. Most of the site has a low gradient slope and is suitable for this development.
- ❑ **Grid connection:** The Project will transfer the electricity via 132 kV powerlines from the Eskom collector switching station, located adjacent to the facility substation, to the Ngwedi MTS.
- ❑ **Extent of site:** The overall extent of the site is sufficient for the installation of the PV facility.
- ❑ **Site access:** The site can be accessed via Lindleyspoort Road (off the R565) which runs along the southern boundary of the site.

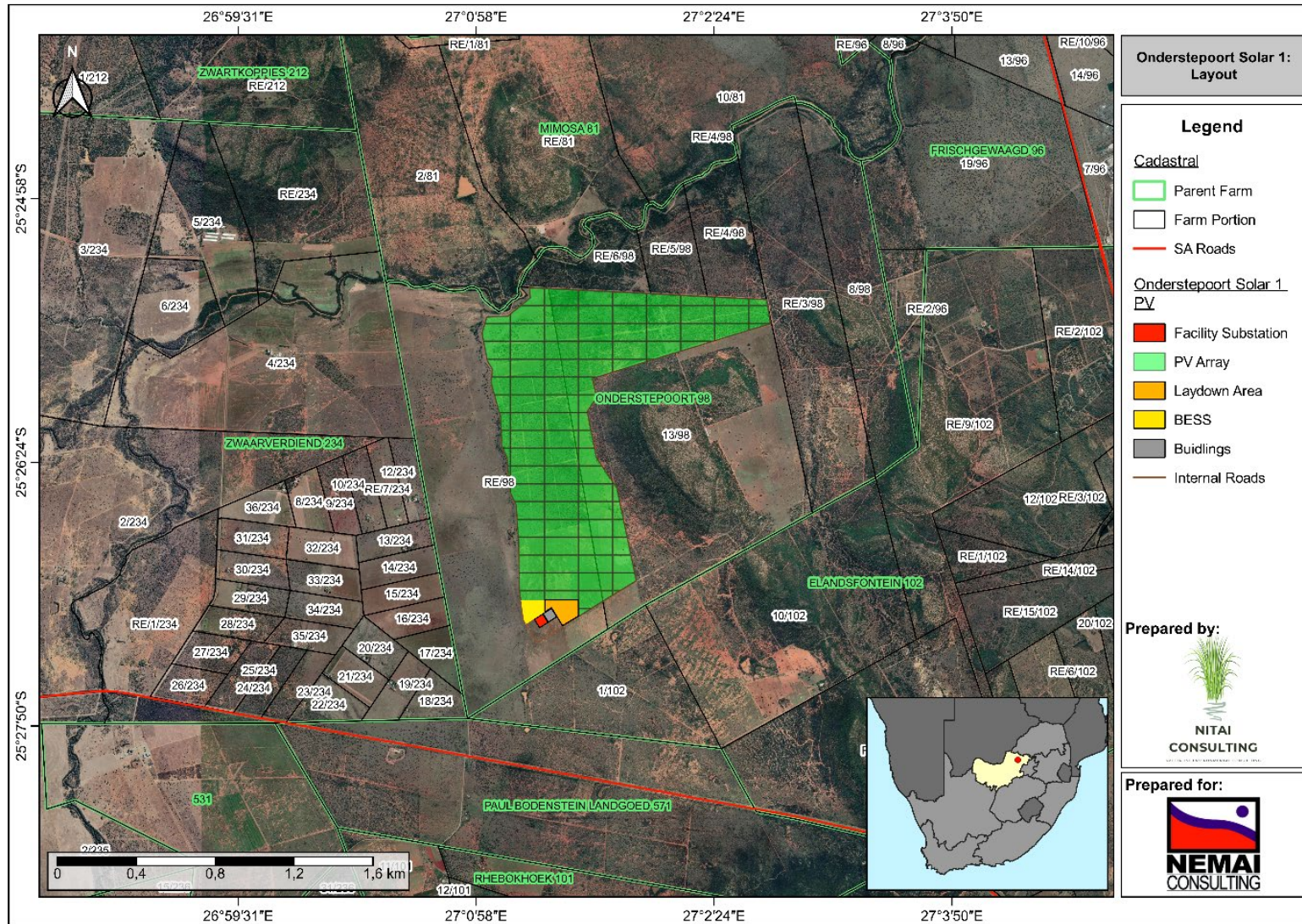


Figure 9: Proposed Layout of the Solar PV Plant - PV Layout Alternative 1

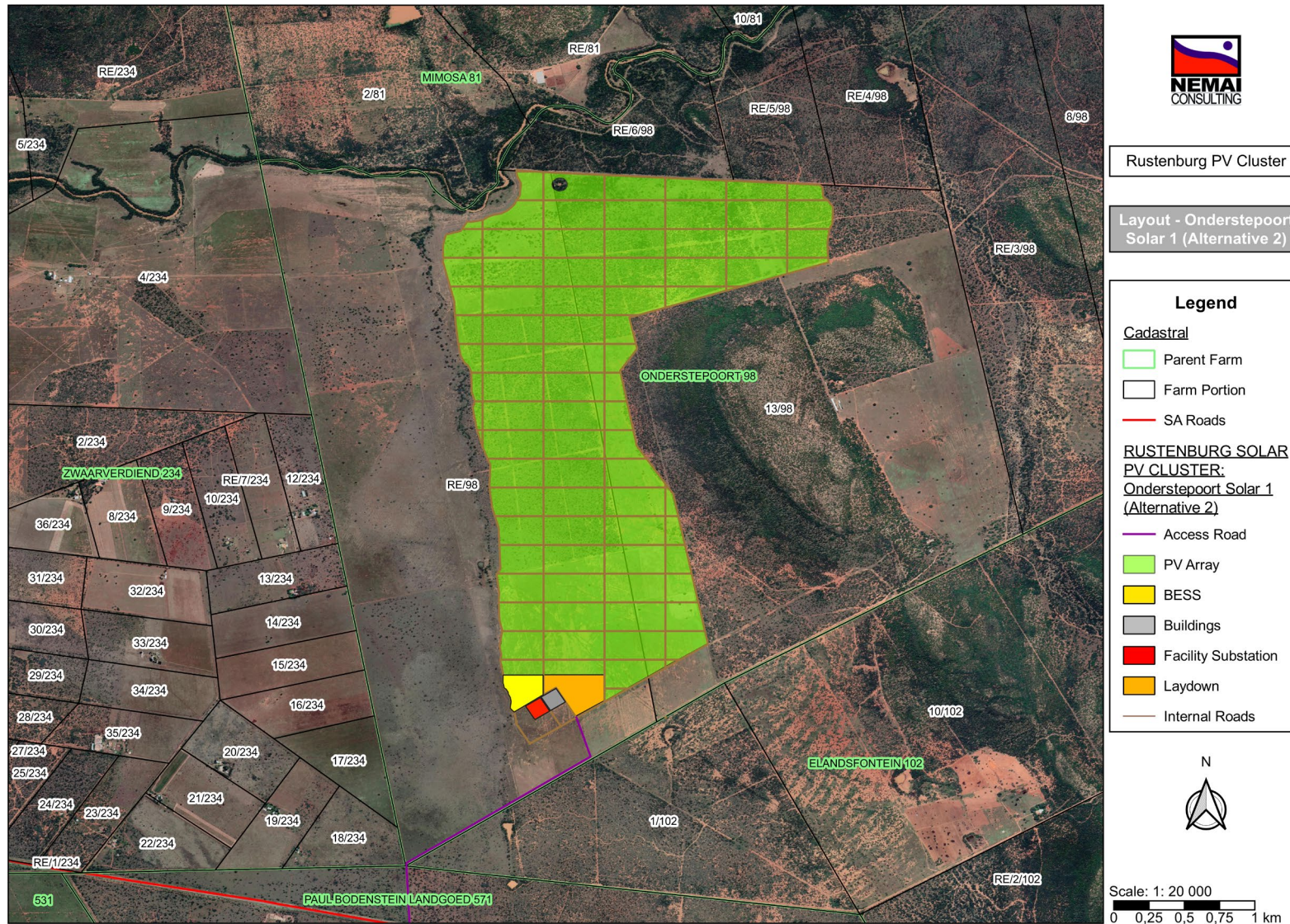


Figure 10: Proposed Layout of the Solar PV Plant - PV Layout Alternative 2 (preferred)

The following factors were considered in determining the layouts (amongst others):

- Requirements of the PV Plant;
- Understanding of sensitive features on the site (e.g., watercourses); and
- Existing servitudes and infrastructure.

8.3.3 *Components of the Proposed Solar PV Plant*

The Project consists of the following systems, sub-systems or components (amongst others):

- PV modules and mounting structures which will consist of either Monofacial or Bifacial PV panels, mounted on either fixed-tilt, single-axis tracking, and/or double-axis tracking systems.
- Inverters and transformers.
- Battery Energy Storage System (BESS) area up to 5ha.
- Operation and Maintenance buildings including a gate house and security building, control centre, offices, warehouses and workshops for storage and maintenance.
- Facility grid connection infrastructure, including:
 - o 33kV cabling between the project components and the facility substation
 - o A 132kV facility substation
 - o 33kV or 132kV cabling or powerline between the facility substation and the proposed Eskom collector switching station.
- Temporary construction laydown area up to 7ha.
- Permanent laydown area up to 1 ha (to be located within the area demarcated for the temporary construction laydown).
- Internal roads will be up to 6 m wide, to allow access to the Solar PV modules for operations and maintenance activities.
- Main access road is up to 8 m wide. The site is accessible via the Lindleyspoort Road (off the R565).

The components of the proposed Solar PV Facility are discussed below. Reference Source: Solar Power Plant - Types, Components, Layout and Operation (<https://www.electricaltechnology.org/>).

8.3.3.1 Solar PV Panels/Modules

A PV panel is the most important component of a solar power plant. It is made up of small solar cells. This is a device that is used to convert solar photon energy into electrical energy.

Generally, silicon is used as a semiconductor material in solar cells. The typical rating of silicon solar cells is 0.5V and 6Amp. And it is equivalent to 3W power. The number of cells is connected in series or parallel and makes a module. The number of modules forms a solar panel.

According to the capacity of power plants, a number of plates are mounted and a group of panels is also known as a PV array.

8.3.3.2 Single Axis Trackers

The following information was sourced from Solar Basics: Single-Axis Tracking (<https://www.powerflex.com/>).

A solar tracking system adjusts the position of a solar panel along an axis. This is done to ensure a small angle of incidence or the angle that sunlight hits a solar panel. Since the energy output of a solar system increases as the angle of incidence decreases, keeping this angle as small as possible is ideal. Active trackers rely on powered machineries such as gears and motors to move solar panels, whereas passive trackers achieve motion via compressed fluid that shifts sides when heated by the sun, changing the tilt of the panel along with it. Some trackers keep panels aligned with the sun by moving them in the opposite direction of the earth's rotation, and others determine an optimal panel angle based on latitude and longitude data obtained through GPS.

In addition to varying methods of motion, solar trackers differ in terms of the number of axes on which they move. Single axis tracking systems tilt on one axis, tracking the sun as it moves from east to west during the day.

An example of PV modules mounted on a single axis tracker is shown in **Figure 11** below.



Figure 11 Example of PV Module mounted on Single Axis Tracker

(source: Single-ACES – Atlantic Clean Energy Supply – Official Site [<https://atlanticces.com/>])

The trackers are mounted on steel posts installed in the ground. Concrete bases are sometimes also used. The site would need to be cleared of all trees to prevent shading of the PV modules. The ground between the trackers is usually left grassed for large-scale projects.

8.3.3.3 Inverters

The following information was sourced from “A Guide to Solar Inverters: how they work and how to choose them” (<https://solarmagazine.com/>).

A solar inverter is really a converter. Inverters are installed to convert the DC electrical power into AC electrical power, which is used in the grid. The frequency of the AC electricity is synchronised

to the grid, which in SA is 50Hz, but varies slightly. The purpose of the inverters is to maximise and control the conversion of power from the DC modules to low voltage AC (i.e., less than 1000V).

String inverters have multiple inputs for connecting the strings from the trackers. String inverters are normally installed on steel structures under the shade of the PV modules.

8.3.3.4 Low Voltage AC Cabling

AC cables are installed from the inverters to the distribution box located adjacent to the medium voltage transformers. These cables are installed underground in trenches.

8.3.3.5 Medium Voltage Step-Up Transformers

The purpose of medium voltage transformers is to step-up the low voltage to medium voltage. In order to distribute the combined electrical power from a block of tracker rows the voltage is required to be increased. Transformers will typically be in the order of 2.5MVA capacity and similar in appearance to the type as shown in **Figure 12** below.



Figure 12: Example of Medium Voltage Transformer
(source: <https://www.ulaginoli.com/>)

Transformers will typically be filled with oil for cooling the transformer windings. The cooling oil is circulated through radiator fins mounted on the side of the transformer. The oil remains in the transformer. Oil spills from transformers need to be contained by providing drip trays and special care taken to clean up the spill should it occur.

8.3.3.6 Medium Voltage AC Cabling

Medium voltage AC cabling from the transformers to the high voltage substation is buried in trenches underground. The cables are protected from accidental damage by placing brightly

coloured orange danger tape in the trench and sometimes concrete slabs. Cable routes are indicated with concrete cables markers on the ground at bend points, road crossings etc.

8.3.3.7 High Voltage Substations

The medium voltage cables are connected to a medium voltage switchgear room located in a substation yard. High voltage transformers step the medium voltage up to high voltage.



Figure 13: Example of High Voltage Substation

(source: <https://www.protoenergy.com/>)

A typical HV Substation will look like the substation shown in **Figure 13** above, with large ground mounted transformers and outdoor high voltage switchgear with overhead conductors and steel lattice structures. The yard is fenced off and only authorised personnel are allowed inside the high voltage yard (see example shown in **Figure 14** below).



Figure 14: Example of High Voltage Transformers

(source: <https://www.electricityforum.com/>)

8.3.3.8 Guardhouses, Operation, Maintenance and Visitor Centre Buildings

Guardhouses, Operation, Maintenance and Visitor Centre Buildings are required for the facility. Buildings will be single story.

The purpose of the buildings is to provide space for staff working on site for the operation and maintenance of the facilities, including storage space for spare parts, tools, etc. Computers will be installed for monitoring the electricity generation and reporting on the condition of the plant. Toilets, kitchens, water, wastewater, and electricity will be required for staff and visitors.

Sustainable building principals will be used including use of rainwater harvesting, energy efficient lighting, insulation, etc.

8.3.3.9 Roads

Existing roads are located on the site. These will serve as the entrance roads to the site. Existing access from main roads will need to be upgraded. The internal roads will vary from 6m to 8m wide and will be gravel, with the exception of paving close to the buildings for parking and access into the buildings. The entrance road will be up to 8m wide.

The basic layout consists of rows of single axis trackers, similar to that shown in **Figure 15** below.



Figure 15: Example of Roads Between Trackers and Medium Voltage Substations
(source: <https://ecoinventos.com/>)

8.3.3.10 Fencing, Security and Lighting

Fencing is required to secure the site. Due to the voltage of the DC wiring (up to 1500V) and high value of the plant the site must be secured. Details of the fencing is still to be finalised and may include electric fencing.

CCTV cameras and security lighting may be installed as part of the security for the plant.

8.3.3.11 Stormwater Infrastructure

The topography of the site is relatively flat, which simplifies the management of stormwater runoff as high velocities in surface drainage channels and pipes underground drainage systems need not be dealt with. Furthermore, surface stormwater drainage channels can be employed to advantage (easier to maintain than an underground pipe system).

8.4 Battery Energy Storage System

8.4.1 *Types of Electrical Energy Storage Systems*

Electrical Energy storage systems consist of Mechanical, Chemical, Electrical, Thermal and Electrochemical systems. **Figure 16** below summarizes the various Electrical Energy Storage systems. The Electrochemical/battery storage system was selected as the preferred solution to meet the requirements of the Project.

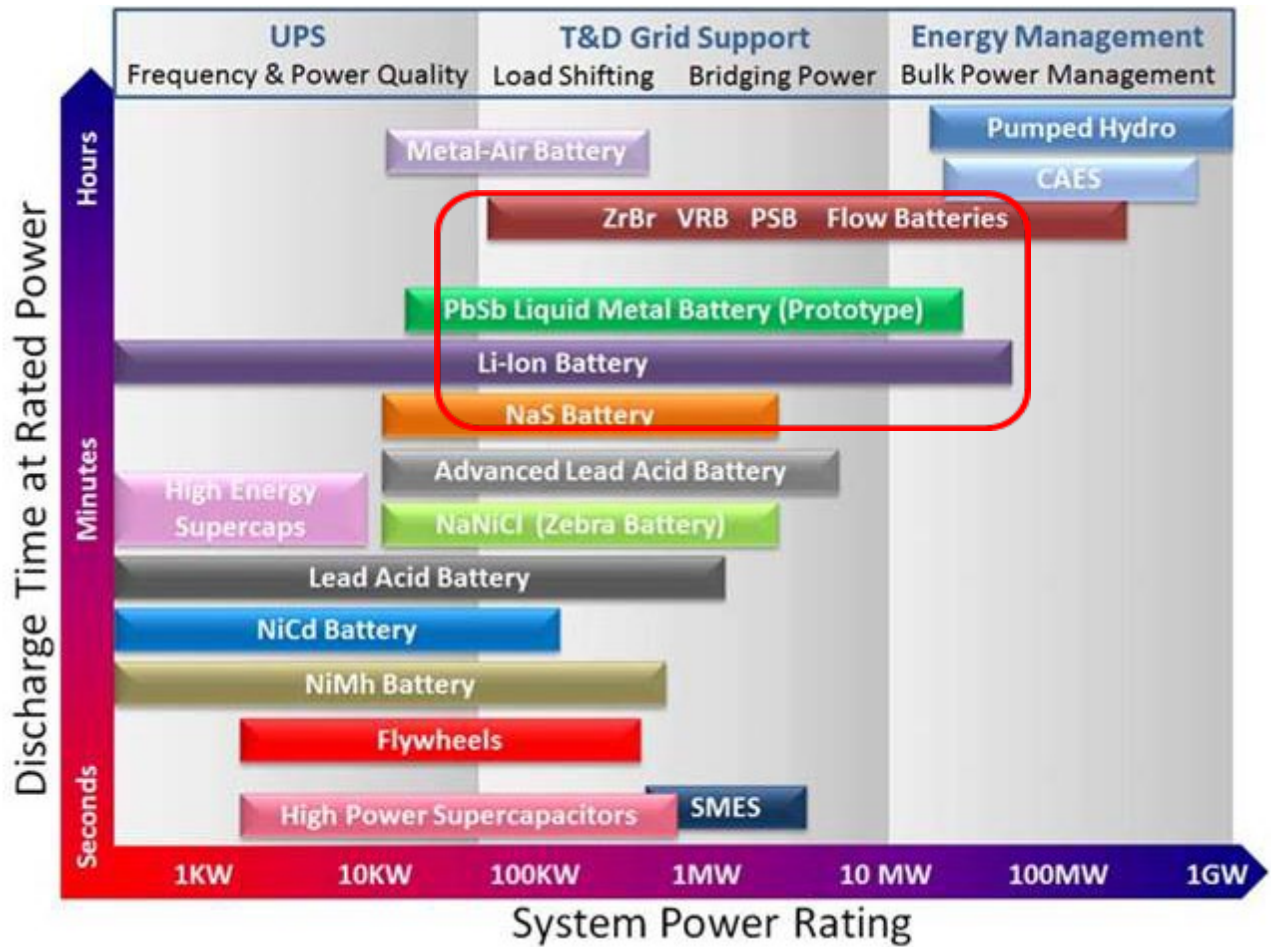


Figure 16: Grid Energy Storage Technologies and Applications
 (Adapted from Climate Policy Initiative for the Energy Transitions Committee)

As per <https://www.smart-energy.com/>, “Batteries, the oldest, most common and widely accessible form of storage, are an electrochemical technology comprised of one or more cells with a positive terminal named a cathode and negative terminal or anode. Batteries encompass a range of chemistries. The best known and in widespread use in portable electronic devices and vehicles are lithium-ion and lead acid. Others solid battery types are nickel-cadmium and sodium-sulphur, while zinc-air is emerging. Another category is flow batteries with liquid electrolyte solutions, including vanadium redox and iron-chromium and zinc-bromine chemistries”.

8.4.2 The Project’s BESS Infrastructure

The total capacity of the BESS is up to a maximum of 5 ha. The technology will be the commercially proven solid state battery systems comprising of the Lithium Ion technology.

As per <https://www.smart-energy.com/>, “This type of technology is widely used in mobile phones and electric vehicles. It is also predominantly used in large utility scale projects”. The batteries generally arrive on site from the factory fully-assembled and pre-tested in containerised/modular enclosures.

The number of containers required will depend on the specific manufacturer. The approximate dimensions of each container will be up to a maximum of 12m long, 3m wide and 3m high. Level and fenced off platforms

would be created for the battery storage areas of approximately 3 000m². The location of the battery energy storage facility will be adjacent to the solar power plant's on-site substation.

An example of similar utility scale BESS is shown in **Figure 17** below.



Figure 17: Example of BESS installation
(<https://biiworld.com/>)

The containers are environmentally friendly during their life-cycle. However, the Lithium in the technology is considered hazardous / dangerous goods. Used batteries will be removed by the suppliers. Batteries containing chemistries that when charged are a fire risk and at the end of their life need to be recycled. With regard to the fire risk, the battery storage area will have a non-flammable buffer area to prevent the spread of fire. The BESS will have electrical and fire protection measures in the form of battery temperature monitoring, circuit breakers, fire detection and fire suppression as per fire and electrical regulations.

8.5 Grid Connection

The electricity generated by the proposed Solar PV Plant will be transferred to the national Eskom grid via 132 kV powerlines. The facility substation will connect to a new 132 kV Eskom collector switching station which will then connect to the existing Eskom Ngwedi Main Transmission Substation (MTS) via 132kV powerlines. The Eskom collector switching station and 132 kV powerline to the Ngwedi MTS is being assessed as part of a separate EA application.

Examples of a 132 kV transmission line as well as a high voltage transmission line connecting to a substation are shown in **Figure 18** and **Figure 19** below, respectively.



Figure 18: Example of a 132 kV transmission line



Figure 19: Example of High Voltage Transmission Line Connecting to Substation

8.6 Implementation Programme

Key milestones during the Project's implementation programme include the following:

- Preferred Bidder Status: Q4 2023;
- Financial Close: Q2 2023;
- Notice to proceed (commencement of construction): Q4 2023; and
- Commercial Operation Date (COD): Q1 2025.

8.7 Project Life-Cycle

The project life-cycle for a typical Solar PV Plant includes the following primary activities (high level outline only):

- Feasibility phase - This phase includes confirming the feasibility of the Project by evaluating and addressing the following (amongst others) –
 - Solar resource assessment;
 - Site selection;
 - Project land allocation;
 - Project yield assessment;
 - Permitting and licensing;
 - Legal agreements;
 - Socio economic development;
 - Industrialisation and localisation;
 - Project cost determination;
 - Project financing; and
 - Risk analysis.
- Design phase - This phase includes the following (amongst others) –
 - Confirming key design features such as the type of PV module to be used, tilting angle, mounting and tracking systems, inverters, and module arrangement;
 - Confirming specifications for the components of the Solar PV Plant and BESS;
 - Preparing detailed designs (layout, civil, electrical);
 - Preparing construction plans;
 - Preparing the Project schedule; and
 - Preparing the commissioning plans.
- Construction phase – During the implementation of the Project, the following construction activities will be undertaken –
 - Pegging the footprint of the development;
 - Establishing access roads;
 - Preparing the site (fencing, clearing, levelling and grading, etc.);
 - Establishing the site office;

- Establishing laydown areas and storage facilities;
 - Transporting equipment to site;
 - Undertaking civil, mechanical and electrical work; and
 - Reinstating and rehabilitating working areas outside of permanent development footprint.
- Operational phase - Once the solar park is up and running the facility will be largely self- sufficient. Operational activities associated with the maintenance and control of the Solar PV Plant will include the following (amongst others) –
- Testing and commissioning the facility’s components;
 - Cleaning of PV modules;
 - Controlling vegetation;
 - Managing stormwater and waste;
 - Conducting preventative and corrective maintenance; and
 - Monitoring of the facility’s performance.
- Decommissioning –
- PV panels are guaranteed to produce at least 80% of their rated power for 20 to 30 years. In practice, PV panels will perform satisfactorily well beyond this timeframe. At the end of the 20-30 year lifespan, two scenarios exist for the PV panels:
 - The old, redundant panels can be disposed of (at a registered disposal facility designated for this purpose); or
 - The panels can be recycled, by either using their components to fix or make new panels, or be donated for use elsewhere (e.g., for the electrification of rural schools and clinics).
 - It is unlikely that the PV Park will be decommissioned after 30 years. Instead, the facility will continually be reconditioned as the PV panels are recycled and replaced with more advanced technology, as it becomes available.
 - In the event that the facility must be decommissioned, the decommissioning phase will include measures for complying with the prevailing regulatory requirements, rehabilitation and managing environmental impacts in order to render the affected area suitable for a future desirable use.

8.8 Resources and Services required for Construction and Operation

This section briefly outlines the resources that will be required to execute the Project. Note that provision is made in the EMP to manage impacts associated with aspects listed below, as relevant.

8.8.1 Raw Materials

Construction

Material required for construction purposes, including fencing and construction material (e.g., cement, sand, aggregate, etc.), will be sourced from suitable suppliers. The PV modules and other components of the facility will also be sourced from accredited suppliers.

Operation

During the operational phase, few raw materials will be required. Material such as consumable spares will be used for the operation of the facility.

8.8.2 Water

Construction

Four options will be considered, in order of priority:

1. Supply from the Local Municipality (LM) – the Applicant will approach the LM to enquire whether they can provide all or part of the total water requirements of the Project. Specific arrangements will be agreed with the LM in a Service Level Agreement (SLA), following the appointment of preferred bidder during the financial close period.
2. Supply from a Private Contractor, which may include extraction from any bulk water supply lines nearby to the site.
3. An existing borehole on site, subject to NWA requirements.
4. A new borehole on site, subject to NWA requirements.

Operation

Water use requirements for a Solar PV Plant during the operational phase depend on the technology and climate conditions at the site. In general, solar power technologies use relatively low volumes of water for cleaning solar collection and reflection surfaces like PV panels, as well as for domestic consumption by the staff.

Water will be supplied by one of four options being considered, in order of priority:

1. Supply from the Local Municipality (LM) – the Applicant will approach the LM to enquire whether they can provide all or part of the total water requirements of the Project. Specific arrangements will be agreed with the LM in a Service Level Agreement (SLA), following the appointment of preferred bidder during the financial close period.
2. Supply from a Private Contractor, which may include extraction from any bulk water supply lines nearby to the site.
3. An existing borehole on site, subject to NWA requirements.
4. A new borehole on site, subject to NWA requirements.

8.8.3 Sanitation

Construction

Chemical toilets will be utilised during construction, and removed/ emptied by an appointed contractor for treatment at a licensed facility off site.

Operation

No effluent will be produced during operation of the facility, except for normal sewage from site and operations staff. This will be collected and treated as per normal standards using a septic or conservancy tank. In cases where the LM does not permit the use of septic tanks, sewage will be stored in conservancy tank and collected (honey-sucker) by a service provider (the LM/ Contractor) and treated at an approved facility off site.

8.8.4 Waste

Construction

During the construction phase, solid waste will mainly be in the form of construction material, excavated substrate and domestic solid waste. All waste will be disposed of in scavenger proof bins and temporarily placed in a central location for removal by an appointed contractor. Any other waste and excess material will be removed once construction is complete and disposed of at a registered waste facility. During the EIA, the applicant will request confirmation from the municipality that they have sufficient capacity at their registered landfills for the solid waste.

Wastewater, which refers to any water adversely affected in quality through construction-related activities and human influence, will include the following:

- Sewage;
- Water used for washing purposes (e.g., equipment, staff); and
- Drainage over contaminated areas (e.g., workshop, equipment storage areas).

Suitable measures will be implemented to manage all wastewater generated during the construction period.

Operation

Refuse generated during the operational phase will be removed on a weekly basis and will be disposed of at licenced waste disposal sites.

8.8.5 Roads

Construction

Temporary access roads will be created during the construction phase. The areas affected by temporary roads will be reinstated, as they will not be used permanently in the operational phase.

Operation

The site can be accessed via Lindleyspoort Road (off the R565) which runs along the southern boundary of the site.

8.8.6 Stormwater

Construction

Best environmental practices will be implemented during construction to manage stormwater. These measures are included in the EMPr.

Operation

The stormwater run-off along the main access road will be controlled by side swales and dispersed in a controlled manner at regular intervals. Stormwater run-off from the buildings will be disposed of through soakaways. A formal piped stormwater system is not envisaged for the wider site. Water will be managed on the surface and dispersed into natural drainage routes.

8.8.7 *Electricity*

Construction

Electricity supply during construction will be provided by either diesel generators or arranged with the LM or Eskom Distribution, via an 11kV or 22kV feeder line.

Operation

The electricity will be supplied by the plant during daylight hours (off-peak times – 07:00 to 17:00). The BESS will supply electricity during night hours (peak times – 05:00 to 07:00 and 17:00 to 19:00). During other times, electricity will be supplied from the power grid.

8.8.8 *Laydown Areas*

Construction

A laydown area will be required during the construction phase. The proposed temporary laydown area of approximately 7ha.

Operation

There will be a smaller permanent laydown area of 1ha during operation.

8.8.9 *Construction Workers*

Construction

The appointed Contractor will mostly make use of skilled labour for the construction of the facility and its associated infrastructure. In those instances where casual labour is required, the Applicant will request that such persons are sourced from local communities, as far as possible.

9 ALTERNATIVES

9.1 Introduction

Alternatives are the different ways in which the Project can be executed to ultimately achieve its objectives. Examples could include carrying out a different type of action, choosing an alternative location or adopting a different technology or design for a project.

The sub-sections to follow discuss the project alternatives considered during the EIA process. A comparative analysis of feasible alternatives from environmental (including specialist input) and technical perspectives is provided in **Section 14** below.

9.2 Site Alternatives

No site alternatives are proposed for this Project. Favourable location factors for the PV Site include suitable solar irradiation levels, short distance to grid connection point, flat topography, suitable site access and availability of land. Much of the surrounding properties are either heavily cultivated or highly sensitive, hence the property identified by the Applicant was guided by suitability as well as willingness of the landowner to enter into an agreement.

9.3 Layout / Design Alternatives

The extent of the site allows for the identification of layout/design alternatives to manage impacts to environmental sensitivity. Layout alternative 1 constitutes the initial layout contemplated during the Scoping Phase. Following the specialist studies, changes were made to the Alternative 1 layout to avoid the drainage lines, a dam, high sensitivity ecological areas (such as CBA2), and has been included during the EIA Phase as Alternative 2. The layouts are discussed in **Section 14** below. The preferred layout is identified in **Section 14** below.

9.4 Technology Alternatives

9.4.1 *PV Technology*

Solar PV technology consists of either monofacial or bifacial solar panels mounted on either a fixed-tilt, single-axis tracking, and/or double-axis tracking system. The following is noted in this regard:

A bifacial solar panel receives irradiation on both sides of the panel, which increases the yield, while monofacial solar panels that only receive power on one of its sides (see **Figure 21** below).

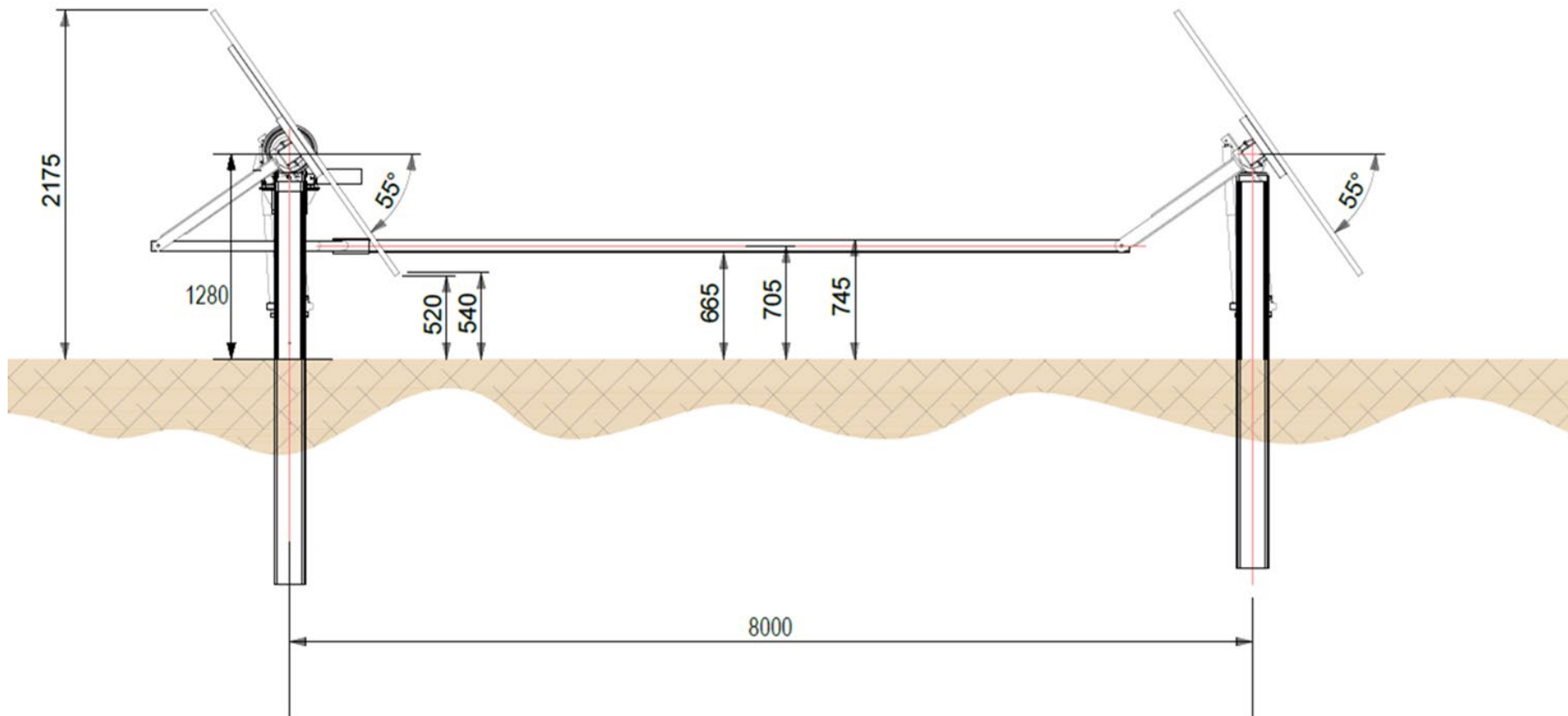
The choice of PV technology will be selected during the final design phase, and as such, is not presented as alternatives in this EIA. It should be noted that the choice of panel technology will not affect any of the impacts or the outcome of the EIA.

A side view of an example of a tracker mounting structure is provided in **Figure 22** below.



Figure 21: Monofacial (top) and bifacial (bottom) solar panels

(<https://www.bluestemenergysolutions.com/bifacial-versus-monofacial-solar-panels-an-analysis/>)



NTS

Figure 22: Side view of proposed tracker mounting structure

9.4.2 *BESS Technology*

The BESS can be broken into solid state and flow battery systems (refer to **Section 9.4** above).

A single battery technology, namely solid state, is anticipated to be implemented for the Project.

9.5 **No-Go Option**

As standard practice and to satisfy regulatory requirements, the option of not proceeding with the Project is included in the assessment of the alternatives.

The “no-go option” is evaluated in **Section 13.26** below to understand the implications of the project not proceeding.

10 PROFILE OF THE RECEIVING ENVIRONMENT

10.1 Introduction

This section provides a general description of the status quo of the receiving environment in the Project Area. This serves to provide the context within which the EIA was conducted. The study area includes the entire footprint of the Project, including the proposed Solar PV Plant and the power line.

Where necessary, the regional context of the environmental features is also explained, with an ensuing focus on the local surrounding environment. The reader is referred to **Section 12** below for more elaborate explanations of the specialist studies and their findings for specific environmental features.

This section allows for an appreciation of sensitive environmental features and possible receptors of the effects of the proposed Project. The potential impacts to the receiving environment are discussed in **Section 13** below.

10.2 Land Use and Land Cover

The Project Area is located approximately 10km west of Rasimone and 30km north-west of Rustenburg's central business district (CBD). The areas affected by the proposed Project footprint are rural in nature. The Project's PV Site is vacant and was historically used for agricultural purposes. Grazing is the dominant land use in the Project area. Views of the Project's PV Site are provided in **Figure 23** below.

The landcover associated with the Project includes natural grasslands, commercial annual rain-fed dry land croplands, and open woodlands (**Figure 24**). The site survey undertaken by the Agricultural specialist (Gouws, 2023) found that there is no cultivated land on the proposed PV site, and the site is used for cattle farming.



Figure 23: South eastern view of PV Site

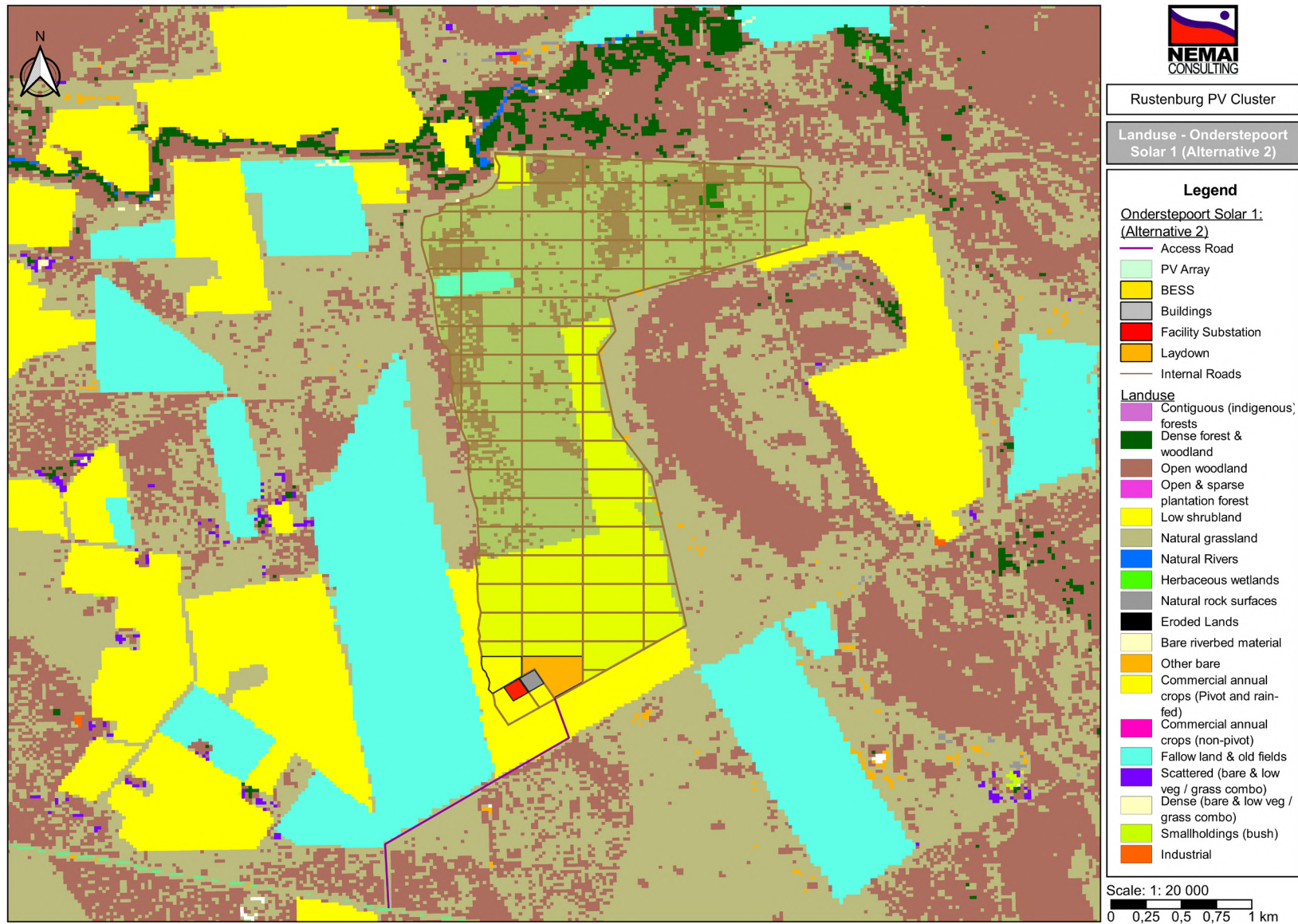


Figure 24: Land cover

10.3 Climate

Rustenburg's climate is a local steppe climate. In Rustenburg, there is little rainfall throughout the year. The Köppen-Geiger climate classification is BSh. The average annual temperature is 18.9 °C in Rustenburg. The rainfall for the year is 602 mm.

The mean minimum and maximum temperatures over the year are shown in **Figure 25** below. The temperature averages 18.6 °C. November and December are the warmest month of the year. The maximum average temperature in November and December is 28.7 °C. The lowest average temperatures in the year occur in July, when it is around 4.9 °C.

	January	February	March	April	May	June	July	August	September	October	November	December
Avg. Temperature °C (°F)	23 °C (73.4) °F	22.8 °C (73.1) °F	21.3 °C (70.4) °F	18.3 °C (64.9) °F	15.1 °C (59.2) °F	12.2 °C (54) °F	12 °C (53.6) °F	15.5 °C (59.8) °F	19.4 °C (66.9) °F	21.7 °C (71.1) °F	22.3 °C (72.1) °F	22.8 °C (73) °F
Min. Temperature °C (°F)	17.8 °C (64) °F	17.6 °C (63.7) °F	16.1 °C (61) °F	12.8 °C (55) °F	8.6 °C (47.5) °F	5.6 °C (42) °F	4.9 °C (40.8) °F	8 °C (46.4) °F	11.8 °C (53.2) °F	14.6 °C (58.3) °F	15.9 °C (60.7) °F	17.4 °C (63.2) °F
Max. Temperature °C (°F)	28.3 °C (82.9) °F	28.1 °C (82.6) °F	26.8 °C (80.2) °F	24 °C (75.2) °F	21.8 °C (71.2) °F	19.2 °C (66.6) °F	19.3 °C (66.7) °F	22.9 °C (73.2) °F	26.9 °C (80.5) °F	28.7 °C (83.6) °F	28.7 °C (83.6) °F	28.3 °C (83) °F
Precipitation / Rainfall mm (in)	99 (3)	96 (3)	76 (2)	37 (1)	18 (0)	7 (0)	3 (0)	7 (0)	15 (0)	51 (2)	76 (2)	117 (4)
Humidity(%)	60%	57%	58%	58%	50%	48%	42%	35%	31%	38%	47%	58%
Rainy days (d)	11	9	8	5	2	1	1	1	2	5	8	11
avg. Sun hours (hours)	9.8	9.7	9.2	8.6	9.0	8.9	9.1	9.6	9.9	10.1	10.1	10.1

Figure 25: Average minimum and maximum temperatures in Rustenburg (Data: 1991 – 2021)
(Copyright © 2022 www. climate-data.org)

The greatest amount of precipitation occurs in December, with an approximate average of 119 mm as shown in Figure 26 below.

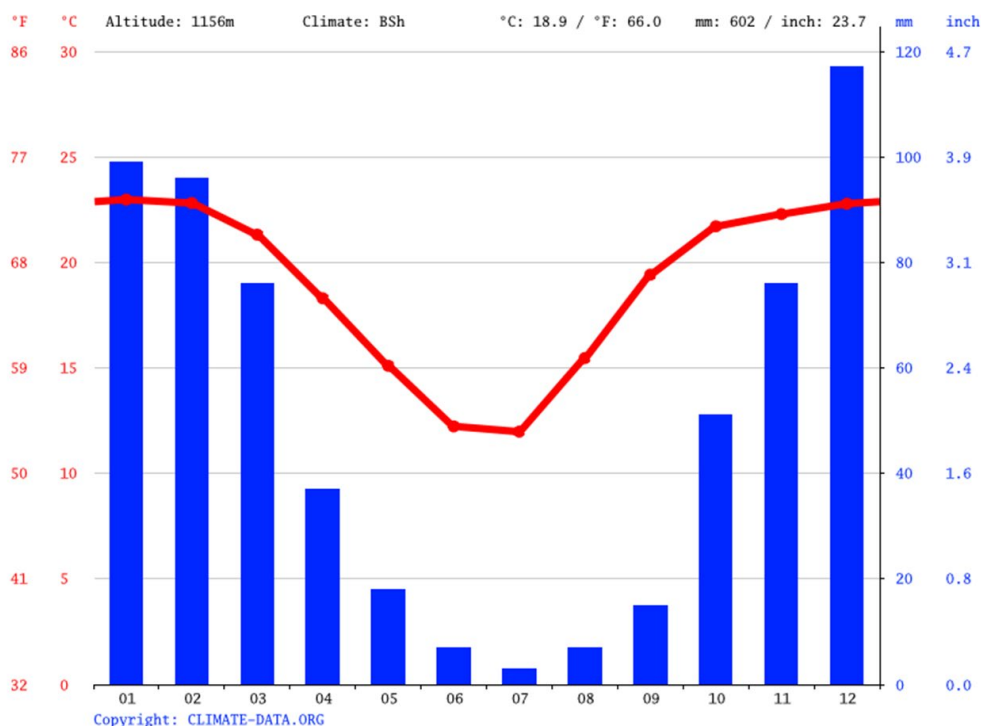


Figure 26: Average precipitation for the year
(Copyright © 2022 www. climate-data.org)

10.4 Geology and Soil

The Project Area consists predominately of quartzites, conglomerates and some shale horizons of the Magaliesburg, Daspoort and Silverton Formations, as shown in **Figure 27** below.

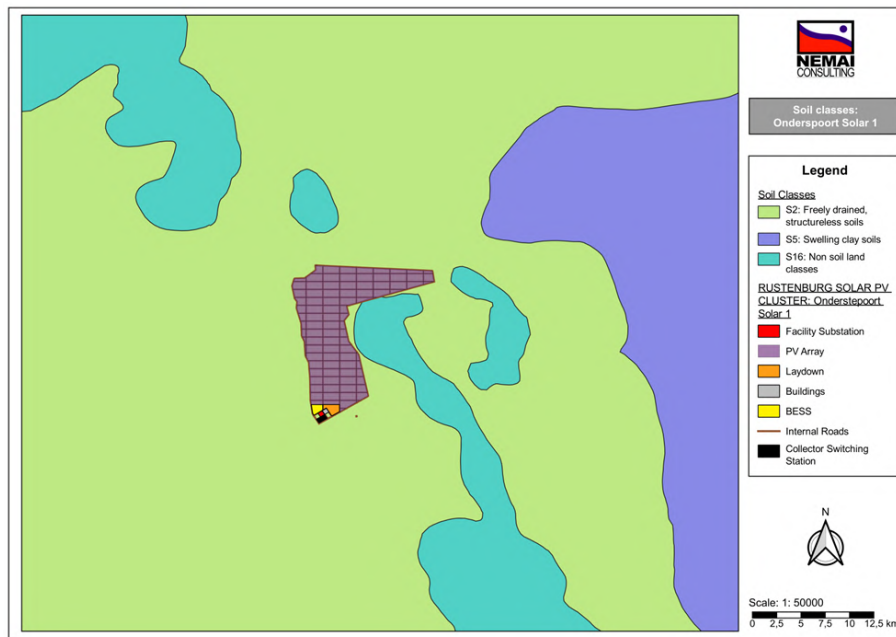


Figure 27: Soil description

The following is noted in the Agricultural Impact Assessment (Gouws, 2023) in terms of the properties of the soil encountered at the site:

- The PV site is located on sedimentary rock in the west and shale for the eastern portion. Both these rocks gave rise to deep moderately structures reddish soils with a medium clay content.
- Soil types identified are Shortlands and Hutton with shallower Glenrosa in the western portion and Mayo along the watercourse.
- In general, because of the low variable rainfall, the land is not arable and only suitable for grazing.

10.5 Hydrogeology

Ground water resources of the RLM can be divided into two aquifer types i.e. Rustenburg Layered Suite to the north of the Magaliesberg and Magaliesburg Formation to the south. Generally, the ground water yield is poor due to various reasons including clay soils with low permeability (RLM IDP, 2027).

10.6 Topography

In terms of the SOTER database (see **Figure 28** below), the landform encountered at most of the PV Site is characterised as a plain at low to medium level.

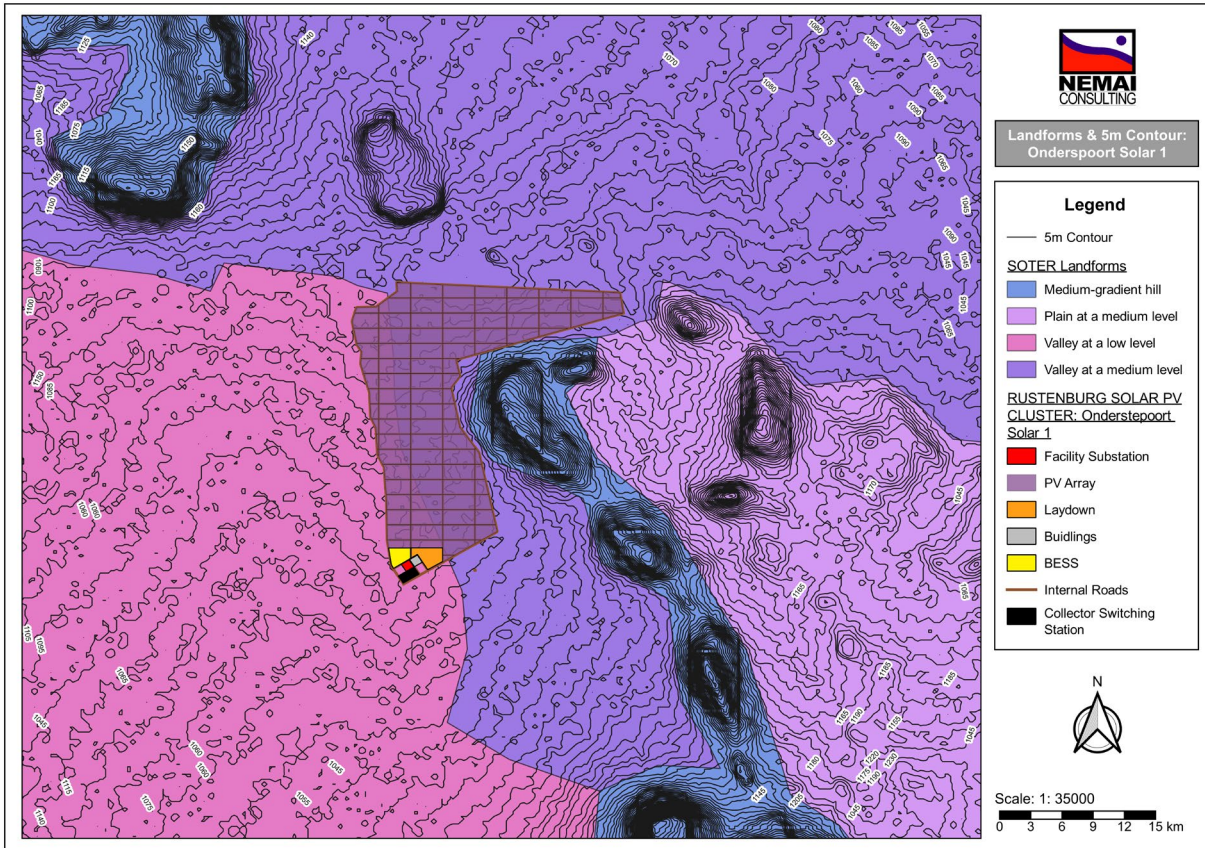


Figure 28: SOTER Landforms

The main topographical feature on the site are drainage lines that flows across the property. This drainage line was delineated as part of the Aquatic Impact Assessment.

According to the findings from the National Web Based Environmental Screening Tool, areas of medium sensitivity in terms of the relative landscape (solar) theme occur at the PV Site (see **Figure 29** below).

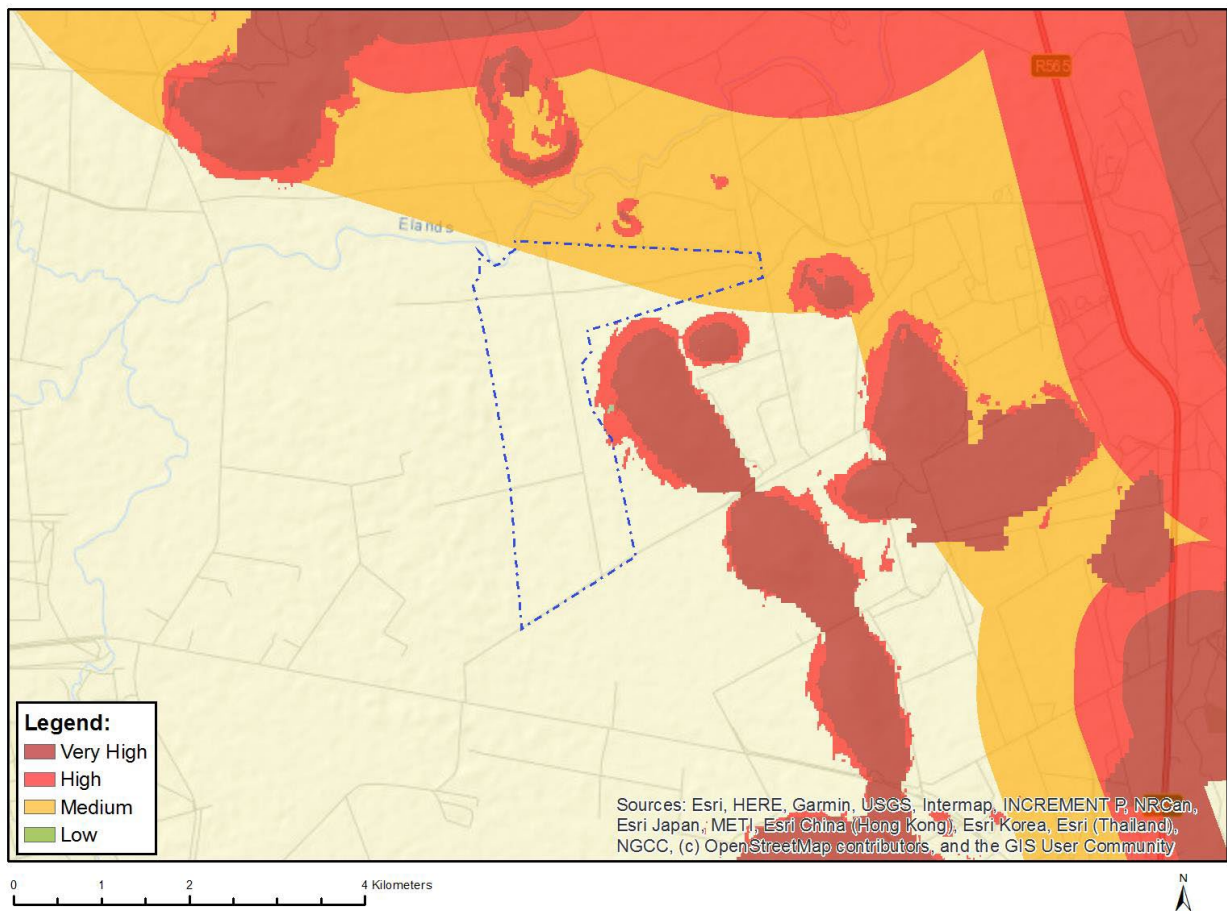


Figure 29: Map of relative landscape (solar) theme sensitivity

The findings of the Visual Impact Assessment that was undertaken for the Project are contained in **Section 12.10** below.

10.7 Surface Water

The information contained in the sub-sections to follow was extracted from the Wetland Delineation and Risk Assessment (van Rooyen, 2023). Refer to **Sections 12.4** and **13.12.2** below for a synopsis of the study and related impact assessment, respectively. The specialist report is contained in **Appendix E1**.

10.7.1 Quaternary Catchments and Water Management Areas

The Project Area is situated in the Limpopo Water Management Area and within the A22F Quaternary Catchment.

10.7.2 National Freshwater Ecosystem Priority Area Status

To better conserve aquatic ecosystems, SA has categorised its river and wetland systems according to set ecological criteria to identify Freshwater Ecosystem Priority Areas (FEPAs). The FEPAs are intended to be conservation support tools and envisioned to guide the effective implementation of measures to achieve the NEM:BA biodiversity goals (Nel *et al.*, 2011).

Figure 30 below shows the location of the Project Area is not situated within any river FEPA catchments (areas that achieve biodiversity targets for river ecosystems and fish species).

10.7.3 National Wetland Map 5

The National Wetland Map 5 spatial data was published in October 2019 (van Deventer *et al.*, 2018) in collaboration with the South African National Biodiversity Institute (SANBI) with the specific aim of spatially representing the location, type and extent of wetlands in SA. The data represents a synthesis of a wide number of official watercourse data including rivers, inland wetlands and estuaries. Within the footprint of the study area, there is one HGM unit according to the NBA 2018 NWM 5 spatial data: a S wetland. There are also S, CVB's and a Dep in close proximity to the study area footprint.

10.7.4 Strategic Water Source Areas (SWSA's)

Strategic Water Source Areas (SWSA) are either (a) areas that supply an uneven (large quantity) amount of mean annual surface water runoff in relation to their size and are therefore considered to be nationally important or (b) have high groundwater recharge and where the groundwater forms nationally important resource or (c) areas that meet both criteria (a) and (b) (Nel *et al.*, 2013; Le Maitre *et al.*, 2018). Areas that supply these disproportionate amounts of water can be because of climatic conditions such as high rainfall, or physical properties (ability of the soils and underlying weathered material and rocks to store water as groundwater) (Le Maitre *et al.*, 2018). In South Africa, 22 SWSA surface water and 37 SWSA groundwater areas has been identified to be strategically important at national level for water and economic security (Le Maitre *et al.*, 2018). The study area is not situated within any of South Africa's three SWSA's.

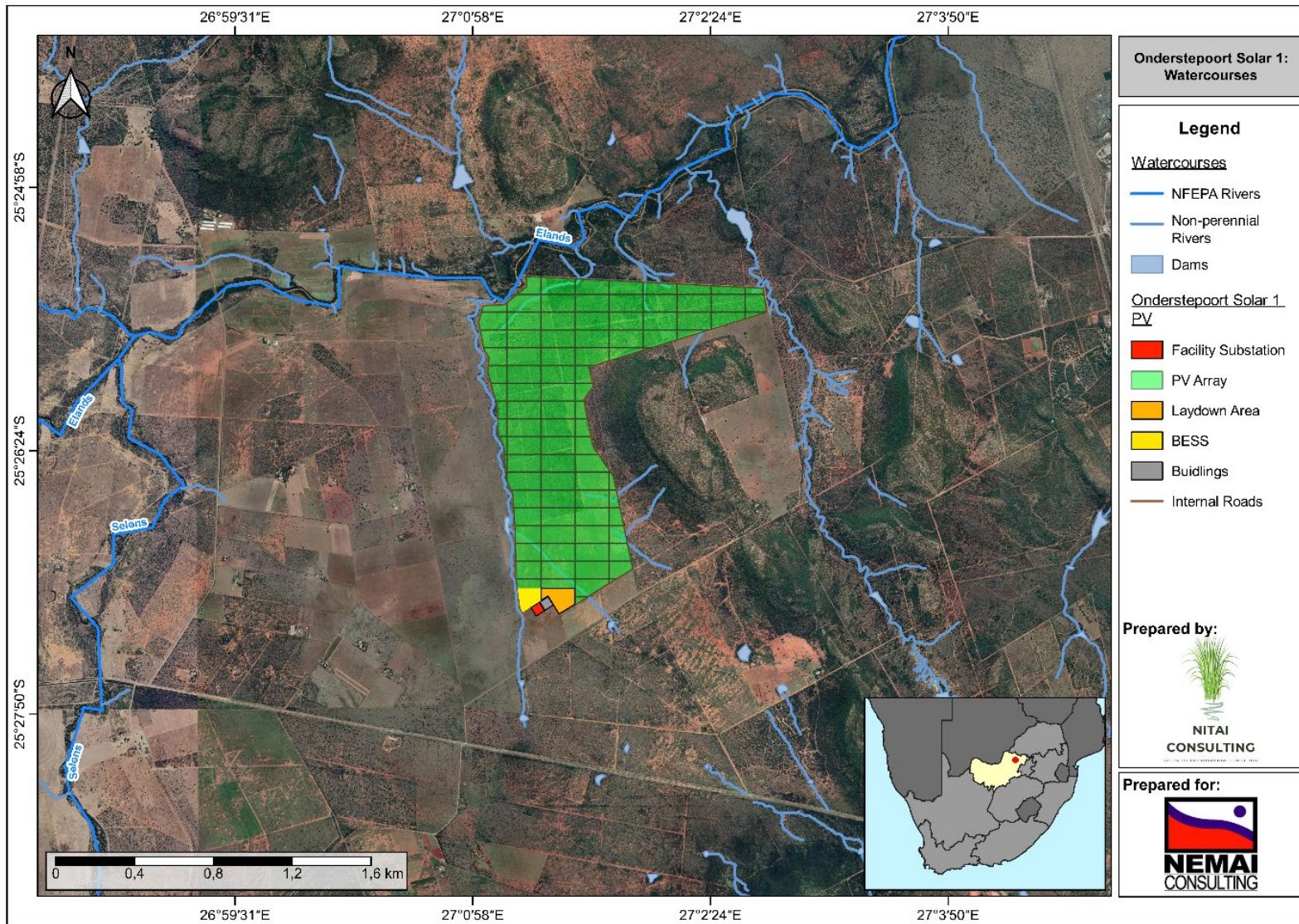


Figure 30: NFEPA Rivers and Wetlands and NWM 5 in relation to Project Area (van Rooyen, 2023)

10.8 Terrestrial Ecology

The information contained in the sub-sections to follow was extracted from the Terrestrial Biodiversity Compliance Statement (Human, 2023). Refer to **Sections 12.5** and **13.13** below for a synopsis of the study and related impact assessment, respectively. The specialist report is contained in **Appendix E2**.

10.8.1 *Ecosystem Threat Status*

The Ecosystem Threat Status is an indicator of an ecosystem's wellbeing, based on the level of change in structure, function or composition. Ecosystem types are categorised as Critically Endangered (CR), Endangered (EN), Vulnerable (VU), Near Threatened (NT) or Least Concern (LC). According to the spatial dataset, the proposed Project Area forms part of an endemic habitat system in the north eastern parts, but the western section is likely not endemic (see **Figure 31** below) but the main development is on an area of least concern in terms of conservation status, (SANBI & DFFE, 2021). (see **Figure 32** below).

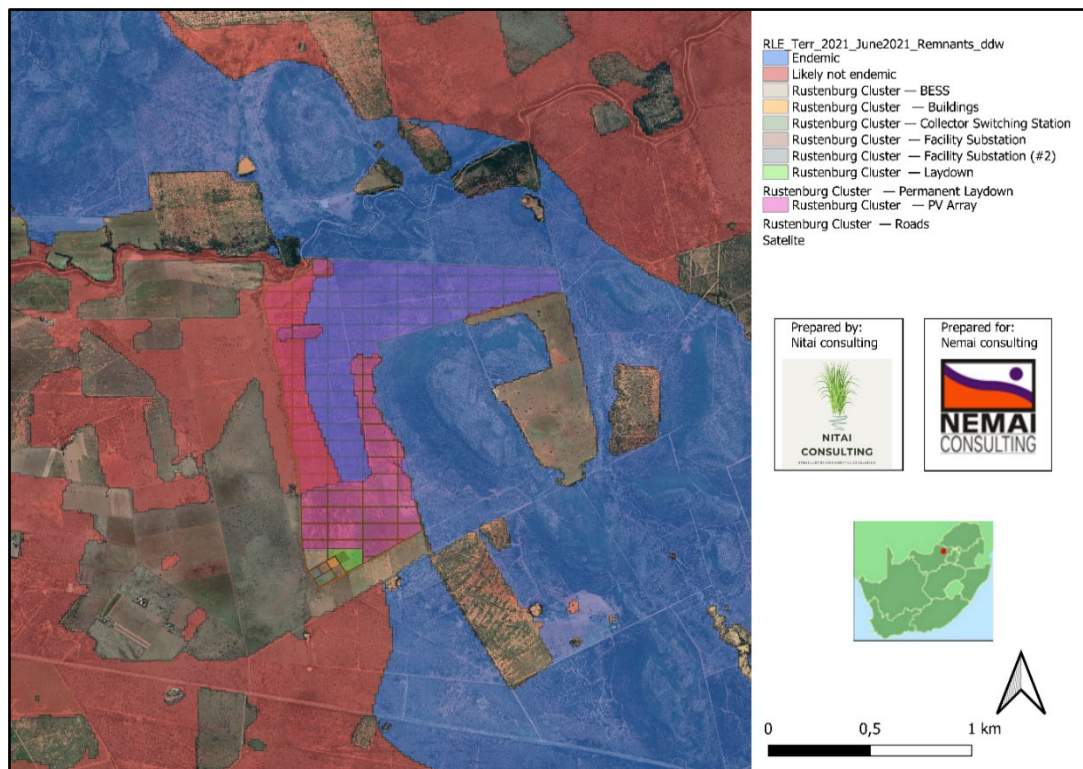


Figure 31: Study site falls within Endemic classification (Human, 2023)

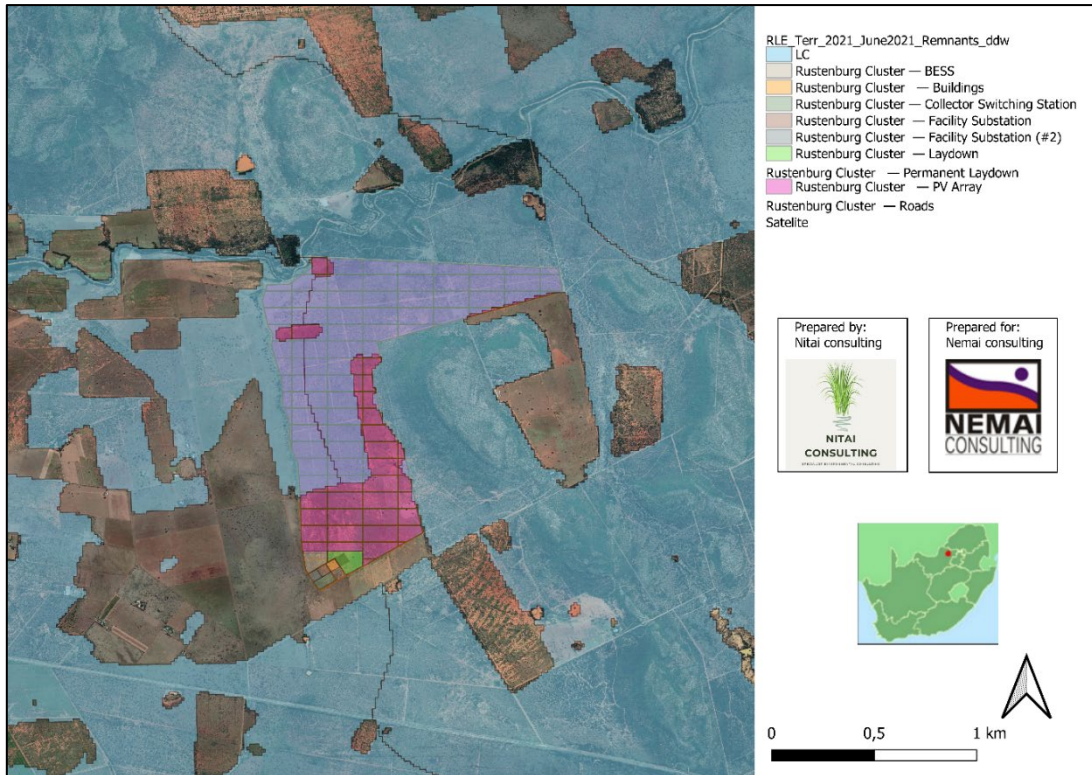


Figure 32: Ecosystem threat status associated with the Project Area (Human, 2023)

10.8.2 Protected Areas

According to the South Africa Protected Areas Database (SAPAD) (2022) and the South Africa Conservation Areas Database (SACAD) (2022), the main project area lies inside the 5 km buffer South from Pilanesberg National Park and is thus on the edge of the 5 km Protected Area Buffer Zone of this Nature reserve (see **Figure 33** below).

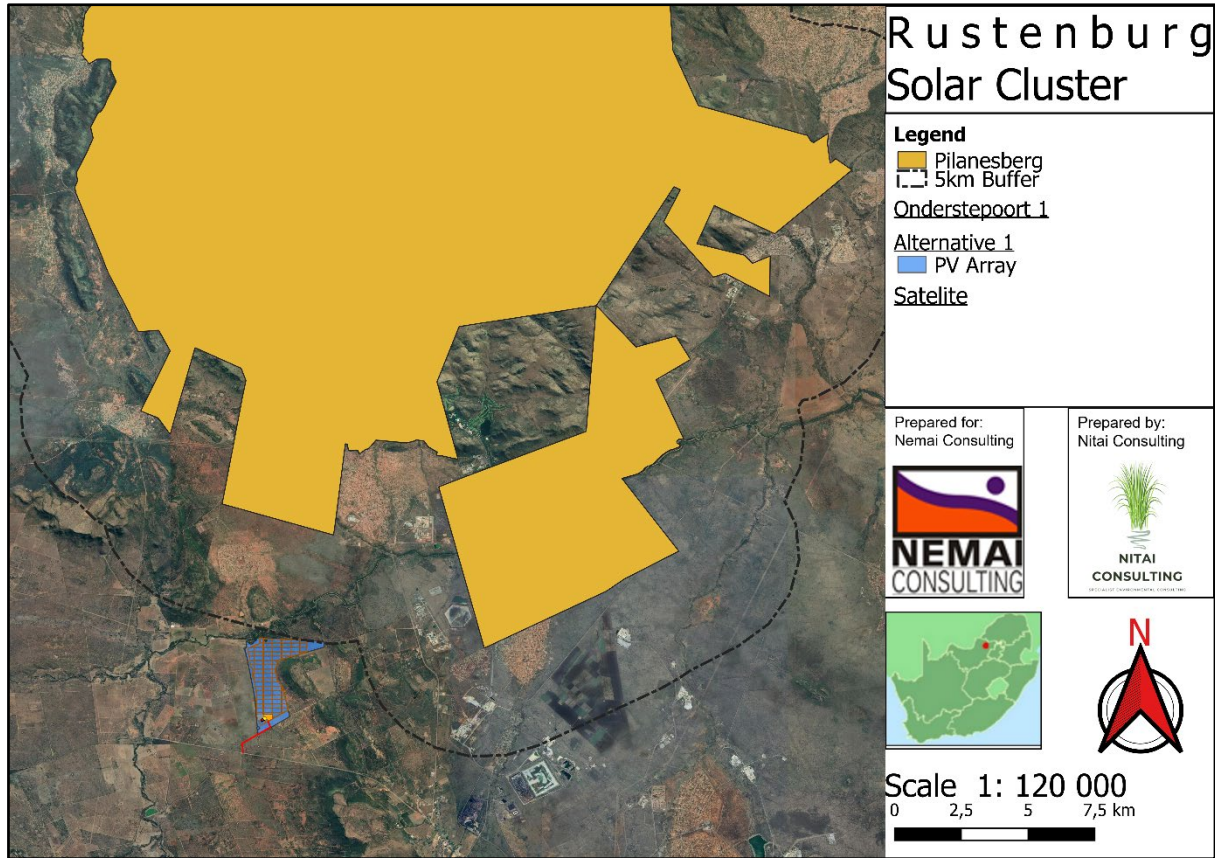


Figure 33: Project Area in relation to the nearest protected areas (Human, 2023)

10.8.3 Critical Biodiversity Areas and Ecological Support Areas

The key output of a systematic biodiversity plan is a map of biodiversity priority areas. The CBA map delineates CBAs, ESAs, ONAs, Protected Areas, and areas that have been irreversibly modified from their natural state.

Figure 34 below shows the Project Area superimposed on the Terrestrial CBA map. The project area overlaps an ESA1, and ESA 2 areas.

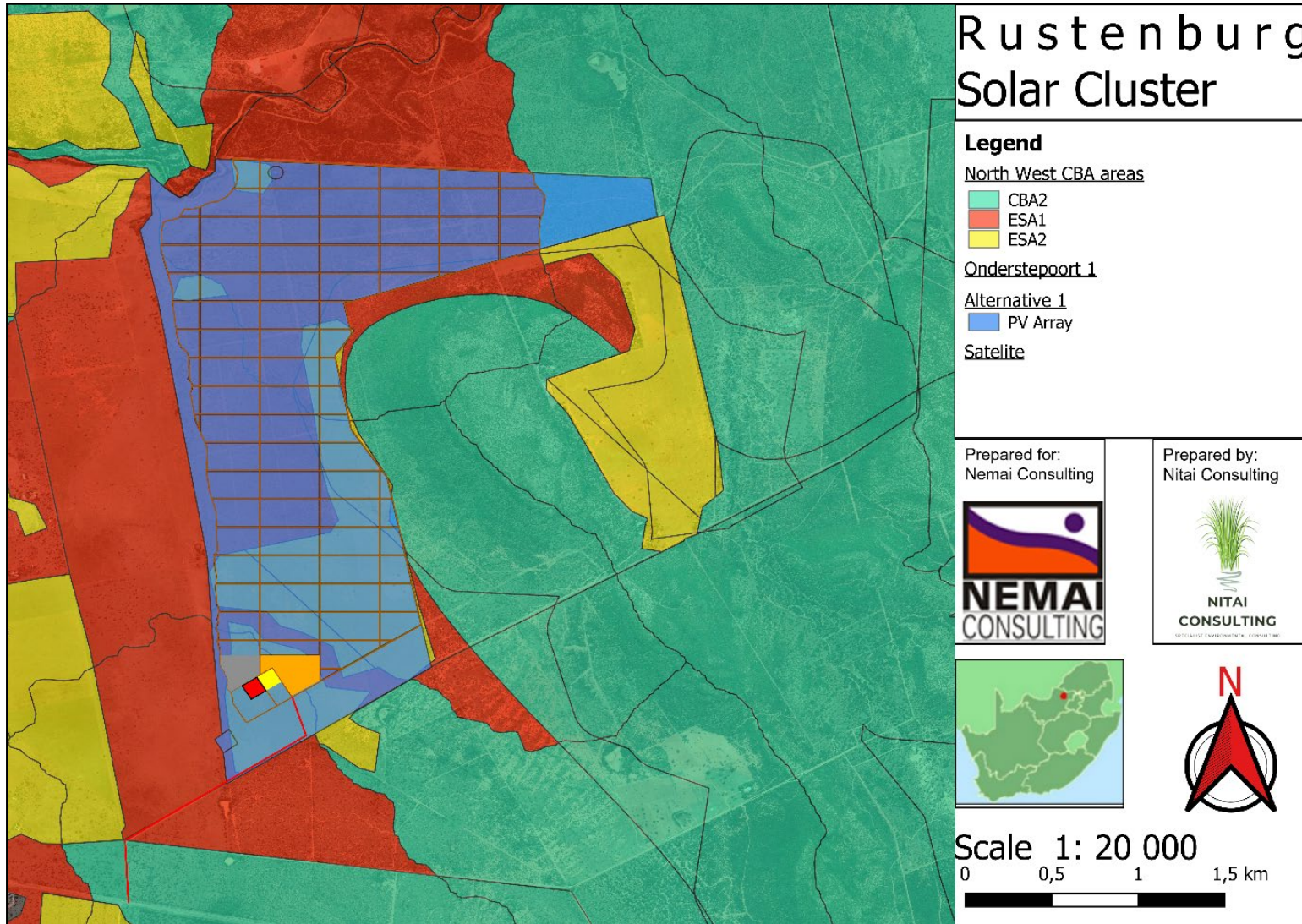


Figure 34: Project Area in relation to CBAs (Human, 2023)

10.8.4 *National Protected Area Expansion Strategy*

The National Protected Area Expansion Strategy 2017 (NPAES) presents the best opportunities for meeting the ecosystem-specific protected area targets and were designed with strong emphasis on climate change resilience and requirements for protecting freshwater ecosystems. The project area does overlap with the Priority Focus Areas, as per the NPAES (see **Figure 35** below).

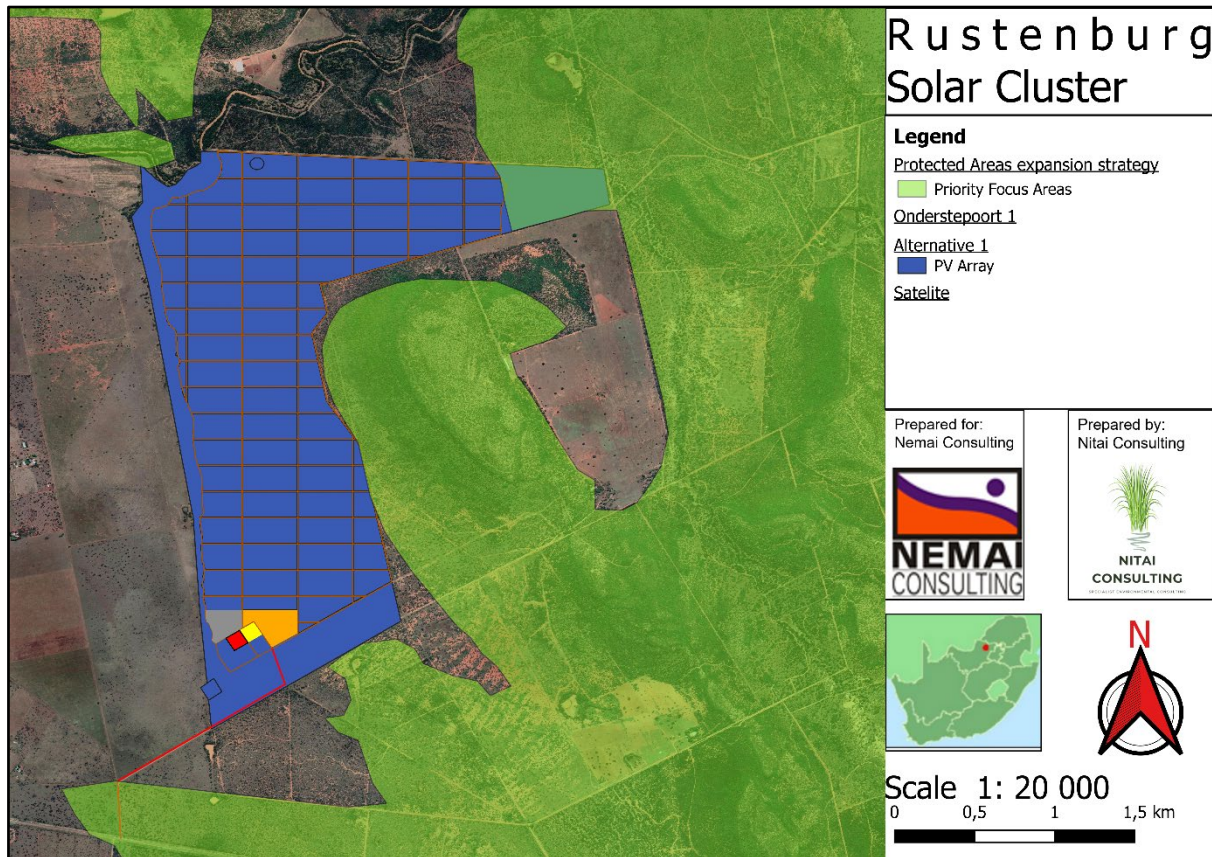


Figure 35: Project Area in relation to NPAES (Human, 2023)

10.8.5 *Flora Assessment*

This section is divided into a description of the vegetation type expected under natural conditions and the expected flora species in the Project Area.

10.8.5.1 Vegetation Type

The Project Area is situated within the Savannah biome. The Savanna Biome contains six bioregions. The Central Bushveld Bioregion has the highest number of vegetation types and covers most of the high-lying plateau west of the main escarpment from the Magaliesberg in the south to the Soutpansberg in the north. The study area is found in the Zeerust Thornveld vegetation bioregion as well as the Gold Reef Mountain Bushveld bioregion (see **Figure 36** below).

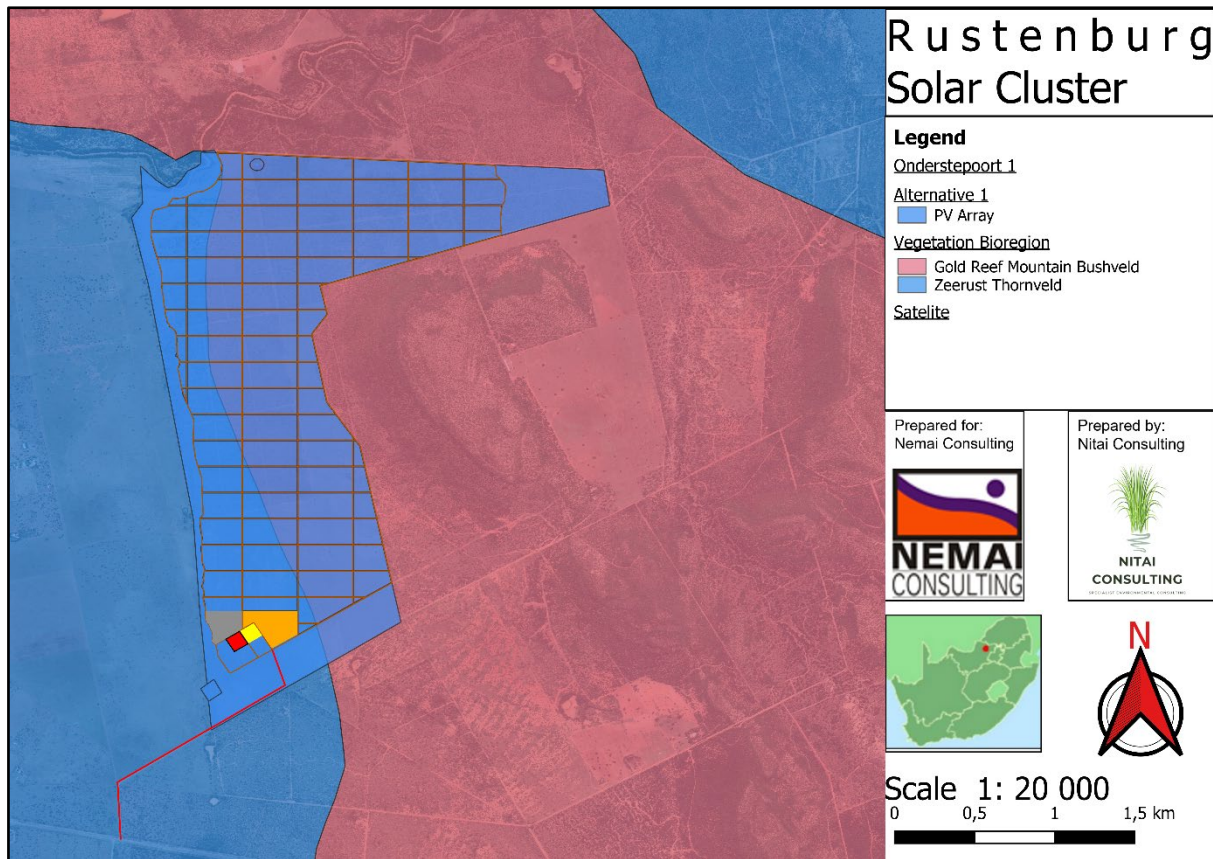


Figure 36: Vegetation type associated with the Project Area (Human, 2023)

Zeerust Thornveld

Deciduous, open to dense short thorny woodland, dominated by *Vachelia* species with herbaceous layer of mainly grasses on deep, high base-status and some clay soils on plains and lowlands, also between rocky ridges of SVcb 4 Dwarsberg-Swartruggens Mountain Bushveld.

Important Taxa (d = dominant):

- Tall Trees: *Senegalia burkei* (d), *Vachelia erioloba* (d). Small Trees: *Senegalia mellifera* subsp. *detinens* (d), *Vachelia nilotica* (d), *Vachelia tortilis* subsp. *heteracantha* (d), *Rhus lancea* (d), *Vachelia fleckii*, *Peltophorum africanum*, *Terminalia sericea*.
- Tall Shrubs: *Diospyros lycioides* subsp. *lycioides*, *Grewia flava*, *Mystroxydon aethiopicum* subsp. *burkeanum*.
- Low Shrubs: *Agathisanthemum bojeri*, *Chaetacanthus costatus*, *Clerodendrum ternatum*, *Indigofera filipes*, *Rhus grandidens*, *Sida chrysantha*, *Stylosanthes fruticosa*. Graminoids: *Eragrostis lehmanniana* (d), *Panicum maximum* (d), *Aristida congesta*, *Cymbopogon pospischilii*.
- Herbs: *Blepharis integrifolia*, *Chamaecrista absus*, *C. mimosoides*, *Cleome maculata*, *Dicoma anomala*, *Kyphocarpa angustifolia*, *Limeum viscosum*, *Lophiocarpus tenuissimus*. Endemic Taxon Low Shrub: *Rhus maricoana*.

Gold Reef Mountain Bushveld

Rocky hills and ridges often west-east trending with more dense woody vegetation often on the south-facing slopes associated with distinct floristic differences (e.g., preponderance of *Vachelia*

caffra on the southern slopes). Tree cover elsewhere is variable. Tree and shrub layers are often continuous. Herbaceous layer is dominated by grasses.

Important Taxa (d = dominant):

- **Small Trees:** *Vachelia caffra* (d), *Combretum molle* (d), *Protea caffra* (d), *Celtis africana*, *Dombeya rotundifolia*, *Englerophytum magalismontanum*, *Ochna pretoriensis*, *Rhus leptodictya*, *Vangueria infausta*, *V. parvifolia*, *Ziziphus mucronata*.
- **Tall Shrubs:** *Canthium gilfillanii*, *Ehretia rigida* subsp. *rigida*, *Grewia occidentalis*, *Gymnosporia buxifolia*, *Myroxylon aethiopicum* subsp. *burkeanum*.
- **Low Shrubs:** *Athrixia elata*, *Pearsonia cajanifolia*, *Rhus magalismontana* subsp. *magalismontana*, *R. rigida* var. *rigida*.
- **Woody Climber:** *Ancylobotrys capensis*.
- **Graminoids:** *Loudetia simplex* (d), *Panicum natalense* (d), *Schizachyrium sanguineum* (d), *Trachypogon spicatus* (d), *Alloteropsis semialata* subsp. *eckloniana*, *Bewsia biflora*, *Digitaria tricholaenoides*, *Diheteropogon amplexans*, *Sporobolus pectinatus*, *Tristachya biseriata*, *T. leucothrix*.
- **Herbs:** *Helichrysum nudifolium*, *H. rugulosum*, *Pentanisia angustifolia*, *Senecio venosus*, *Xerophyta retinervis*.
- **Geophytic Herbs:** *Cheilanthes hirta*, *Hypoxis hemerocallidea*, *Pellaea calomelanos*.
- **Endemic Taxa Succulent Shrub:** *Aloe peglerae*.
- **Succulent Herb:** *Frithia pulchra*.

10.8.5.2 Expected Flora Species

Plants of Southern Africa (POSA) database was accessed to compile a list of expected flora species within the project area. Only one Species of Conservation Concern (SCC) i.e the *Cullen hollubi*, based on its conservation status could be expected to occur within the project area. However, this species is unlikely to occur in the project area.

10.8.5.3 Field Survey

The vegetation assessment was conducted throughout the extent of the project area. A total of 76 tree, shrub, herbaceous and graminoid plant species were recorded in the project area during the field assessment. The list of plant species recorded is by no means comprehensive, and repeated surveys during different phenological periods not covered, may likely yield up to 30% additional flora species for the project area. However, floristic analysis conducted to date is however regarded as a sound representation of the local flora for the project Area.

10.8.6 Faunal Assessment

10.8.6.1 Amphibians

Based on the IUCN Red List Spatial Data and AmphibianMap, fourteen amphibian species are expected to occur within the area. None are regarded as threatened.

10.8.6.2 Reptiles

One reptile species was recorded in the project area during survey period, namely *Pelomedusa subrufa* (Marsh terrapin). However, there is the possibility of several species being present, as

certain reptile species are secretive and longer-term surveys are required to ensure adequate sampling. No amphibian species were recorded during the survey period. However, due to the presence of various wetlands across the project area providing suitable habitat there is a possibility of more amphibian species being present. None of the herpetofauna species recorded are regarded as threatened.

10.8.6.3 Mammals

Nine mammal species were observed during this survey of the project area (see **Table 11**) based on either direct observation or the presence of visual tracks and signs. None of the species recorded are regarded as a SCC. Five mammal species are provincially protected.

Table 11: Summary of mammal species recorded within the project area (Human, 2023)

Family	Taxon	Common name	Status	North West Biodiversity Management Act
Bovidae	<i>Aepyceros melampus</i>	Impala	Least Concern	Schedule 3
Bovidae	<i>Damaliscus pygargus phillipsi</i>	Blesbok	Least Concern (2016)	Schedule 2
Bovidae	<i>Kobus ellipsiprymnus</i>	Waterbuck	Least Concern (2016)	Schedule 2
Bovidae	<i>Syncerus caffer</i>	African Buffalo	Least Concern (2008)	Schedule 2
Bovidae	<i>Taurotragus oryx</i>	Common Eland	Least Concern (2016)	Schedule 2
Bovidae	<i>Tragelaphus angasii</i>	Nyala	Least Concern (2016)	Schedule 3
Bovidae	<i>Tragelaphus strepsiceros</i>	Greater Kudu	Least Concern (2016)	Schedule 3
Suidae	<i>Phacochoerus africanus</i>	Common Warthog	Least Concern (2016)	Schedule 4
Bovidae	<i>Hippotragus niger</i>	Sable Antelope	Vulnerable (IUCN 2016)	Schedule 2

10.8.6.4 Field Survey

Mammal activity was low, due to the extent of disturbance in general with cattle grazing the area, as well as the poor habitat condition. The species present are most likely not resident due to the modified state of the area. No SCC were observed during the field survey.

10.8.7 Avifaunal Assessment

A separate Avifaunal Baseline and Impact Assessment (Husted, 2023) was undertaken for the Project. The information to follow was extracted from this study. Refer to **Sections 12.6** and **13.14** below for a synopsis of the study and related impact assessment, respectively. The specialist report is contained in **Appendix E3**.

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 (Birdlife South Africa, 2017).

Figure 37 below shows that site does not encroach into any IBAs. There are two IBAs over 10 km from the site, which include the Pilanesberg National Park IBA and the Magaliesberg IBA.

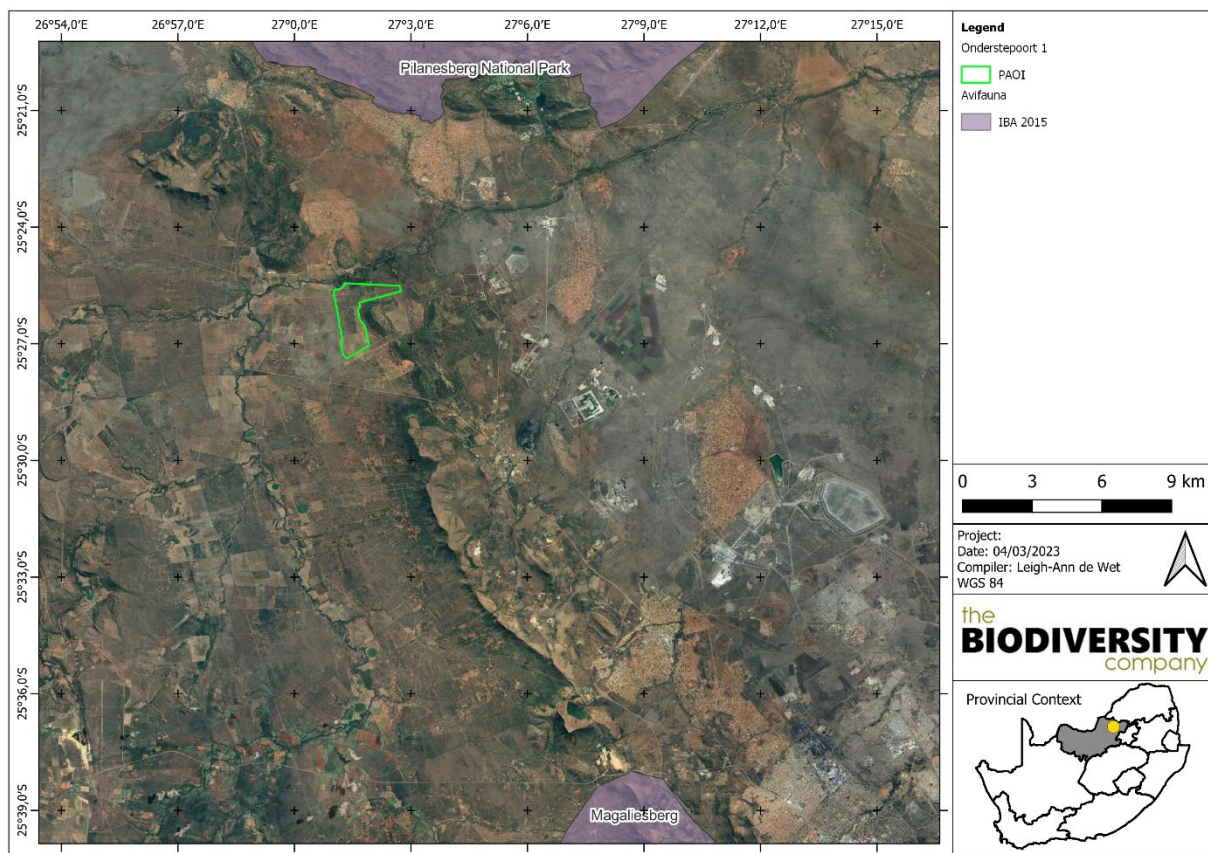


Figure 37: Project Area in relation to the nearest IBA (Husted, 2023)

South African Bird Atlas Project 2 (SABAP2)

The SABAP2 Data lists 394 indigenous avifauna species that could be expected to occur within the PAOI and surrounding landscape. Twenty-one (29) of these expected species are regarded as SCC. These species are described below.

Table 10: Threatened avifauna species that are expected to occur within the project area CR = Critically Endangered, EN = Endangered, LC = Least Concern, NT = Near Threatened and VU = Vulnerable (Husted, 2023)

Scientific Name	Common Name	Red Regional*	List	Red Global+	List	Likelihood of Occurrence
<i>Alcedo semitorquata</i>	Half-collared Kingfisher	NT		LC		Low
<i>Aquila rapax</i>	Tawny Eagle	EN		VU		Moderate
<i>Aquila verreauxii</i>	Verreaux's Eagle	VU		LC		Moderate
<i>Ardeotis kori</i>	Kori Bustard	NT		NT		High
<i>Calidris ferruginea</i>	Curlew Sandpiper	LC		NT		Low
<i>Ciconia abdimii</i>	Abdim's Stork	NT		LC		Moderate
<i>Ciconia nigra</i>	Black Stork	VU		LC		Low
<i>Circus macrourus</i>	Pallid Harrier	NT		NT		Moderate
<i>Circus ranivorus</i>	African Marsh Harrier	EN		LC		Moderate
<i>Coracias garrulus</i>	European Roller	NT		LC		High
<i>Falco biarmicus</i>	Lanner Falcon	VU		LC		High
<i>Glareola nordmanni</i>	Black-winged Pratincole	NT		NT		Moderate
<i>Grus paradisea</i>	Blue Crane	NT		VU		High
<i>Gyps africanus</i>	White-backed Vulture	CR		CR		Moderate
<i>Gyps coprotheres</i>	Cape Vulture	EN		VU		Moderate
<i>Hydroprogne caspia</i>	Caspian Tern	VU		LC		Moderate
<i>Leptoptilos crumenifer</i>	Marabou Stork	NT		LC		Low
<i>Mycteria ibis</i>	Yellow-billed Stork	EN		LC		Low
<i>Pelecanus rufescens</i>	Pink-backed Pelican	VU		LC		Low
<i>Phoeniconaias minor</i>	Lesser Flamingo	NT		NT		Moderate
<i>Phoenicopterus roseus</i>	Greater Flamingo	NT		LC		Moderate
<i>Podica senegalensis</i>	African Finfoot	VU		LC		Low
<i>Polemaetus bellicosus</i>	Martial Eagle	EN		EN		High
<i>Pterocles gutturalis</i>	Yellow-throated Sandgrouse	NT		LC		High
<i>Rostratula benghalensis</i>	Greater Painted-snipe	NT		LC		Low
<i>Sagittarius serpentarius</i>	Secretarybird	VU		EN		High
<i>Terathopius ecaudatus</i>	Bateleur	EN		EN		Moderate
<i>Torgos tracheliotos</i>	Lappet-faced Vulture	EN		EN		Low
<i>Tyto capensis</i>	African Grass Owl	VU		LC		High

*(Taylor *et al.* 2015), + (IUCN 2021)

10.9 Socio-Economic Environment

10.9.1 11.9.1 Municipal Profile

Table 12: Demographic information for the RLM (<https://municipalities.co.za/demographic/1191/rustenburg-local-municipality>)

	Community Survey 2016	Census 2011
Population	626 522	549 575
Age Structure		
Population under 15	28.1%	24.1%
Population 15 to 64	68.9%	72.5%
Population over 65	3.0%	3.4%
Dependency Ratio		
Per 100 (15-64)	45.2	37.9
Sex Ratio		
Males per 100 females	120.9	121.8
Population Growth		
Per annum	2.98%	n/a
Labour Market		
Unemployment rate (official)	n/a	26.4%
Youth unemployment rate (official) 15-34	n/a	34.7%
Education (aged 20 +)		
No schooling	4.7%	5.4%
Matric	34.6%	31.0%
Higher education	7.4%	8.9%
Household Dynamics		
Households	262 576	199 044
Average household size	2.4	2.5
Female headed households	24.3%	26.4%
Formal dwellings	68.1%	68.7%
Housing owned	45.0%	31.4%
Household Services		
Flush toilet connected to sewerage	45.0%	31.4%
Weekly refuse removal	67.1%	69.2%
Piped water inside dwelling	28.5%	35.8%
Electricity for lighting	83.7%	83.0%

The Project Area is located in the Rustenburg Local Municipality (RLM). Demographic information for the RLM is presented in **Table 12** above.

It must be noted that the mining sector is the main driver of Bojanala Platinum's economy and contributes the highest figure of R 71.5 billion (52.1%) of the total GVA in the district municipality's economy, which is more than half of the District's Gross Domestic Product (GDP). The district is also responsible for producing platinum, chrome, diamond, slate, and silica. The bulk of platinum mining activity is located in the Rustenburg Local Municipal area.

According to the Municipal IDP, 2020/21, Rustenburg's economy largely revolves around the production of platinum, which contributed 66% to provincial GVA in 2013, followed by the trade and finance sector which contributed 29% and 28%, respectively, in the same period. The decline in Rustenburg's GDP (-3.5%) in the year 2012 was influenced by the decline in the mining sector, which resulted in a negative growth in the overall province (Municipal IDP,2020/21).

10.10 Agriculture

The entire site is used for cattle and buffalo farming. The veld is in relatively good condition with a large percentage of palatable grass species. There is no cultivated land on the proposed PV site.

Using the same guidelines as in AGIS (DALRRD), the land has low to moderate (Class 7) arable potential.

The findings from the Agricultural Impact Assessment that was undertaken for the Project are contained in **Section 12.7** below.

10.11 Air quality

Potential sources of air pollution in the region include the following:

- Fugitive dust emissions from agricultural activities;
- Vehicle exhaust emissions from vehicles traveling on paved and unpaved roads;
- Biomass burning (veld fires);
- Domestic fuel burning;
- Industrial operations;
- Waste treatment and disposal; and
- Other fugitive dust sources such as wind erosion from exposed areas.

10.12 Noise

In terms of the local acoustical environment, the background noise levels are expected to be typical of a rural area. Noise in the greater area emanates primarily from farming operations (e.g., use of farming equipment), vehicles on the surrounding road network, and human activities in surrounding settlements.

10.13 Cultural Heritage & Palaeontological Features

10.13.1 *Cultural Heritage*

The information to follow was obtained from the Phase 1 Cultural Heritage Impact Assessment (Kitto, 2023) (contained in **Appendix E5**). Refer to **Sections 12.8** and **13.16** below for a synopsis of the study and a related impact assessment, respectively.

An assessment of available historical topographical maps was undertaken to establish a historic layering for the study area. Overlays of the maps were made on Google Earth. These historic maps are valuable resources in identifying possible heritage sites and features located within the study area. It should be noted

that the earliest edition of the map sheets for this area dates to the 1960s. As the first edition of this sheet dates to 1963, it was not considered necessary to examine the later edition map sheets. Any heritage resources that are 60 years or older would be depicted on the 1963 edition sheet. The topographical maps were obtained from the Department of Agriculture, Land Reform and Rural Development (DALRRD) in Cape Town.

The following 1:50 000 map sheet was assessed for the Onderstepoort Solar 1 footprint: 2527AC Heystekrand Edition 1 1963. The map was surveyed in 1963 and drawn in 1964 by the Trigonometrical Survey Office of the Republic of South Africa from aerial photographs taken in 1961.

As can be seen in **Figure 38**, below, the 1963 edition map depicts only one heritage feature just within the Onderstepoort Solar 1 footprint (Alternative 1 and Alternative 2 layouts). This is a homestead with associated walls. A small homestead (one hut) is depicted just outside (south) of the eastern section of the footprint area. As seen in **Figure 39**, below, the later edition sheets (from 1982 onwards) depict no heritage feature/s in that location and no other structures or features within the footprint. During the site survey no stone walling or visible remains were identified in the general vicinity of the homestead walling depicted on the 2527AC topographic map, first edition (1963).

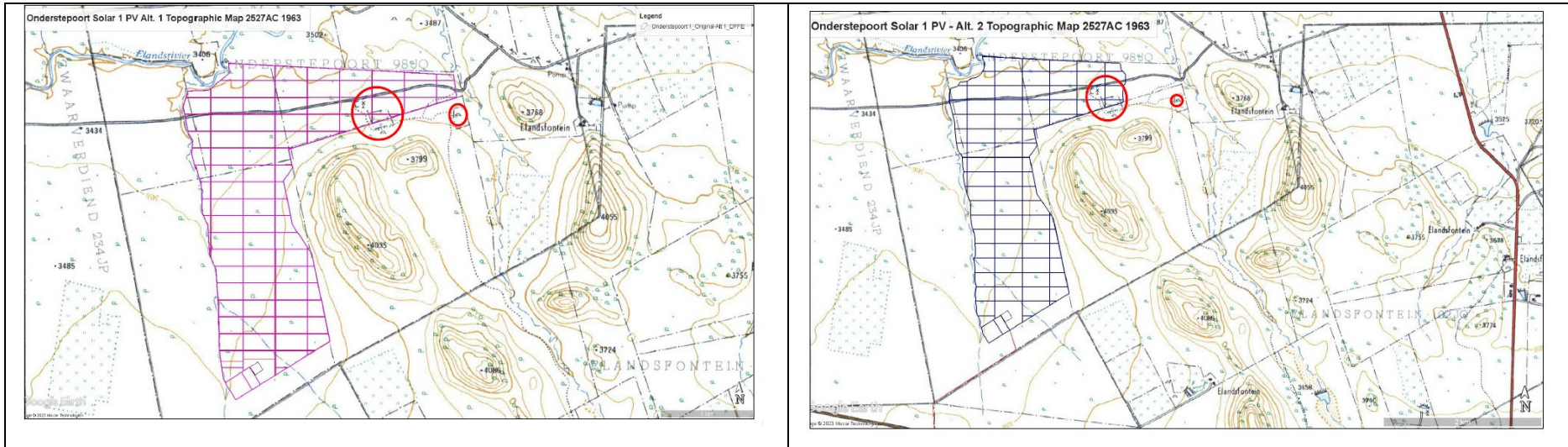


Figure 38: Heritage features identified within the PV Project (Alternative 1 and 2) footprint and surrounds (red polygons) (Kitto, 2023) (1963 edition map depicts)

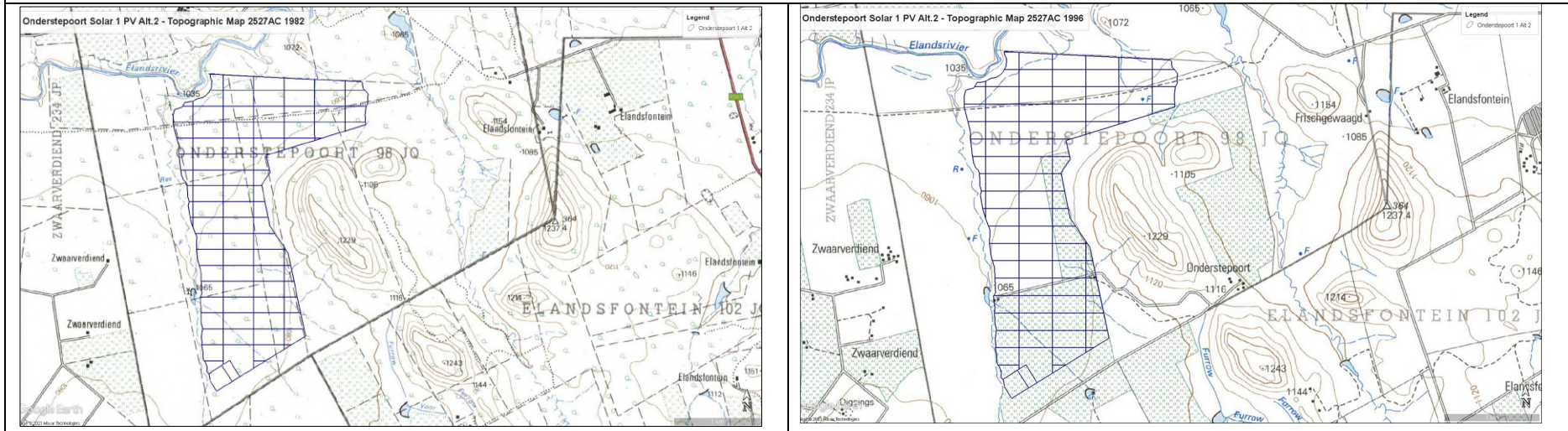


Figure 39: Topographic map 2527AC 1982 & 2527AC 1996, depicting no heritage feature within the footprint- Alternative 2 layout. Both the walled homestead and the small homestead depicted in the Edition 1 sheet are no longer depicted.

10.13.2 Palaeontological Features

The information to follow was obtained from Palaeontological Impact Assessment (Butler, 2023) (contained in **Appendix E6**). Refer to **Sections 12.9** and **13.17** below for a synopsis of the study and a related impact assessment, respectively.

The study area is underlain by undifferentiated Quaternary surface deposits as well as the Silverton Formation (Pretoria Group, Transvaal Supergroup). A very small area in the north is underlain by the Rustenburg layered Suite. The PalaeoMap of the South African Heritage Resources Information System (SAHRIS) indicates that the Palaeontological Sensitivity of Quaternary deposits is Moderate while that of the Silverton Formation is High) and that of the Rustenburg Layered Suite is Zero as it is igneous in origin and thus unfossiliferous. The Palaeontological Sensitivity generated by the National Environmental Web-Based Screening Tool indicates that the development is underlain by the sediments with a High Palaeontological Sensitivity. Updated Geology (Council of Geosciences, Pretoria) of the proposed study area refined the geology and indicates that the development is underlain by alluvium, elluvium, colluvium and gravel, as well as the Silverton and Magaliesberg Formations (Pretoria Group, Transvaal Supergroup) and the Rustenburg Layered Suite. (see **Figure 40** below).

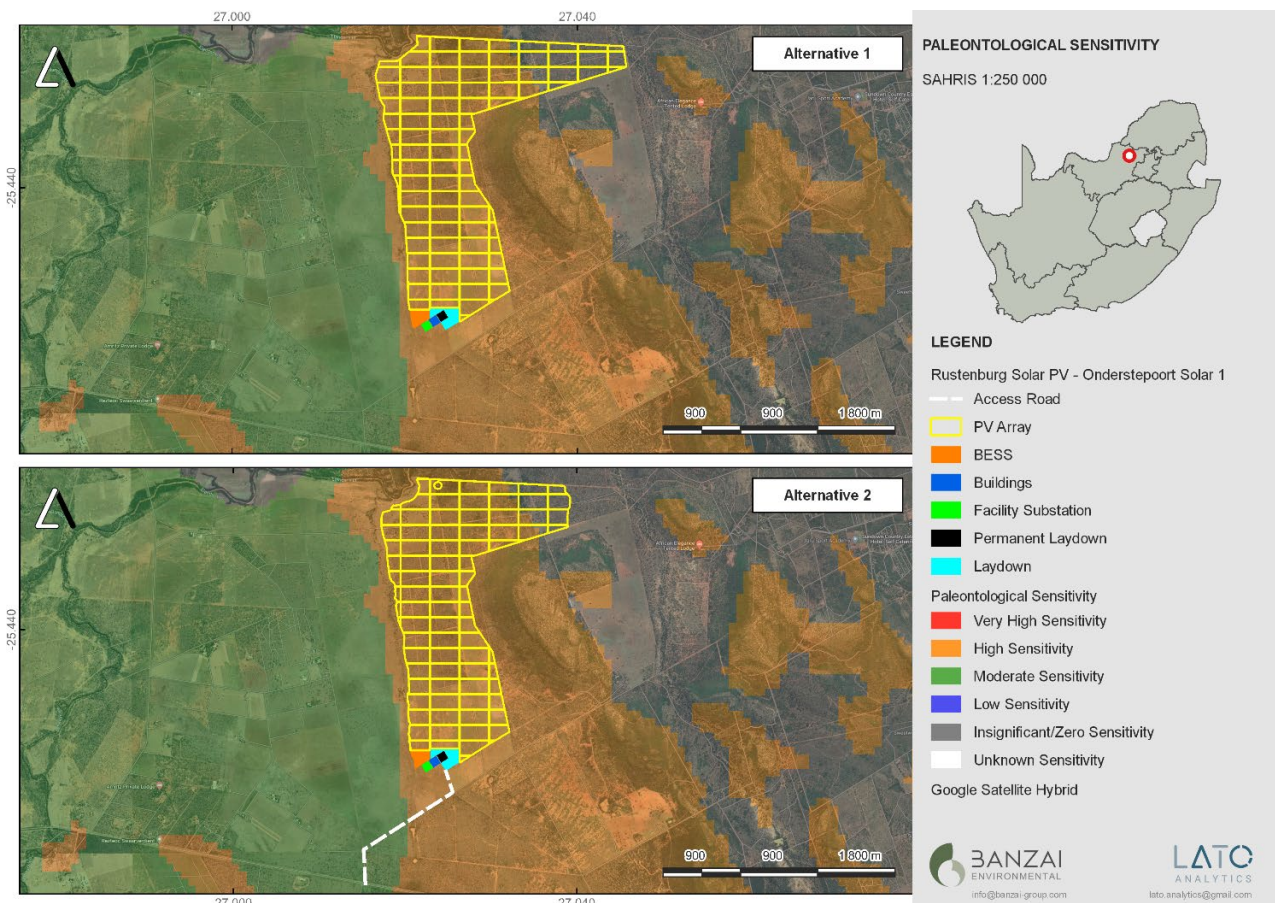


Figure 40: Extract of the 1 in 250 000 SAHRIS PalaeoMap (Council of Geosciences) indicating the proposed Onderstepoort Solar PV 1 Project near Rustenburg, in the North West Province.

The SAHRIS Palaeosensitivity map above indicates that the proposed development is underlain by sediments with a High (orange), Moderate (green) and Zero (grey) Palaeontological Sensitivity. A desktop study was therefore conducted.

The National Environmental Web-based Screening Tool indicates that the Palaeontological Sensitivity of the development is High (red) to Moderate (orange) **Figure 41** below.

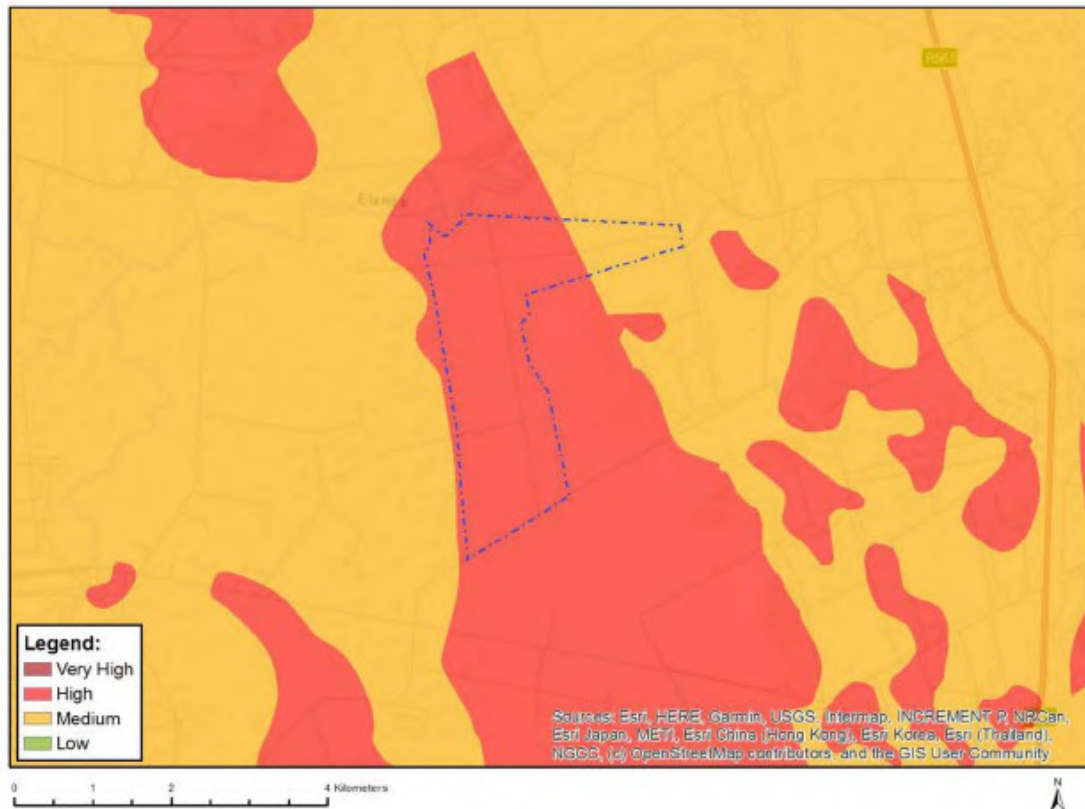


Figure 41: Palaeontological Sensitivity of the Onderstepoort Solar PV 1 facility by the National Environmental Web-based Screening Tool.

10.14 Planning

The following is noted from a planning perspective:

- The proposed PV Site and power line are located outside of the urban edge and should not impact on future urban expansion.
- In the event that the Solar PV Plant must be decommissioned, the decommissioning phase will include measures for complying with the prevailing regulatory requirements, rehabilitation and managing environmental impacts in order to render the affected area suitable for a future desirable use.
- No approved renewable energy applications have been made within a 30km radius of the PV Site, according to DFFE's REEA Database (refer to **Section 6.9** above).

10.15 Existing Structures and Infrastructure

Lindleyspoort Road (off the R565) runs along the southern boundary of the site of the PV Site (see **Figure 42** below)

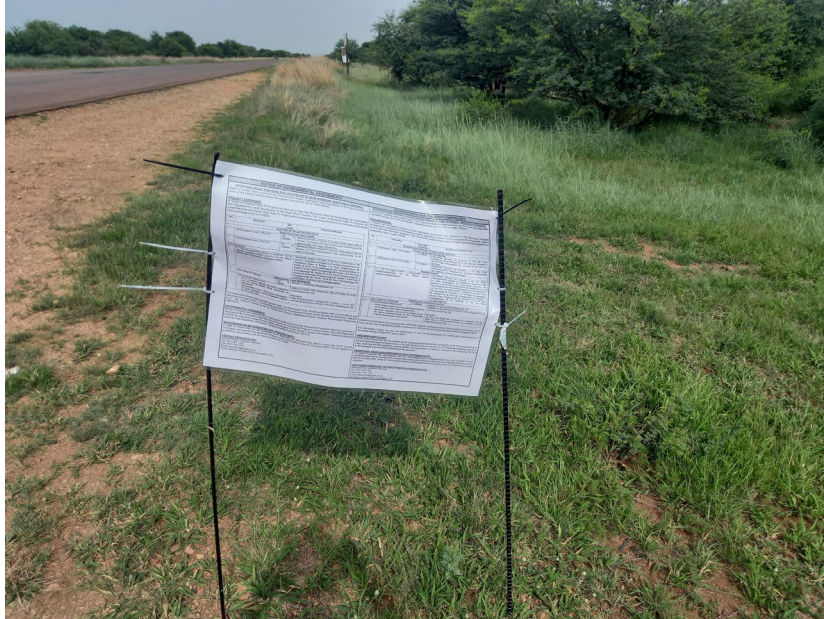


Figure 42: Lindleyspoort Road (off the R565)

The setbacks / conditions required by the custodians of infrastructure on the PV Site and along the power line route will need to be adhered to.

10.16 Transportation

The municipality has a comprehensive road network comprising a number of national, provincial secondary roads, and railway lines. The transportation network in the Project Area is shown in Figure 43 below. The site can be accessed via Lindleyspoort Road (off the R565) which runs along the southern boundary of the site.

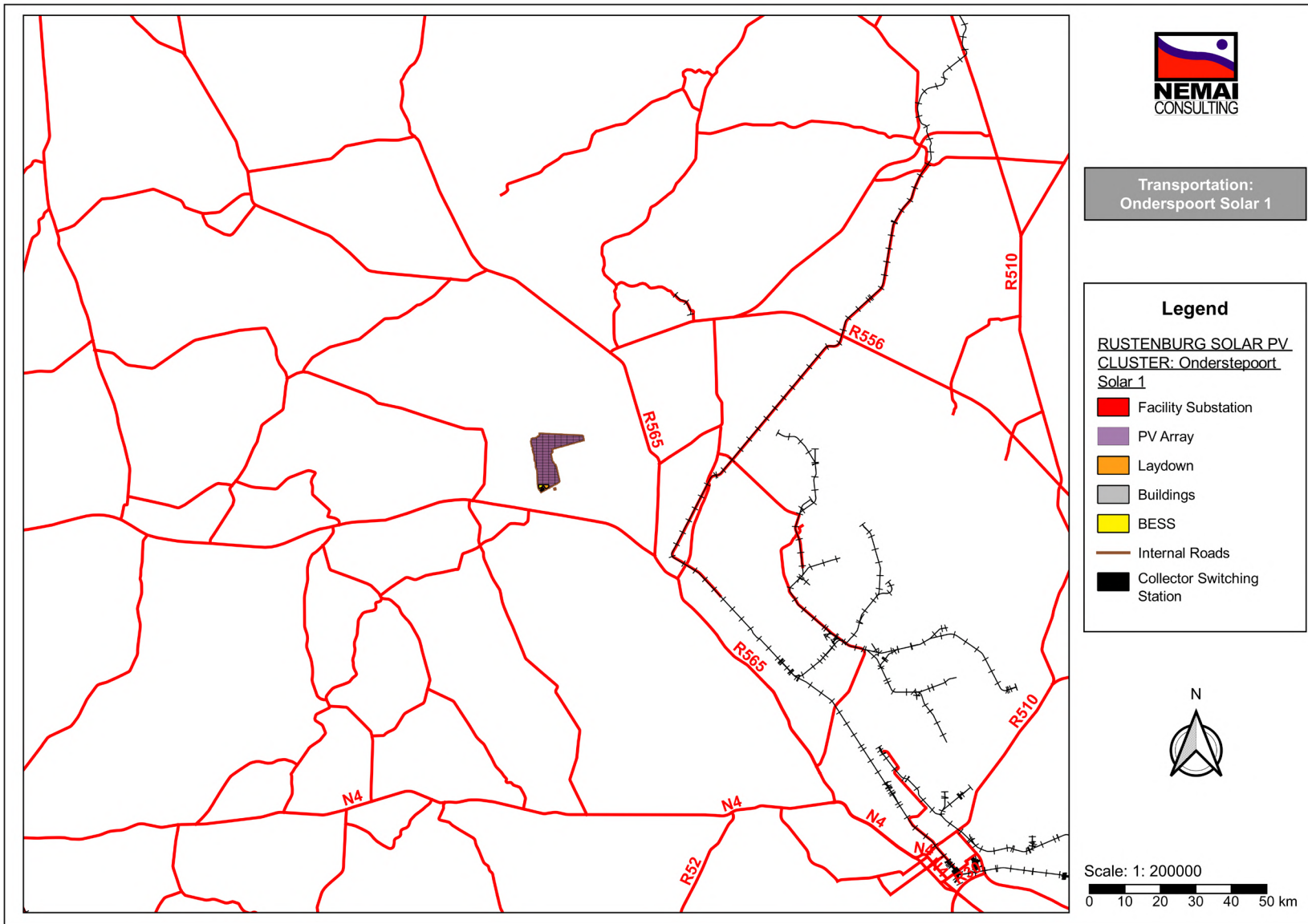


Figure 43: Transportation network

10.17 Health

There are approximately one hundred and twenty-five healthcare facilities across the Bojanala District; of which ten of them have been structured as Community Health Care Centres and offer 24 hours services. In addition, seventeen of these facilities cater 24-hour services to complement the work of the Community Health Centres. In total; there are nineteen Mobile Clinics servicing six hundred and seventy-four service points across the District. The Mobile Clinics are mainly providing preventative and promotive health services (Bojanala Platinum IDP, 2021/22).

11 SUMMARY OF SPECIALIST STUDIES

11.1 Specialist Studies undertaken as part of the EIA

A crucial element of the Plan of Study for the EIA prepared during the Scoping phase was to provide the Terms of Reference for the requisite specialist studies triggered during Scoping. According to Münster (2005), a 'trigger' is "a particular characteristic of either the receiving environment or the proposed project which indicates that there is likely to be an issue and/or potentially significant impact associated with that proposed development that may require specialist input".

The requisite specialist studies 'triggered' by the findings of the Scoping process, aimed at addressing the key issues and compliance with legal obligations, include the following:

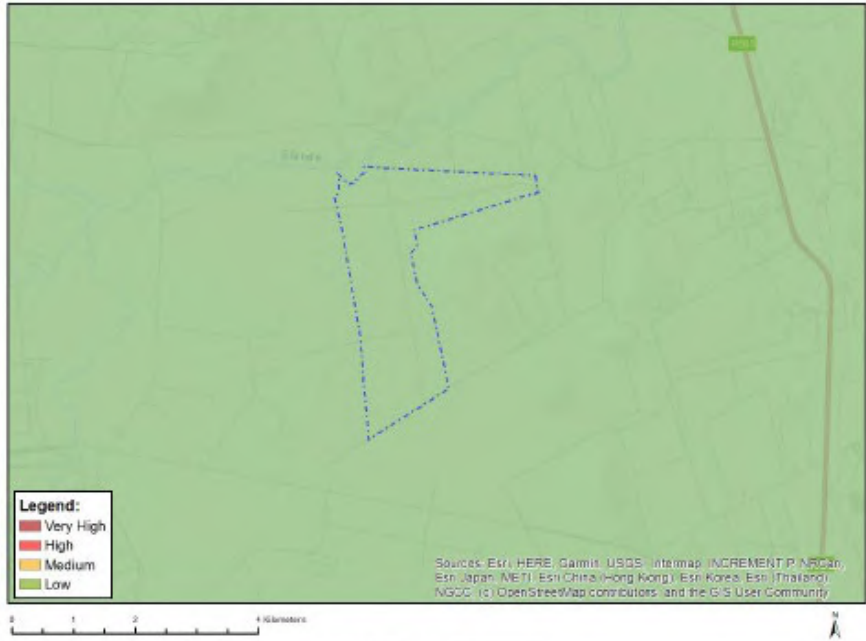
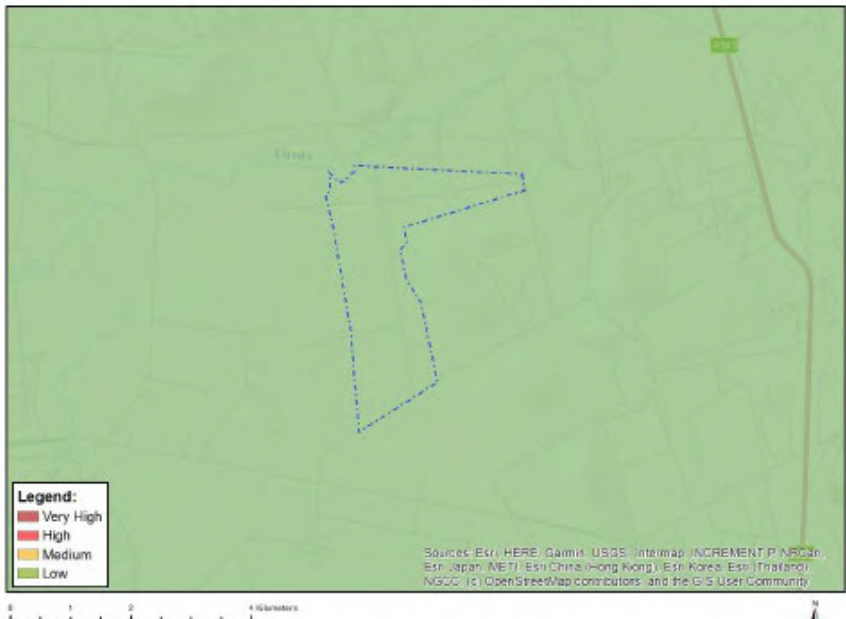
1. Wetland Delineation and Risk Assessment;
2. Terrestrial Biodiversity Compliance Statement;
3. Avifaunal Assessment;
4. Agricultural Impact Compliance Statement;
5. Phase 1 Cultural Heritage Impact Assessment;
6. Paleontological Impact Assessment;
7. Visual Impact Assessment;
8. Traffic Impact Assessment; and
9. Social Impact Assessment.

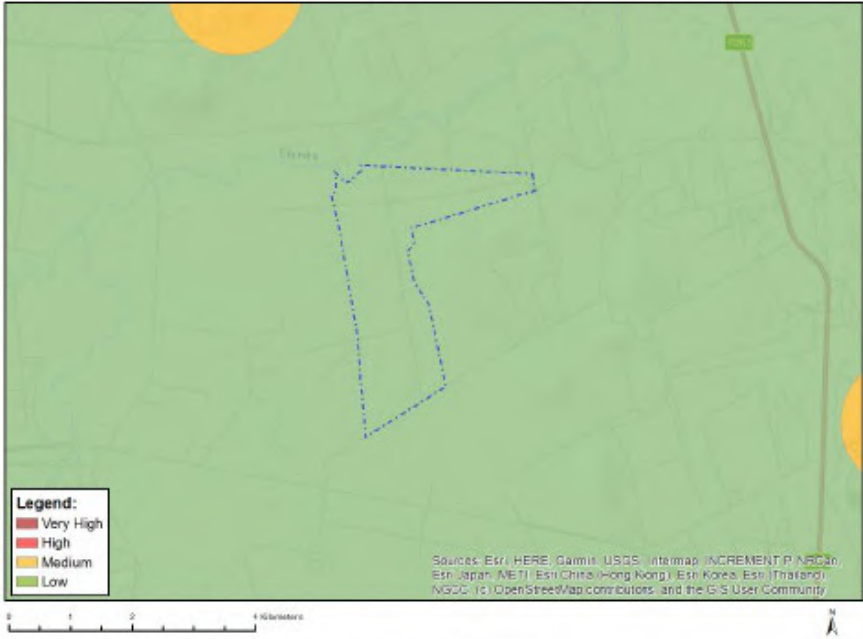
11.2 Excluded Specialist Studies identified during Environmental Screening

As mentioned in **Section 6.3** above, Screening Reports for the proposed PV Site and power line were compiled by means of the Screening Tool, which were appended to the Application Form. **Table 13** below lists the specialist studies that were identified in the Screening Report, but which were not deemed to be necessary.

Table 13: Specialist studies identified in the Screening Report that are deemed unnecessary

Specialist Study identified in Screening Report	Reason for not undertaking the Specialist Study
Civil Aviation Assessment	According to the findings from the Screening Tool, the PV Site has low sensitivity, and the powerline is low sensitivity in terms of the relative civil aviation theme. The Civil Aviation Authority was included in the Project notification. They will further be afforded the opportunity to review the draft EIA Report and to provide comments (See Section 13.23 below). The low sensitivity of the site in terms of the RFI theme is confirmed.

Specialist Study identified in Screening Report	Reason for not undertaking the Specialist Study
	<p>MAP OF RELATIVE CIVIL AVIATION (SOLAR PV) THEME SENSITIVITY</p>  <p>Civil Aviation Theme Sensitivity PV site</p>
<p>Defence Assessment</p>	<p>The map that was created by the Screening Tool showed that the Project Area has low sensitivity in terms of the relative defence theme. Upon interrogation of the surrounding environment, through the site visit, desktop review and satellite imagery, no evidence was found of any military or defence operations or installations. It was thus not deemed necessary to undertake this study. The low sensitivity of the site in terms of the defence theme is confirmed.</p> <p>MAP OF RELATIVE DEFENCE THEME SENSITIVITY</p>  <p>Defence Theme Sensitivity</p>

Specialist Study identified in Screening Report	Reason for not undertaking the Specialist Study
<p>Radio Frequency Interference (RFI) Assessment</p>	<p>The map that was created by the Screening Tool showed that the Project Area has a low sensitivity in terms of the relative RFI theme.</p> <p>The study was not undertaken given the remoteness of the proposed site. Furthermore, research (e.g. United States Federal Aviation Administration, 2010) suggests that RFI from PV installations is low risk. PV systems equipment such as step-up transformers and electrical cables are not sources of electromagnetic interference because of their low frequency of operation and PV panels themselves do not emit EMI. The only component of a PV array that may be capable of emitting EMI is the inverter. Inverters, however, produce extremely low frequency EMI similar to electrical appliances and at a distance of 46 m from the inverters the EM field is at or below background levels.</p> <p>Standard engineering mitigations will be implemented to address RFI at the PV site, as necessary. The low sensitivity of the site in terms of the RFI theme is confirmed.</p> <p>MAP OF RELATIVE RFI THEME SENSITIVITY</p>  <p style="text-align: center;">RFI Theme Sensitivity</p>

11.3 Incorporating the Findings from Specialist Studies

The *Guideline for the review of specialist input in EIA processes* (Keatimilwe & Ashton, 2005) was used for including the findings of the specialist studies into the EIA Report. Key considerations included the following:

- Ensuring that the specialists have adequately addressed I&APs’ issues and specific requirements prescribed by environmental authorities;
- Ensuring that the specialists’ input is relevant, appropriate and unambiguous; and
- Verifying that information regarding the receiving ecological, social and economic environment has been accurately reflected and considered.

The information obtained from the respective specialist studies was incorporated into the EIA Report in the following manner:

- The assumptions and limitations identified in each study were included in **Section 7** above;
- The information was used to complete the description of the receiving environment (**Section 11**) in a more detailed and site-specific manner;
- A summary of each specialist study is contained in the sub-sections to follow (**Sections 12.3 – 12.12** below), focusing on the approach to each study, key findings and conclusions drawn;
- The specialists' impacts assessments, and the identified mitigation measures, were included in the overall project impact assessment contained in **Section 13** below;
- The evaluations performed by the specialists on the alternatives were included in **Section 14** below to identify the most favourable option;
- Specialist input was obtained to address comments made by I&APs that related to specific environmental features pertaining to each specialist discipline; and
- Salient recommendations made by the specialists were taken forward to the final EIA Conclusions in **Section 16** below.

Refer to **Appendix E** for declarations from the respective specialists.

11.4 Wetland Delineation and Risk Assessment

A summary of the Wetland Delineation and Risk Assessment (van Rooyen, 2023) follows. The specialist report is contained in **Appendix E1**.

11.4.1 *Details of the Specialist*

The details of the specialists that undertook the Wetland Delineation and Risk Assessment follow.

Organisation:	Nitai Consulting
Name:	Divan van Rooyen/Antoinette Bootsma
Qualifications:	M.Sc. in Environmental Sciences
No. of years' experience:	1 year/18years
Affiliation (if applicable):	SACNASP (Candidate Natural Scientist – Environmental Science (Registration No. 151272)); IAIA (Membership No. 7063); South African Aquatic Scientists (SASAqS – Membership No. SASAQS0101/ SACNASP Registration No. 400222-09.

11.4.2 *Objectives of the Study*

The objectives of this study included the following:

- To identify, delineate and classify wetlands within the Project Area;
- To assess the Present Ecological State (PES) of the identified wetlands;
- To assess the Wetland Ecosystem Services provided by the identified wetlands;
- To assess the Ecological Importance and Sensitivity (EIS) of the identified wetlands;
- To undertake a risk assessment for the proposed development; and

- To provide mitigation measures and recommendations for the identified risks.

11.4.3 Methodology

The assessment included the following tasks (amongst others):

- Identifying and mapping of wetlands. The National Wetland Classification Systems (NWCS) developed by SANBI was considered for this study.
- Delineating wetland areas in accordance with the guideline: A practical field procedure for identification and delineation of wetlands and riparian areas (DWAF, 2005).
- Determining the PES;
- Determining the EIS;
- Determining buffer requirements; and
- Undertaking a risk-based impact assessment.

11.4.4 Key Findings of the Study

A description of the surface water features in the Project Area is contained in **Section 11.7** above.

Key findings from the study follow.

11.4.4.1 Wetlands and dams

No wetlands were identified within the footprint of either Alternative 1 or 2 layouts of Onderstepoort Solar 1. Several dams and reservoirs are situated within the Alternative 1 study area (see **Figure 44** and **Figure 45**).

11.4.4.2 Riparian Zone

Two riparian zones were identified during the site visits. The one riparian zone being that of the Elands River and the other being the riparian zone of the non-perennial river. Vegetation species in these two riparian zones comprised of woody and non woody species such as *Diospyros lycioides*, *Searsia lancea*, *Vachelia karoo*, *Ziziphus mucronata*, *Eragrostis chloromelas*, *Eragrostis rigidior*, *Aristida congesta* subsp *congesta*, *Aristida congesta* subsp *barbicollis*, *Setaria sphacelata* var *torta*, *Cynodon dactylon*, *Eragrostis trichophora*, *Tagetes minuta*, and *Zinia peruviana*. The study area traverses small sections of this non-perennial riparian zone at a few of areas while the Alternative 1 layout traverses one small section of the Elands River Riparian Zone.

Alternative 2 does take into account both riparian zones as well as its 32 m buffer zones and is therefore outside any freshwater sensitive features (see **Figure 46**).

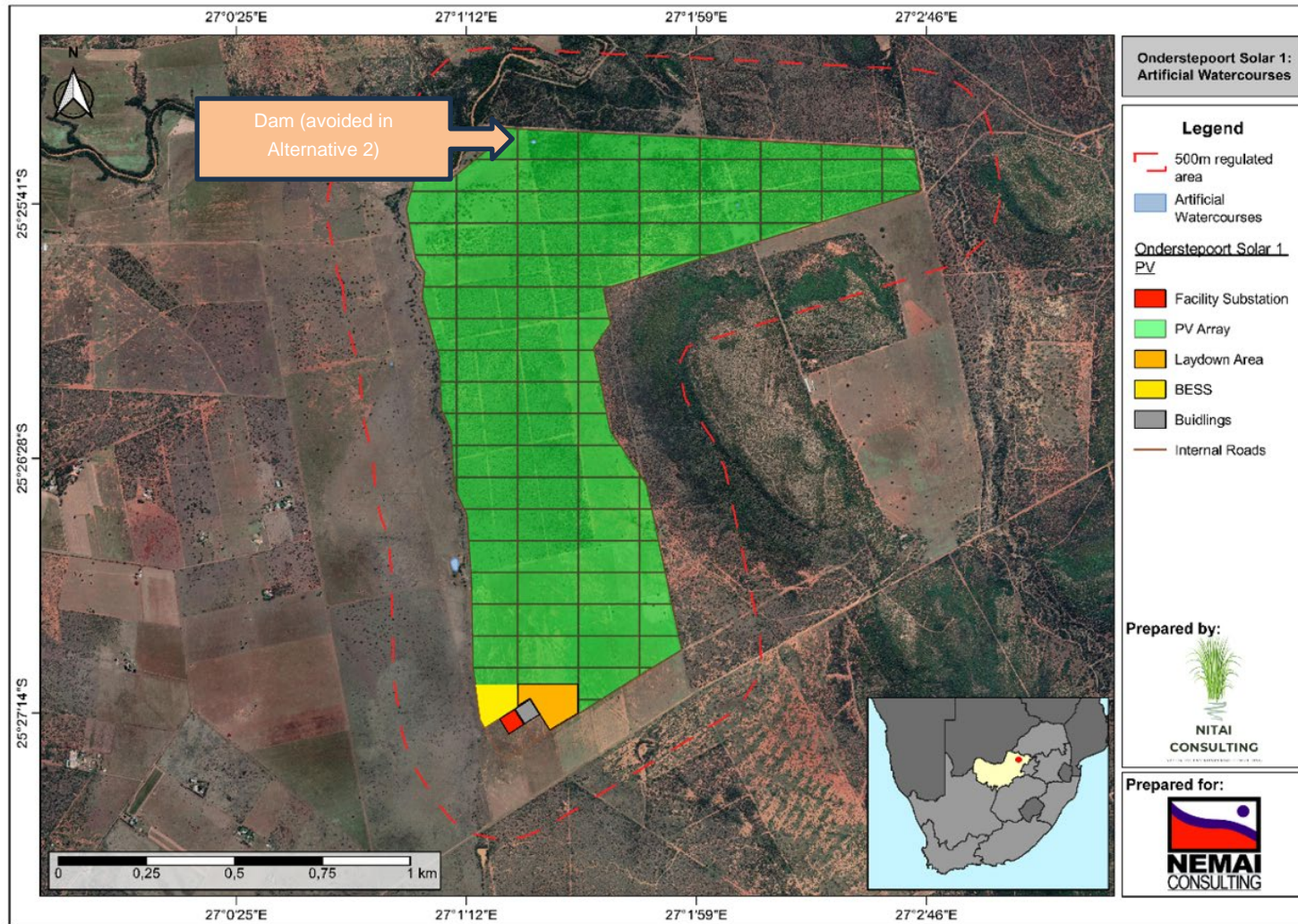


Figure 44: Riparian Zones associated with the Alternative 1

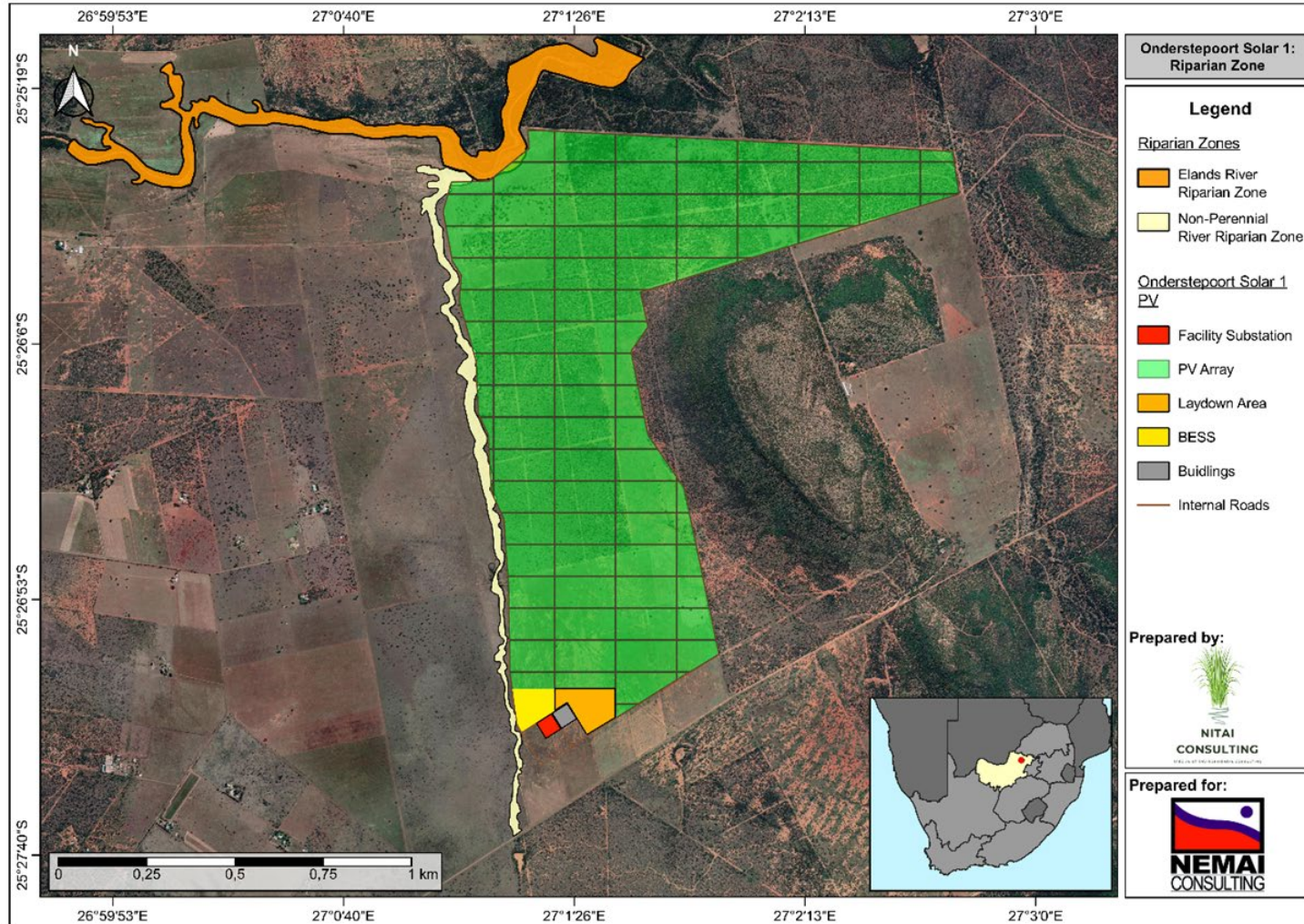


Figure 45: Riparian Zones associated with the Alternative 1

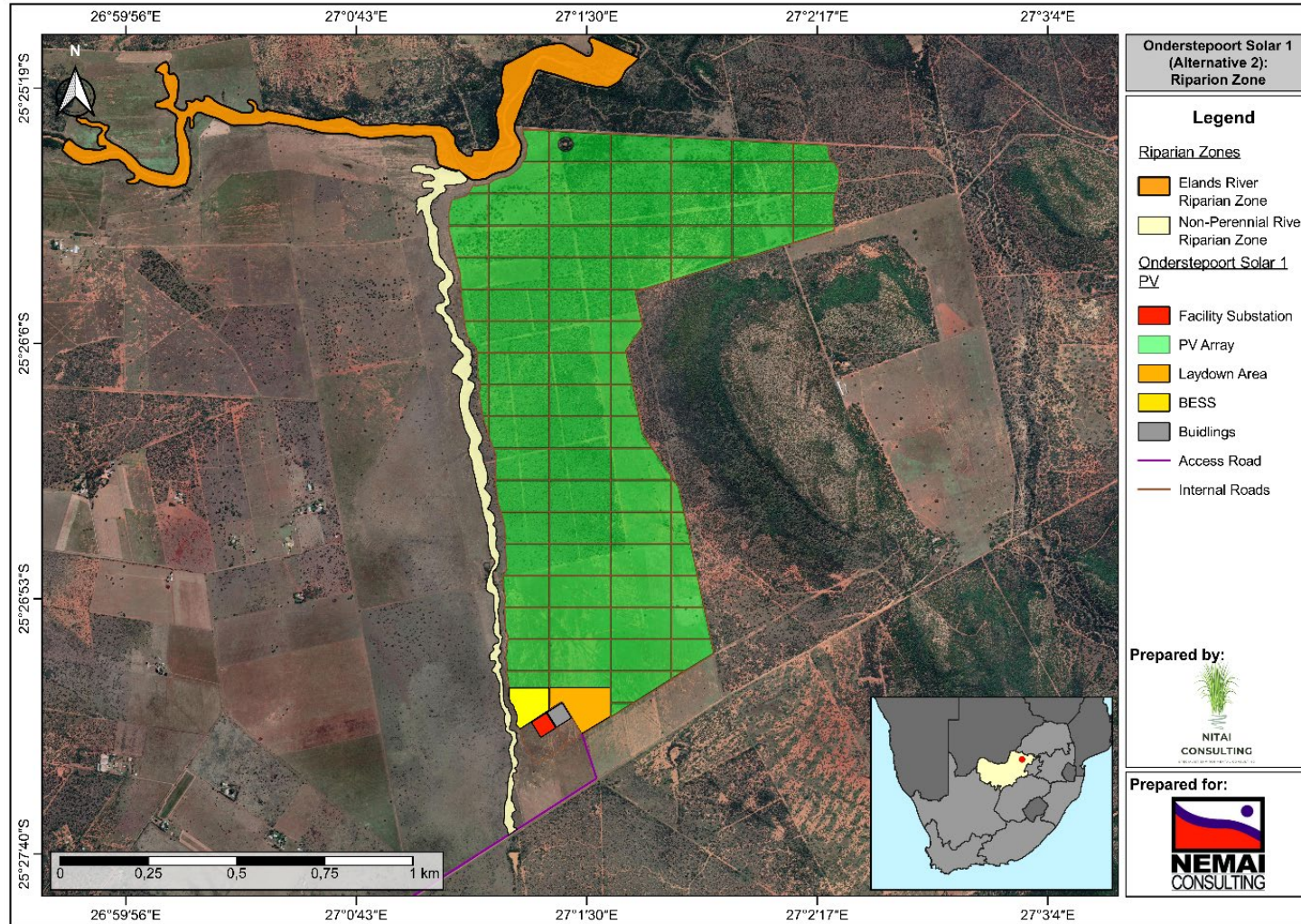


Figure 46: Riparian Zones associated with the Alternative 2

11.4.4.3 Rivers and Drainage Lines

For Alternative 1, one perennial river, Elands River, was found north of the study area and is flowing to the northwards away from the study area and drains into Lindleyspoort Dam (see **Figure 47 and 48 below**). One non-perennial river was also identified to occur adjacent to the study area. Additionally, drainage lines were identified in close proximity to the non-perennial river. The drainage lines transport excess water into the non-perennial river.

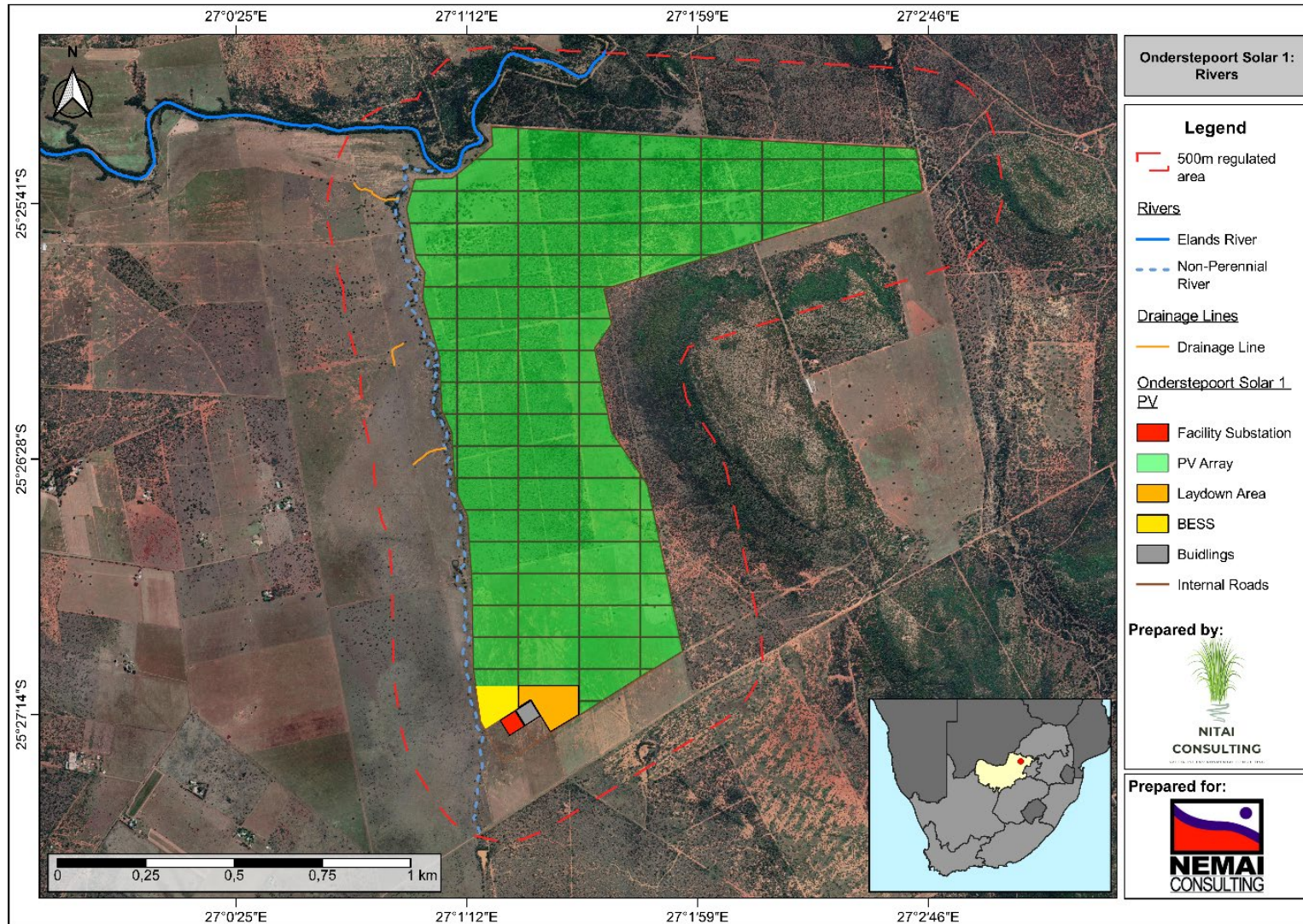


Figure 47: All identified rivers and drainage lines within the study area (Alternative 1) (van Rooyen, 2023)

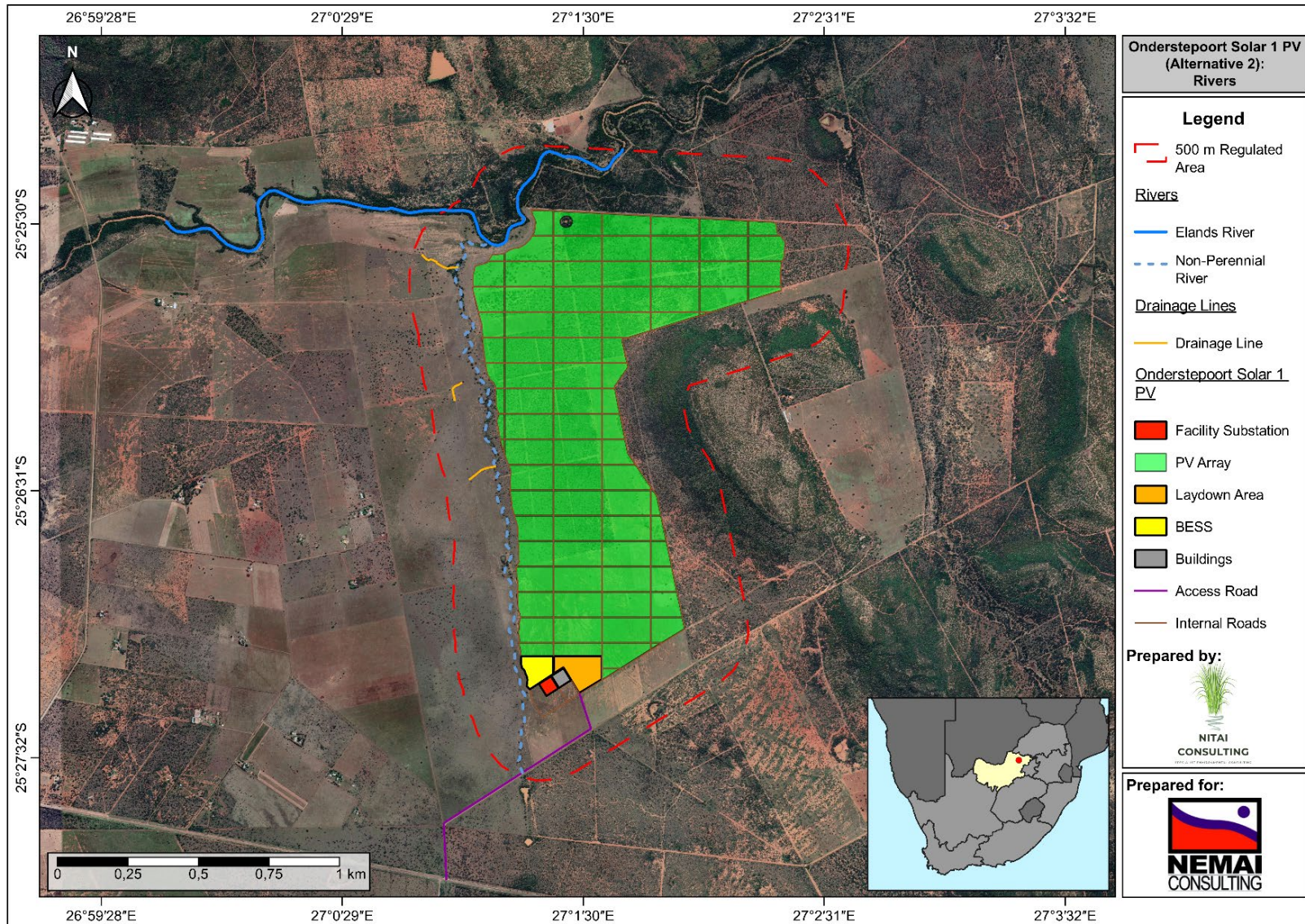


Figure 48: All identified rivers and drainage lines within the study area (Alternative 2)

11.4.4.4 Present Ecological State (PES)

The PES has not been determined for the rivers and drainage lines and was only determined for the non-perennial riparian zone using the Riparian Vegetation Response Assessment Index (VEGRAI) (Kleynhans et al., 2007). The VEGRAI for the non-perennial riparian zone was determined as a Category D (Largely Modified) (Table 14). The assessment considered the influence of cattle grazing, wildlife and medium to low density of alien and invasive plant species. The high density of livestock in areas along the riparian zone has contributed to the change and loss of natural habitat. However, the riparian zone's ecosystem functions remains intact.

Table 14: Riparian Vegetation Response Assessment Index score calculated for the non-perennial riparian zone (van Rooyen, 2023)

Level 3 Assessment					
Metric Group	Calculated Rating	Weighted Rating	Confidence	Rank	% Weight
Marginal	56.7	25.2	3.3	2.0	80.0
Non-marginal	48.3	26.9	3.3	1.0	100.0
2.0					180.0
Level 3 VEGRAI (%)				52.0	
VEGRAI EC				D	
Average Confidence				3.3	

11.4.4.5 The Ecological Importance

Following the method of Rountree et al. (2013), the EIS was determined for the unnamed non-perennial river adjacent to the Onderstepoort Solar 1 PV footprint (Table 15). The EIS for the non-perennial river was determined as 1.50 which translates to a Category C (Moderate). The score reflects the Ecological Importance and Sensitivity due to the riparian zone located within an ESA. In addition, the score also reflects the Hydrological/Functional Importance of the Riparian Zone in the role it plays in flood attenuation and sediment trapping for the downstream Elands River.

Table 15: Ecological Importance and Sensitivity of the unnamed non-perennial river (van Rooyen, 2023)

River	Ecological Importance and Sensitivity
Non-perennial River	<p style="text-align: center;">Moderate (1.50)</p> <ol style="list-style-type: none"> 1. Ecological Importance & Sensitivity: 2.0 2. Hydrological/Functional Importance: 2.0 3. Direct Human Benefits: 0.5

11.4.4.6 Wetland Ecosystem Services

Since no wetland was found within the Onderstepoort Solar 1 PV footprint, Wetland Ecosystem Services (Kotze et al., 2020) was determined for the unnamed non-perennial river adjacent to the

PV site (Table 16). Please refer to Table 17 for description of impact category ratings. The riparian zone is moderately important for biodiversity maintenance as well as for food for livestock since the area is being used for livestock grazing as well as game. In addition, the riparian zone is situated within an ESA that increases its importance in supporting the ecological functioning of critical biodiversity areas and/or in delivering ecosystem services that support socio-economic development, such as water provision, flood mitigation or carbon sequestration. Moreover, the riparian zone is of low importance for harvestable resources and cultivated foods.

Table 16: Wetland Ecosystem Services calculated for the non-perennial river Riparian Zone (van Rooyen, 2023)

Ecosystem Services		Score	
		Non-perennial River Score	Importance
Regulating and Supporting Services	Flood attenuation	0.0	Very Low
	Stream flow regulation	No score	No score
	Sediment trapping	0.0	Very Low
	Erosion control	0.5	Very Low
	Phosphate assimilation	0.0	Very Low
	Nitrate assimilation	0.0	Very Low
	Toxicant assimilation	0.0	Very Low
	Carbon storage	0.8	Very Low
	Biodiversity maintenance	1.7	Moderate
Provisioning services	Water for human use	0.0	Very Low
	Harvestable resources	1.2	Low
	Food for livestock	2.0	Moderate
	Cultivated foods	1.3	Low
Cultural Services	Tourism and Recreation	0.0	Very Low
	Education and Research	0.3	Very Low
	Cultural and Spiritual	0.0	Very Low

Table 17: Importance Category ratings (van Rooyen, 2023)

Importance Category		Description
Very Low	0-0.79	The importance of services supplied is very low relative to that supplied by other wetlands.
Low	0.8 – 1.29	The importance of services supplied is low relative to that supplied by other wetlands.
Moderately-Low	1.3 – 1.69	The importance of services supplied is moderately-low relative to that supplied by other wetlands.

Moderate	1.7 – 2.29	The importance of services supplied is moderate relative to that supplied by other wetlands.
Moderately-High	2.3 – 2.69	The importance of services supplied is moderately-high relative to that supplied by other wetlands.
High	2.7 – 3.19	The importance of services supplied is high relative to that supplied by other wetlands.
Very High	3.2 - 4.0	The importance of services supplied is very high relative to that supplied by other wetlands.

11.4.4.7 Sensitivity and Buffer Analysis

The DFFE Screening Tool Report has identified that Aquatic Biodiversity Theme for the study area is of very high sensitivity together with low sensitivity (see **Figure 49** below). The very high sensitivity is due to watercourses situated in close proximity to the Onderstepoort Solar 1 PV Facility.

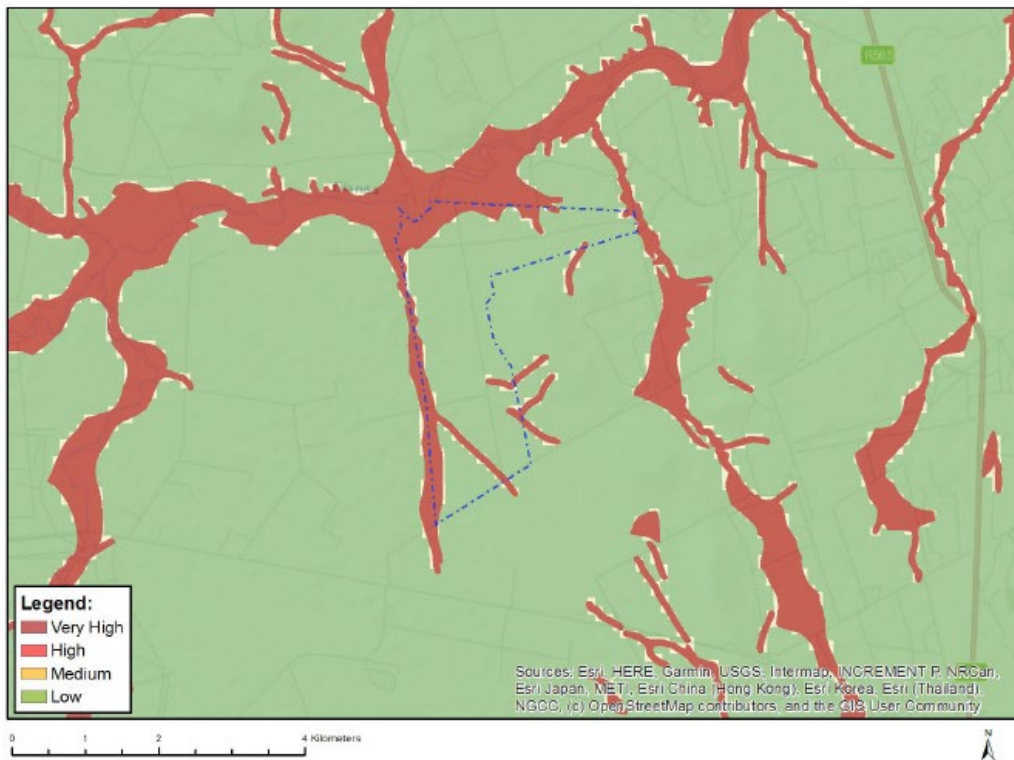


Figure 49: Aquatic Biodiversity Sensitivity Theme from the Department of Forestry, Fisheries & the Environment Screening Tool

Ground truthing the Alternative 1 layout with site visits during Summer (January 2023), the study area could be classified as Very High sensitivity due to the PV site encroaching into the riparian zones of both the Elands River and non-perennial river as well as a small dam to the north of the footprint. In addition, majority of the Alternative 1 layout was classified as Low sensitivity whereas the non-perennial river and Elands River was classified as High while the small dam and Riparian Zones of the non-perennial river and Elands River was classified as Medium sensitivity (Figure 50).

As a result, the PV site layout has been revised and the Alternative 2 layout (preferred layout) is outside of the riparian zones and the small dam (discussed below) (Figure 51). In addition, the Alternative 2 layout is outside the recommended buffer zones. Therefore, the Alternative 2 layout has an overall Low sensitivity to freshwater features. Importantly, based on these sensitivity classifications, the Preferred Alternative for the proposed development is Alternative 2.

Buffer zones for all watercourses (wetlands, rivers and riparian zone) were determined based on the current condition of these watercourses. The buffer zones determined for the wetland, rivers and riparian zones were based on the Macfarlane and Bredin (2017) guidelines. As such, the minimum buffer zones were determined as 32 m (see Figure 52 and Figure 53 below).

Between the two alternatives for Onderstepoort Solar 1 PV Facility, Alternative 1 is encroaching the 32 m buffer zones for the riparian zones. Also, the layout does not only encroach into the buffer zones, but the watercourses itself (Figure 52). Alternative 2 has made provision for the 32 m buffer zone around the watercourses and as such does not encroach into the buffer zone as well as the watercourse (Figure 53).

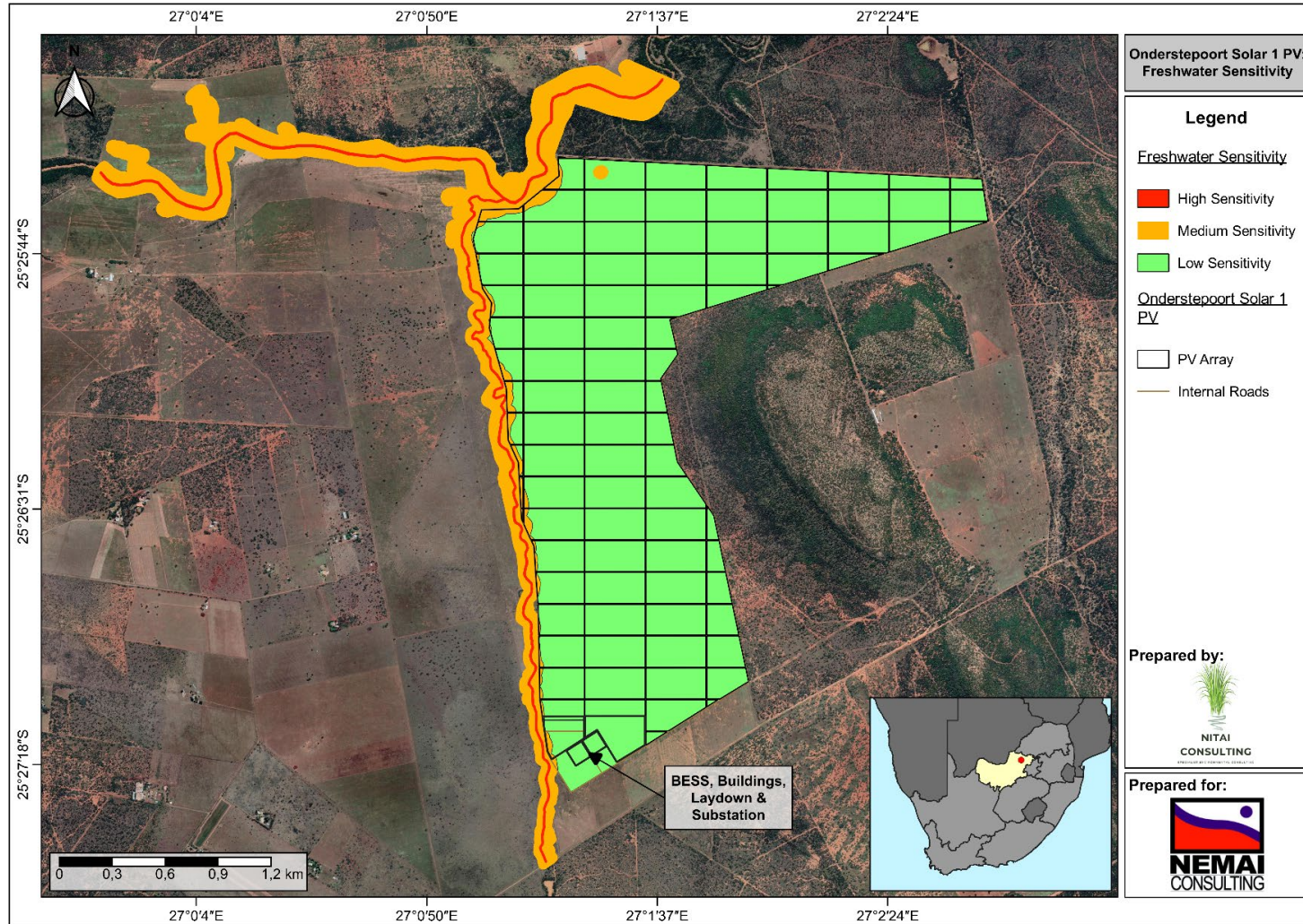


Figure 50: Freshwater Sensitivities associated with the proposed Alternative 1 layout

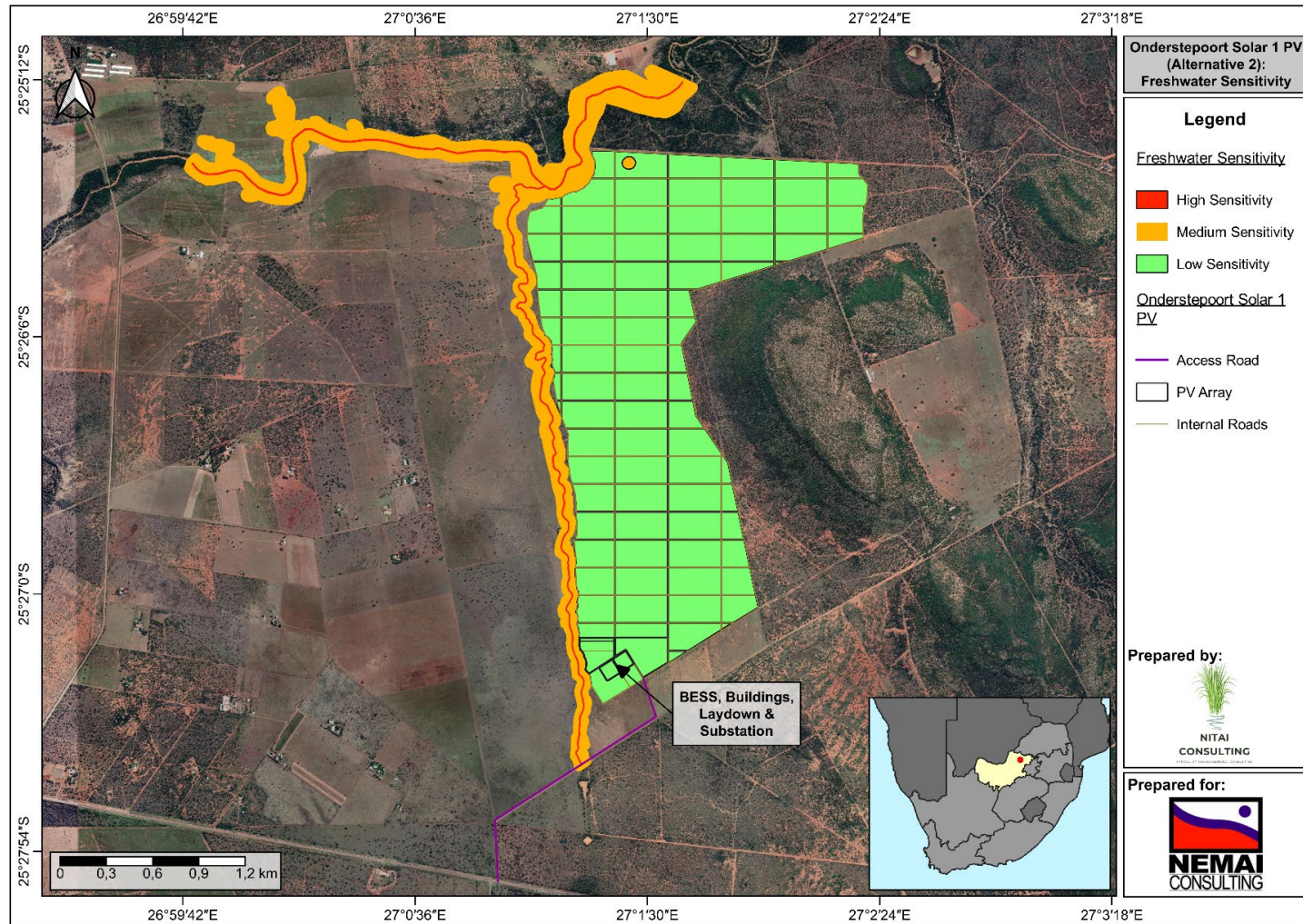


Figure 51: Freshwater Sensitivities associated with the proposed Alternative 2 and Preferred Layout

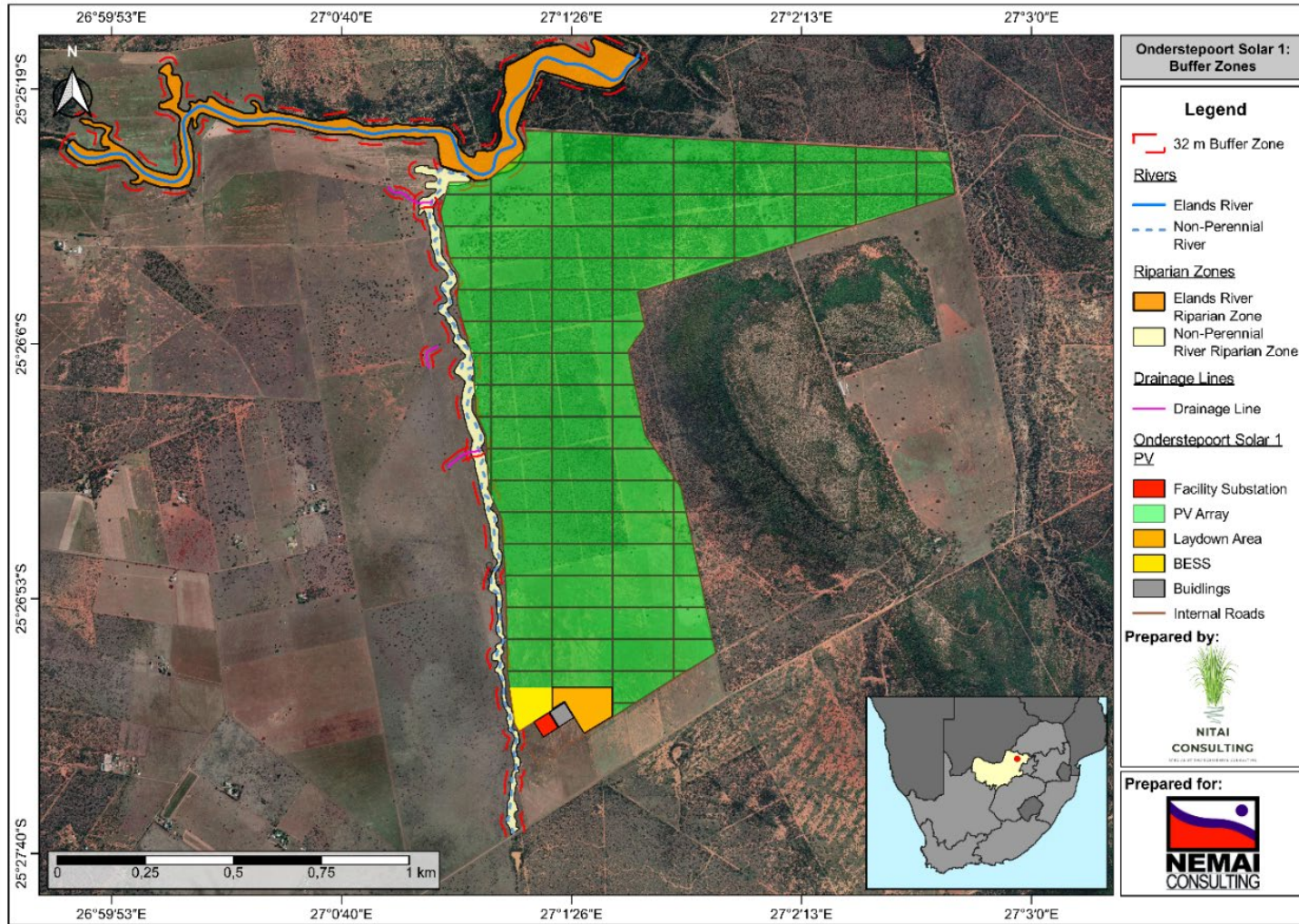


Figure 52: Buffer zones determined for all watercourses associated with the study area (Alternative 1)

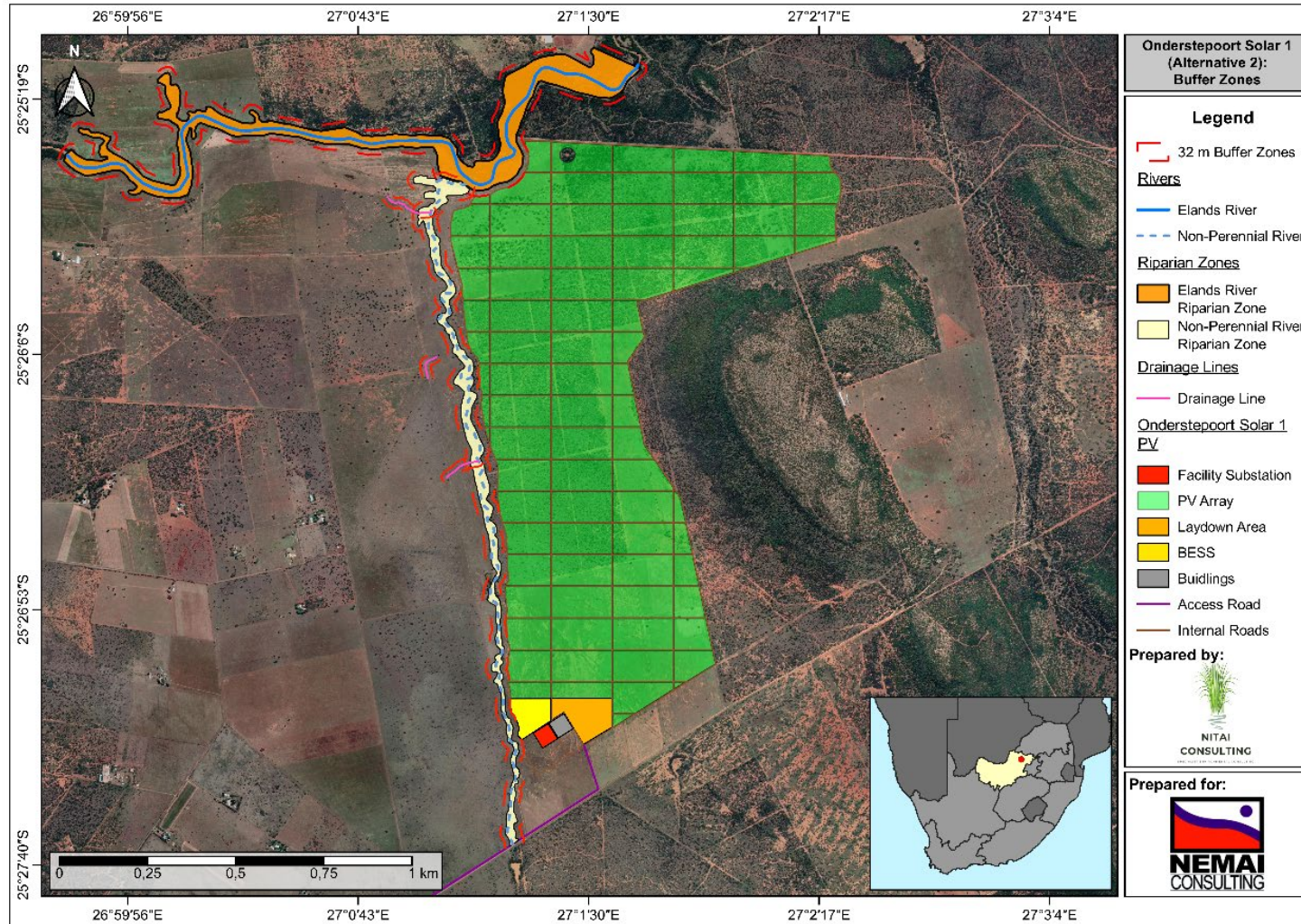


Figure 53: Buffer zones determined for all watercourses associated with the study area (Alternative 2 and Preferred layout)

11.4.5 *Impact Assessment*

Refer to **Section 13.12.2** below for the results from the impact assessment from this study.

11.4.6 *Conclusions*

The Onderstepoort Solar 1 PV Facility is situated near Rustenburg in the North West Province of South Africa. During site visits to the study area, several watercourses were identified such as rivers (perennial and non-perennial), drainage lines and a dam. In addition, two riparian zones along the Elands River and a non-perennial river were also identified. These riparian zones were identified based on wet soil indicators as well as vegetation indicators. Furthermore, no wetland was found to be within the development footprint, instead, the study area was mostly comprised of well drained soil and terrestrial vegetation species.

The area, according to spatial data, has been mostly characterised as Glenrosa, Arcadia, Shortland and Hutton soils. Soil augered samples indicated that the riparian zones were mostly either Arcadia or Shortland soils and indicated in some areas strong clay content and soil wetness indicators (mottling). Vegetation species indicating wetness was found and was rather confined to the just the riparian zone.

Although the DFFE Screening Tool has identified the area as a very high sensitivity from an Aquatic Biodiversity Theme perspective. This is due to rivers within and close the study area as well as ESA 1 and 2. However, it is of the opinion of the specialist that the activities will not have a significant impact on the associated watercourses, given the mitigation measures are followed and best practise pollution control.

Since the site visits to the study area and based on the freshwater sensitivity features identified, the proponent has subsequently revised the layout for Onderstepoort Solar 1 PV Facility. The revised layout has taken the freshwater sensitivities into account and therefore the revised layout is outside of these sensitive areas. Therefore, it is of the opinion of the specialist that the development of the Onderstepoort Solar 1 PV Facility (using Alternative 2 as final layout) can continue as the activities will not significantly impact the associated watercourses.

11.5 Terrestrial Impact Assessment

A summary of the Terrestrial Impact Assessment (Human, 2023) follows. The specialist report is contained in **Appendix E2**.

11.5.1 *Details of the Specialist*

The details of the specialists that compiled the Terrestrial Biodiversity Impact Assessment follow.

Organisation:	Nitai Consulting
Name:	H.E. Human
Qualifications:	M-Tech Degree Nature Conservation
No. of years' experience:	13
Affiliation (if applicable):	SACNASP Professional Natural Scientist (Registration No.: (147031)

11.5.2 *Objectives of the Study*

The principal aim of this study was to adequately assess the current state of the terrestrial biodiversity in order to identify any significant and/or sensitive ecological receptors that may be impacted upon by the proposed Project.

The following tasks were completed in fulfilment of the terms of reference for this study:

- Description of the baseline receiving environment specific to the field of expertise (including the general surrounding area as well as the site-specific environment);
- Identification and description of any sensitive receptors in terms of relevant specialist disciplines (i.e., terrestrial biodiversity) that occur in the Project Area, and the manner in which these sensitive receptors may be affected by the activity;
- Identification of significant ecological, botanical and faunal features within the proposed Project Area;
- Identification of conservation significant habitats around the Project Area which might be impacted;
- Screening to identify any critical issues (potential fatal flaws) that may result in a rejection of the application;
- Provide a map to identify sensitive receptors in the Project Area, based on available maps and database information; and
- Presentation of recommend mitigation measures (outcomes to be included in the EMP) that should be used to mitigate or minimise impacts from the activity, either on terrestrial habitat or ecology directly.

11.5.3 *Methodology*

The assessment included the following tasks (amongst others):

- Existing data layers were incorporated into GIS software to establish how the proposed Project might interact with any ecologically important features.
- A botanical assessment was undertaken, which encompassed an assessment of all the vegetation units and habitat types within the Project area. This focused on an ecological assessment of habitat types as well as identification of any Red Data species within known distribution of the Project area. The field work methodology included timed meanders, sensitivity analysis based on structural and species diversity, identification of protected floral species, and identification of floral red-data or red-listed species (SCC).
- A faunal assessment was undertaken, which included the following:
 - The faunal desktop assessment encompassed:
 - Compilation of expected species lists;
 - Identification of any Red Data or SCC potentially occurring in the area; and
 - Emphasis was placed on the probability of occurrence of species of provincial, national and international conservation importance.
 - The field survey component of the assessment utilised a variety of sampling techniques including, but not limited to, the following -
 - Visual observations;
 - Active hand-searches, used for species that shelter in or under particular micro-habitats;
 - Identification of tracks and signs; and
 - Utilisation of local knowledge.
 - Various field guides and texts were consulted for identification purposes in the field during the survey.

A field survey conducted to ground truth the floral, faunal, and habitat features of the project area. Sampling took place the 19th and 24th of January 2023.

11.5.4 *Key Findings of the Study*

A description of the terrestrial ecological features in the Project Area is contained in **Section 11.8** above. Key findings from the study follow.

11.5.4.1 Habitat Survey and Site Ecological Importance

The main habitat types identified across the project area were initially identified largely based on aerial imagery. These main habitat types were refined based on the field coverage and data collected during the survey; the delineated habitats can be seen in **Figure 54** below. Emphasis was placed on limiting timed meander searches along the proposed project area within the natural habitats and therefore habitats with a higher potential of hosting SCC. The site is within an area of natural bushveld but degraded (from heavily to medium). The calculation of Site Ecological Importance and guidelines for development activities within different importance levels are given in the below:

1. Very High – Avoidance mitigation – no destructive development activities should be considered. Offset mitigation not acceptable/ not possible (i.e., last remaining populations of species, last remaining good condition patches of ecosystems/ unique species assemblages). Destructive impacts for species/ecosystems where persistence target remains.
2. High – Avoidance mitigation wherever possible. Minimisation mitigation – changes to project infrastructure design to limit the amount of habitat impacted, limited development activities of low impact acceptable. Offset mitigation may be required for high impact activities.
3. Medium – Minimisation and restoration mitigation – development activities of medium impact acceptable followed by appropriate restoration activities.
4. Low - Minimisation and restoration mitigation – development activities of medium to high impact acceptable followed by appropriate restoration activities.

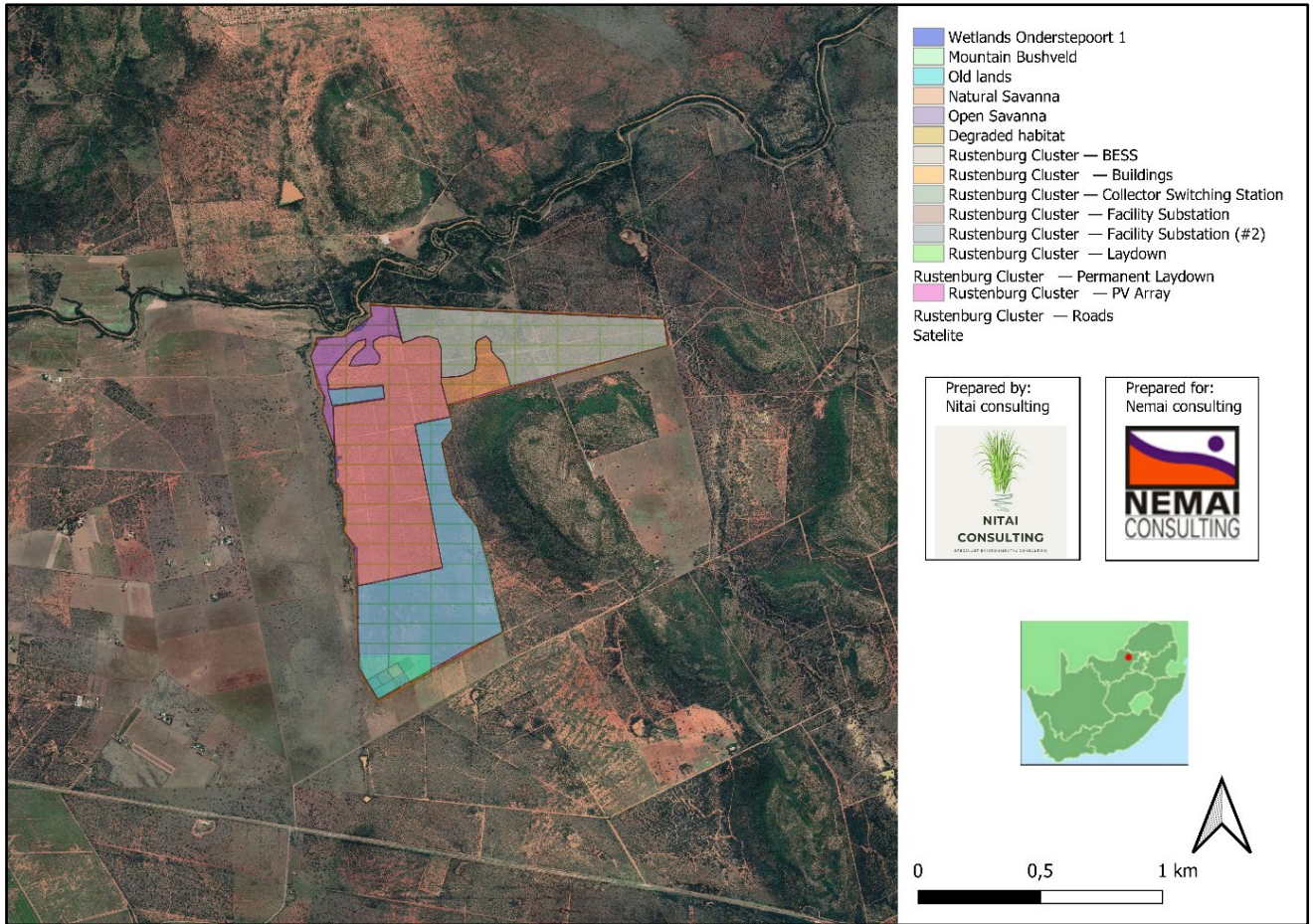


Figure 54: Habitat units found on site

Table 18 Site Ecological Importance assessment summary of the habitat types delineated within the project area (Human, 2023)

	Receptor resilience	Biodiversity Importance	Site Ecological Importance
Natural savanna	Medium	Medium	Medium
Riparian areas/ Drainage areas	Low	Medium	High
Mountain Bushveld	Low	Medium	High
Open Savanna	Medium	Medium	Medium
Old lands	Medium	Medium	Medium
Alien species	High	Very Low	Very Low
Degraded areas	Medium	Very Low	Very Low
Transformed areas	Medium	Very Low	Very Low

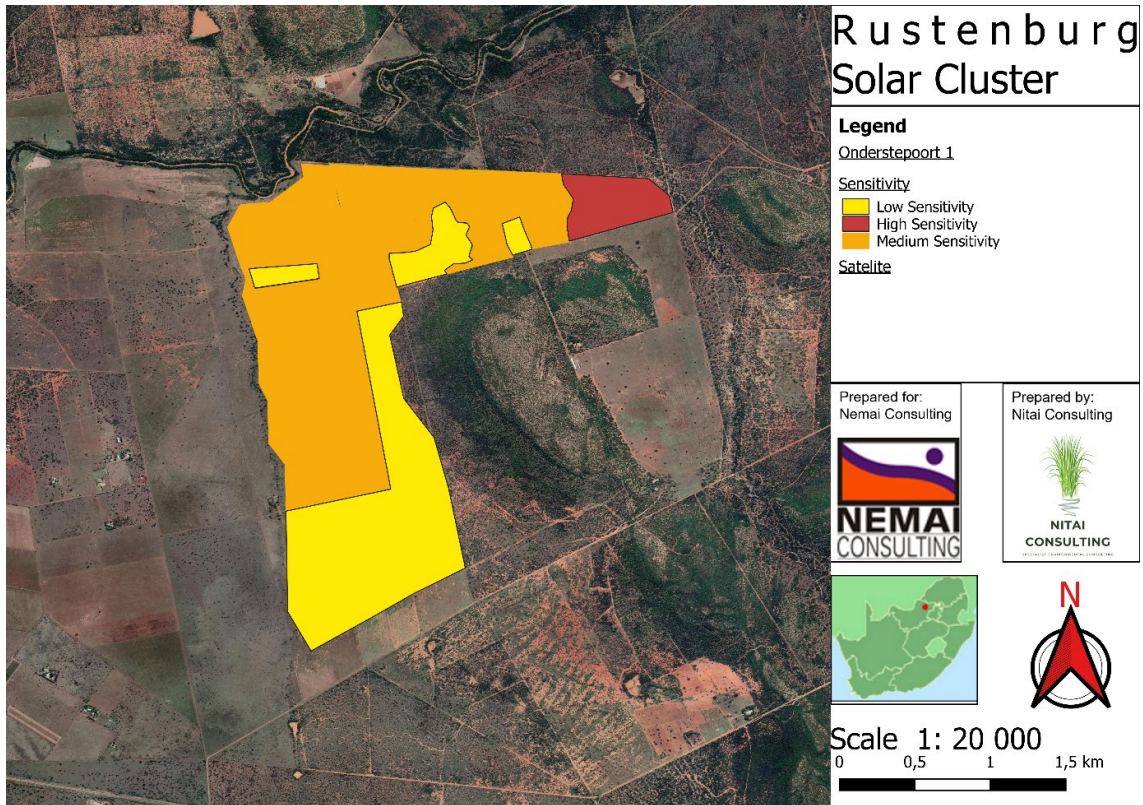


Figure 55: Sensitivity of the project area, Alternative 1. (Human, 2023)

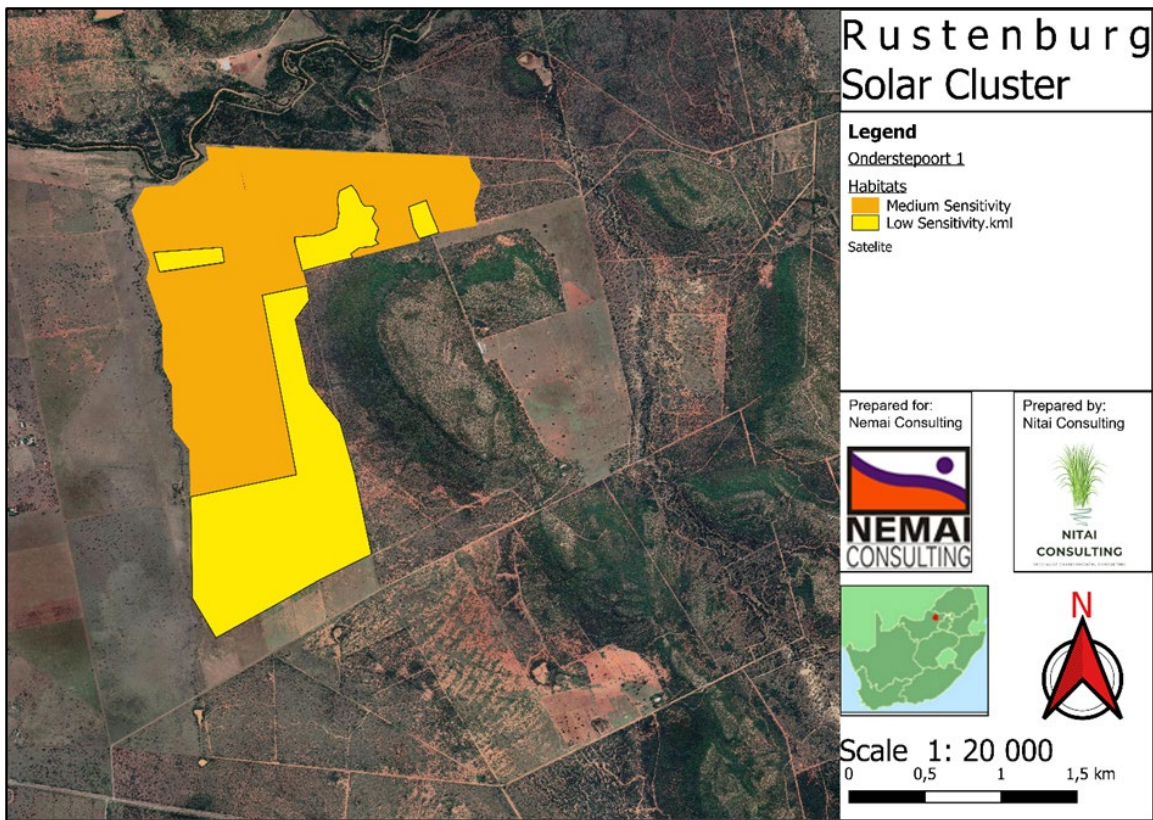
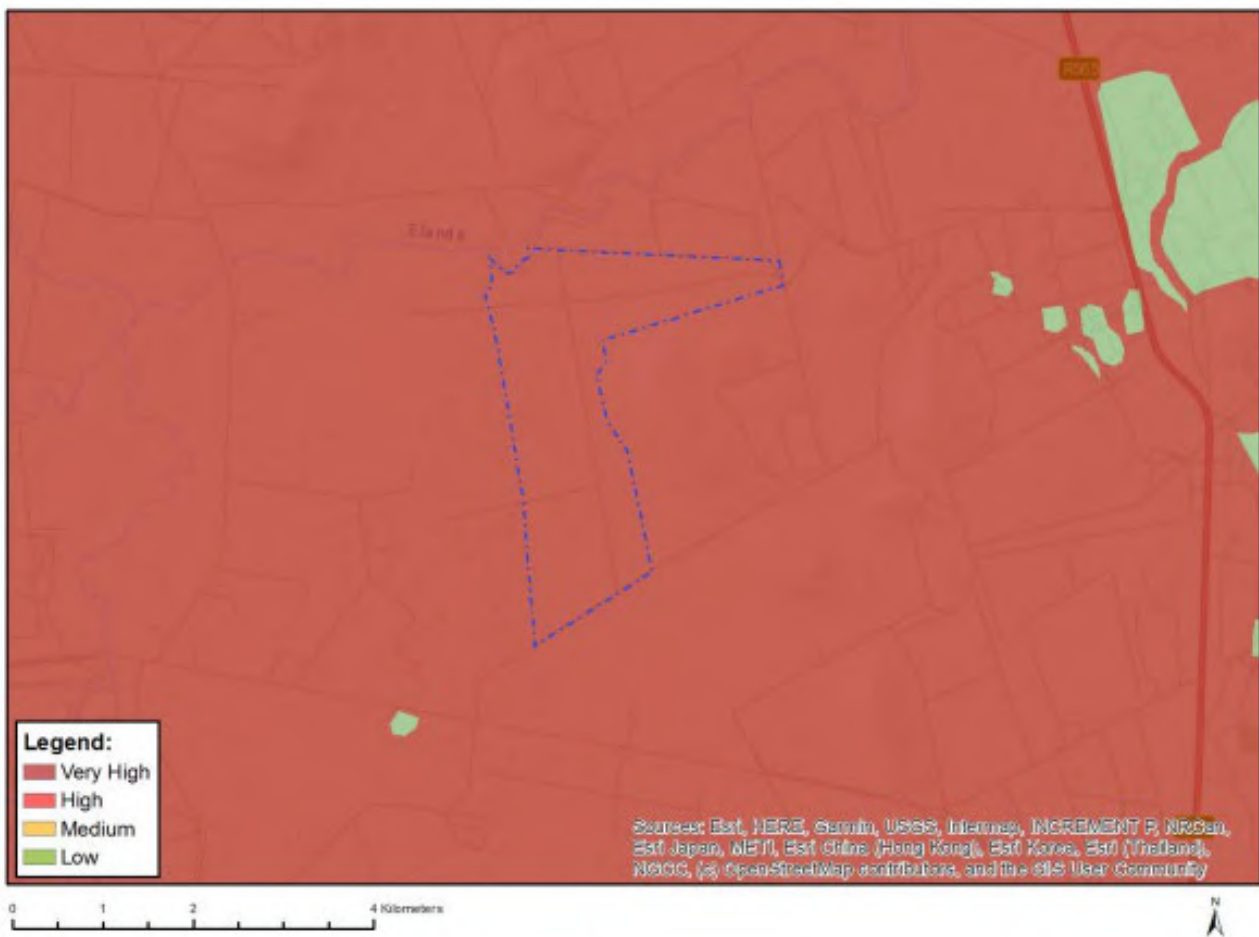


Figure 56: Sensitivity of the project area, Alternative 2. (Human, 2023)

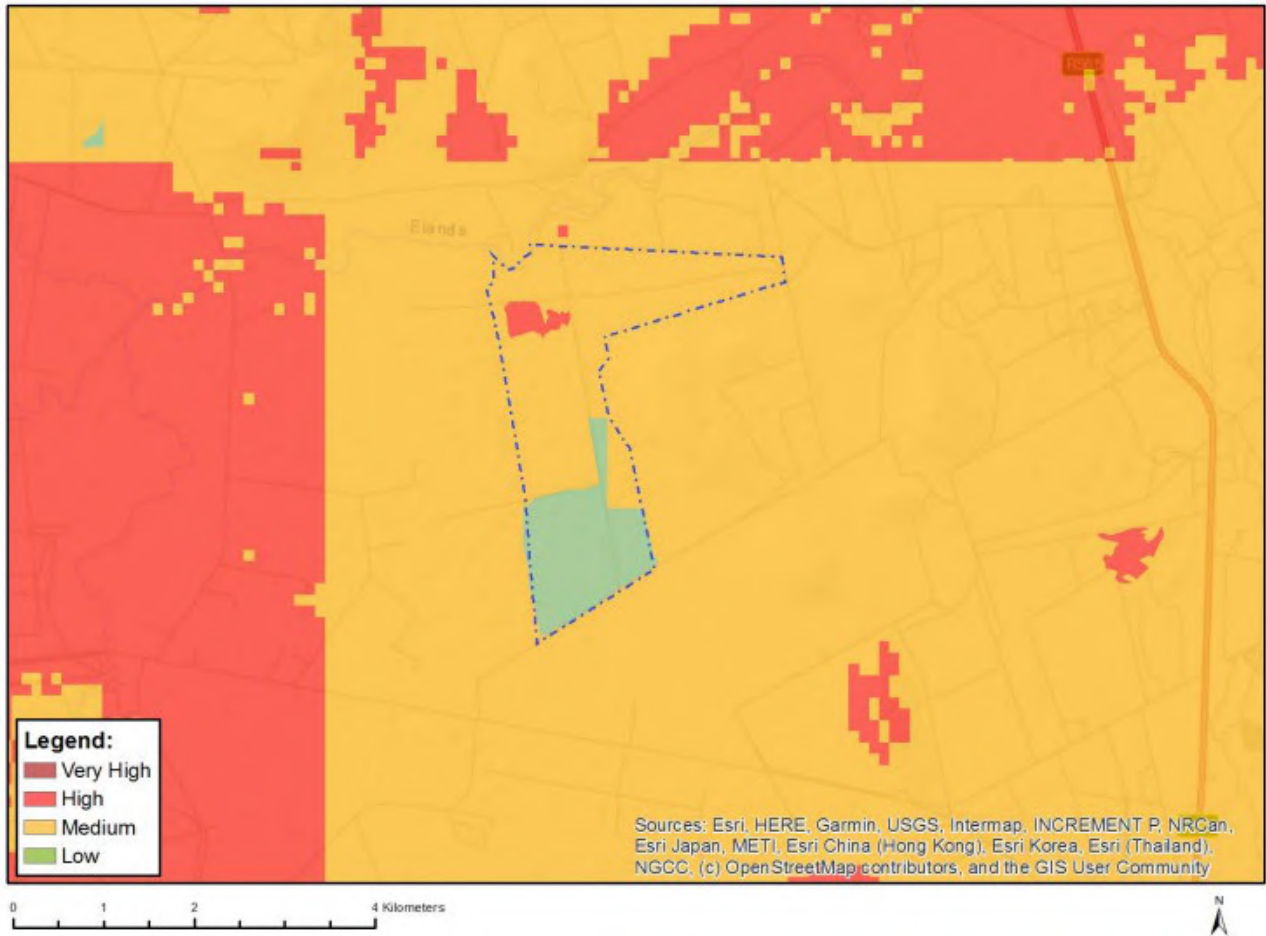
According to the National Web based Environmental Screening Tool:

1. The terrestrial biodiversity sensitivity theme is very high (**Figure 57**) due the fact it forms part of Critical Biodiversity area 2 (CBA 2), Ecological support area 1 & 2 (ESA 1&2) as well as part of the Protected Areas Expansion Strategy. The completion of the terrestrial biodiversity assessment found that the Old Lands, Natural Savanna, Open Savanna, Alien Invasive, Transformed and Degraded habitats which overlap with the screening report is of low and medium sensitivity and thus do not corroborate the screening report in that regard. It was however found that the Mountain Bushveld, Wetlands and Riparian habitat overlaps with the High Sensitivity and corroborates the CBA 2 area and is of High sensitivity as the screening tool suggests.
2. The Animal species theme is high (**Figure 58**) due to potential presence of *Torgos tracheliotus* (High), *Aquila rapax* (Medium), Sensitive species 5 (Medium), *Crocidura maquassiensis* (Medium), *Dasymys robbertsii* (Medium) and *Kinixys lobatsiana* (Medium).
3. The Plant species theme is medium (**Figure 59**) due to potential presence of *Cullen hollub*.



Sensitivity	Feature(s)
Very High	Critical biodiversity area 2
Very High	Ecological support area 1
Very High	Ecological support area 2
Very High	Protected Areas Expansion Strategy

Figure 57: Biodiversity sensitivity, National Web based Environmental Screening Tool.

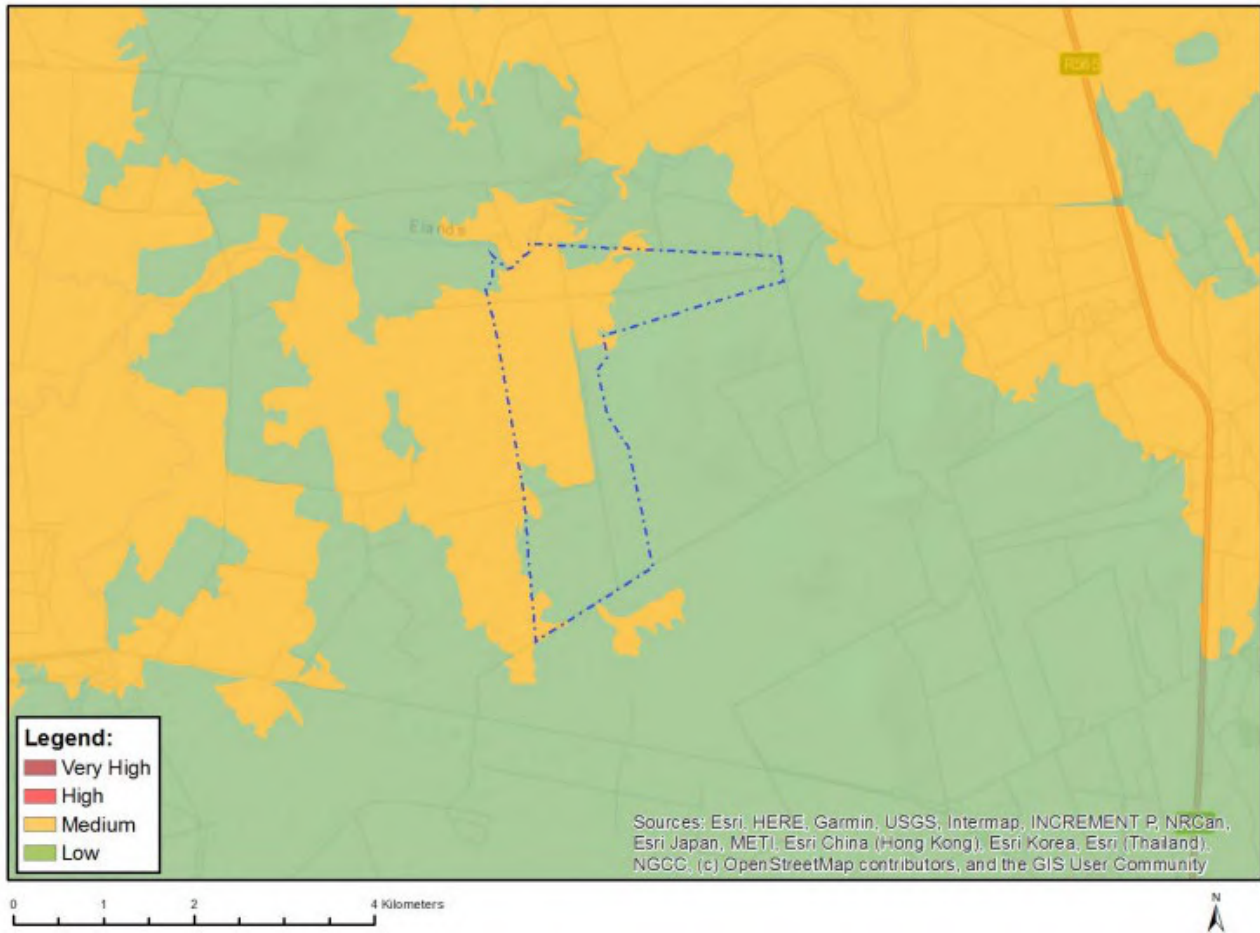


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Mammalia-Redunca fulvorufula fulvorufula
Low	Subject to confirmation
Medium	Aves-Podica senegalensis
Medium	Aves-Hydroprogne caspia
Medium	Aves-Aquila rapax
Medium	Sensitive species 5
Medium	Mammalia-Crocidura maquassiensis
Medium	Mammalia-Dasymys robertsii
Medium	Mammalia-Lycaon pictus
Medium	Reptilia-Kinixys lobatsiana

Figure 58: Animal species theme, National Web based Environmental Screening Tool.



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity
Medium	Cullen holubii

Figure 59: Plant Theme Sensitivity, National Web based Environmental Screening Tool.

11.5.5 Impact Assessment

Refer to **Section 13.13** below for the results from the impact assessment from this study.

11.5.6 Conclusions

Nine habitat units were identified during the assessment and included Wetland, Riparian and Drainage areas, Open savanna, Natural Savanna, Mountain Bushveld, Old Lands, Transformed, and Degraded areas. The Old lands, Open savanna and closed savanna habitats are of medium terrestrial sensitivity, as the area still provides habitat to various fauna and flora species, while the transformed habitat is considered to have a low sensitivity. The Mountain Bushveld habitat is considered high sensitivity due to the CBA classification and the presence of large, protected tree species.

Two layout alternatives are considered for the proposed project, (Alternative 1 and Alternative 2). Both alternatives are considered to have a moderate to low negative impact on the terrestrial ecosystem associated with the project area after implementation of mitigation measures;

1. The assessment area possesses a moderate diversity and density flora species, which is well represented in the general area. Moreover, fauna is ubiquitous within the assessment area and surrounding landscape.
2. This area has a sensitive CBA 2 area with protected trees which cannot be relocated or re-planted as these will not survive.

Alternative 2 is, however, the preferred layout alternative due to the following:

- It excludes the high sensitivity areas in alternative 1; and
- All areas indicated by the database as CBA2 will be excluded from development.

11.6 Avifaunal Baseline and Impact Assessment

A summary of the Avifaunal Baseline and Impact Assessment (Husted, 2023) follows. The specialist report is contained in **Appendix E3**.

11.6.1 *Details of the Specialist*

The details of the specialists that undertook the Avifaunal Baseline and Impact Assessment follow.

Organisation:	The Biodiversity Company &	
Name:	A. Husted	L. Steyn
Qualifications:	MSc Aquatic Health	PhD Biodiversity and Conservation
Affiliation (if applicable):	SACNASP Professional Natural Scientist (Registration No.: 400213/11)	

11.6.2 *Objectives of the Study*

The objectives of this study include the following:

- Describe the baseline avifaunal community;
- Identify present or potentially occurring SCC;
- Undertake an avifaunal sensitivity assessment and prepare an avifaunal sensitivity map; and
- Assess impacts to avifauna associated with the Project and recommend suitable mitigation measures.

11.6.3 *Methodology*

The assessment included the following tasks (amongst others):

- Various sources were reviewed as part of the desktop assessment and for compiling the expected species list; and
- Fieldwork involved two, two-day field trips, the first being 5th to the 8th of January 2023 and from the 13th to 16th of March 2023. Sampling consisted of standardized point counts as well as random diurnal incidental surveys.

Refer to Section 3 of the Specialist's report for a detailed breakdown of the methods used.

11.6.4 *Key Findings of the Study*

11.6.4.1 Habitat Types

Fine-scale habitats within the landscape are important in supporting a diverse avifauna community as they provide differing nesting, foraging and reproductive opportunities. Four different habitat types were delineated within the PAOI, comprising of Drainage Line, Thorny Bushveld, Old Fields and Modified Areas (see **Figure 60** below).

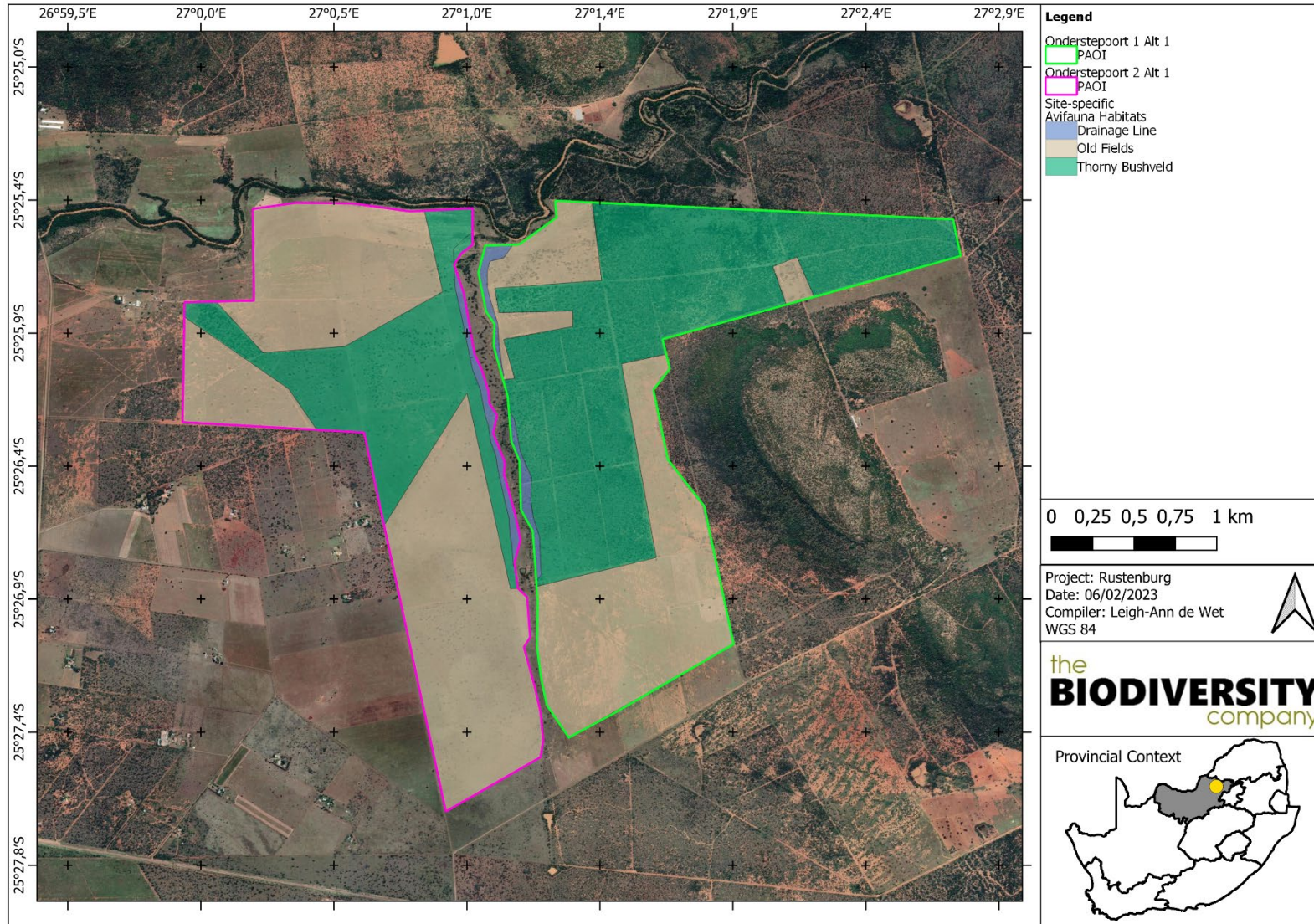


Figure 60: Avifauna habitats identified in the Project Area (Husted, 2023)

The majority of the PAOI comprised of thorny bushveld with a distinct woody component comprising of large trees. This habitat type is regarded as semi-natural, but slightly disturbed due to the grazing by livestock, mismanagement and also human infringement. This habitat supported a large number of avifauna species that were recorded during the field survey. It also provided nesting sites, especially the thorn trees found in this area which were extensively utilised by the avifauna species.

Old fields comprised large areas of open grasslands with few scattered shrubs. This provides open areas for foraging for species that spend time in the open, as well as for seed eaters which feed on the grass seeds. These open areas are open due to past agricultural practices and the fields are now left fallow.

The water resources found in the PAOI consisted of standing and running water in the drainage line which did not create enough of a water body for the usual large waterbirds such as ducks and waders, however, it does form a water resource for several avifauna species. Species making use of this area include *Oriolus larvatus* (Black-headed Oriole), *Halcyon albiventris* (Brown-hooded Kingfisher), *Centropus burchellii* (Burchell's Coucal), *Batis molitor* (Chinspot Batis), *Muscicapa striata* (Spotted Flycatcher), and *Halcyon senegalensis* (Woodland Kingfisher).

The Modified Area consisted primarily of urban development and existing electricity infrastructure and roads). These areas were mostly void of avifauna species, with the species recorded here being those resilient to disturbance.

11.6.4.2 Species of Conservation Concern

During the first assessment performed in the summer (5th to the 8th of January 2023) 119 species were recorded during the point counts and 39 during the incidental counts. Some species were observed both as incidental records and during the point counts. The total number of individual species accounts for approximately 30% of the total number of expected species. Avifauna communities within arid and semi-arid regions exhibit temporal movements in response to shifts in resource availability resulting in changes in species numbers.

One of the expected SCC was recorded (**Table 18**) within the PAOI during the survey period either within point counts or an incidental sightings i.e., *Sagittarius serpentarius* (Secretarybird).

Table 18: Summary of the avifauna species of conservation concern recorded within the proposed Rustenburg PV PAOI during the field survey (Husted, 2023)

Common Name	Scientific Name	Conservation Status Red List (Regional)*	Conservation Status Red List (Global)+
Secretarybird	<i>Sagittarius serpentarius</i>	VU	EN

Key: Status: VU = Vulnerable; EN = Endangered; LC = Least Concern; NT = Near Threatened.

*(Taylor *et al.* 2015), + (IUCN 2021)

'Priority Species' are considered threatened, rare or prone to impacts from energy development (Ralston Paton *et al.*, 2017). TBC has defined Risk Species as those species that are listed in Ralston Paton *et al.* (2017) as Priority Species, as well as those listed in the Eskom poster of Birds

and Power Lines (Eskom and EWT, no date) which together include all species, common or red-listed that may be at risk of collision, electrocution or habitat loss as a result of the proposed activity. Seventeen (17) of the species observed within the PAOI are regarded as priority species (see **Table 19 and 20 below**).

Table 19: Summary of Priority Species recorded within and around the proposed PAOI – First Survey (Husted, 2023)

Scientific Name	Common Name	Collisions	Electrocutions	Habitats Loss
<i>Accipiter melanoleucus</i>	Black Sparrowhawk	X		
<i>Afrotis afraoides</i>	Northern Black Korhaan	X	X	
<i>Alopochen aegyptiaca</i>	Egyptian Goose	X	X	
<i>Aquila spilogaster</i>	African Hawk Eagle	X		
<i>Ardea melanocephala</i>	Black-headed Heron	X	X	
<i>Buteo rufofuscus</i>	Jackal Buzzard	X	X	
<i>Circaetus cinereus</i>	Brown Snake Eagle	X	X	
<i>Circaetus pectoralis</i>	Black-chested Snake Eagle	X	X	
<i>Elanus caeruleus</i>	Black-winged Kite	X		
<i>Falco naumanni</i>	Lesser Kestrel	X		
<i>Falco rupicoloides</i>	Greater Kestrel	X		
<i>Haliaeetus vocifer</i>	African Fish Eagle	X	X	
<i>Lophotis ruficrista</i>	Red-crested Korhaan	X	X	
<i>Micronisus gabar</i>	Gabar Goshawk	X		
<i>Mirafra cheniana</i>	Melodious Lark	X		
<i>Plectropterus gambensis</i>	Spur-winged Goose	X	X	
<i>Sagittarius serpentarius</i>	Secretarybird	X	X	

Table 20: Summary of Priority Species recorded within and around the proposed PAOI – Second Survey (Husted, 2023)

Scientific Name	Common Name	Collisions	Electrocutions	Habitats Loss
<i>Accipiter minullus</i>	Little Sparrowhawk	X		
<i>Afrotis afraoides</i>	Northern Black Korhaan	X	X	
<i>Alopochen aegyptiaca</i>	Egyptian Goose	X	X	
<i>Ardea melanocephala</i>	Black-headed Heron	X	X	
<i>Bubulcus ibis</i>	Western Cattle Egret	X		
<i>Circaetus pectoralis</i>	Black-chested Snake Eagle	X	X	
<i>Elanus caeruleus</i>	Black-winged Kite	X		
<i>Falco amurensis</i>	Amur Falcon	X		
<i>Falco naumanni</i>	Lesser Kestrel	X		
<i>Hieraaetus wahlbergi</i>	Wahlberg's Eagle	X	X	

<i>Lophotis ruficrista</i>	Red-crested Korhaan	X	X	
<i>Melierax canorus</i>	Pale Chanting Goshawk	X		
<i>Micronisus gabar</i>	Gabar Goshawk	X		
<i>Sagittarius serpentarius</i>	Secretarybird			X
<i>Tachybaptus ruficollis</i>	Little Grebe	X		

11.6.4.3 Sensitivity Assessment

Desktop-based Sensitivity: Screening Tool

The terrestrial biodiversity theme sensitivity as indicated by the screening tool report for the project area of influence was derived to be ‘Very High’ for the entirety of the site due to its location within a CBA2, ESA1 and ESA2 as well as within a NPAES Focus Area (**Figure 61**).

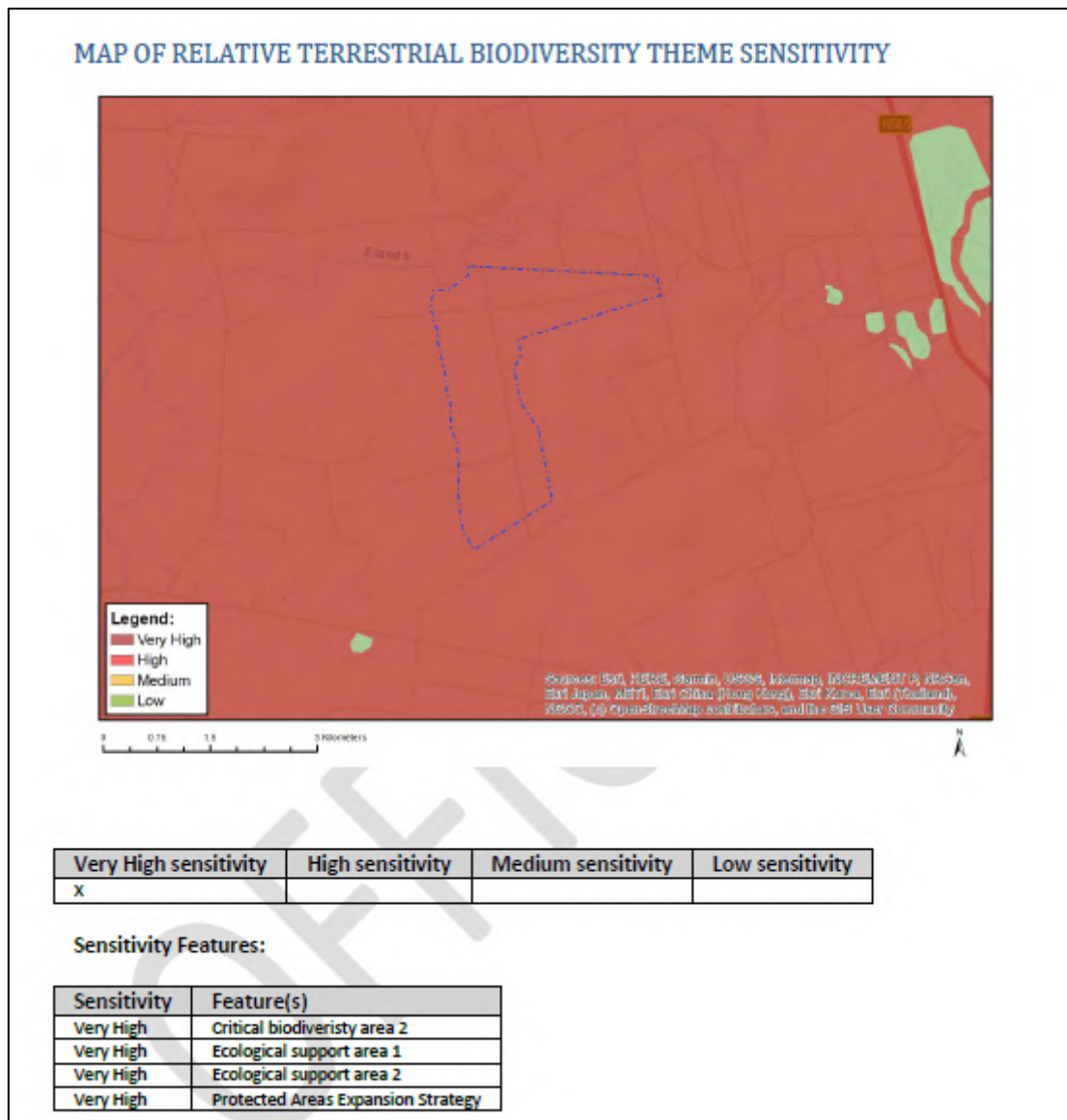


Figure 61: Screening Tool Terrestrial Biodiversity Theme sensitivity map

The Animal Species Theme sensitivity (see **Figure 62**), as indicated in the screening report, was derived to be ‘High’ for the PAOI. The High sensitivity for a portion of the project area was due to the likely presence of *Podica senegalensis* (African Finfoot) and a ‘Medium’ sensitivity for the remainder of the site due to the probable presence of *Aquila rapax* (Tawny Eagle).

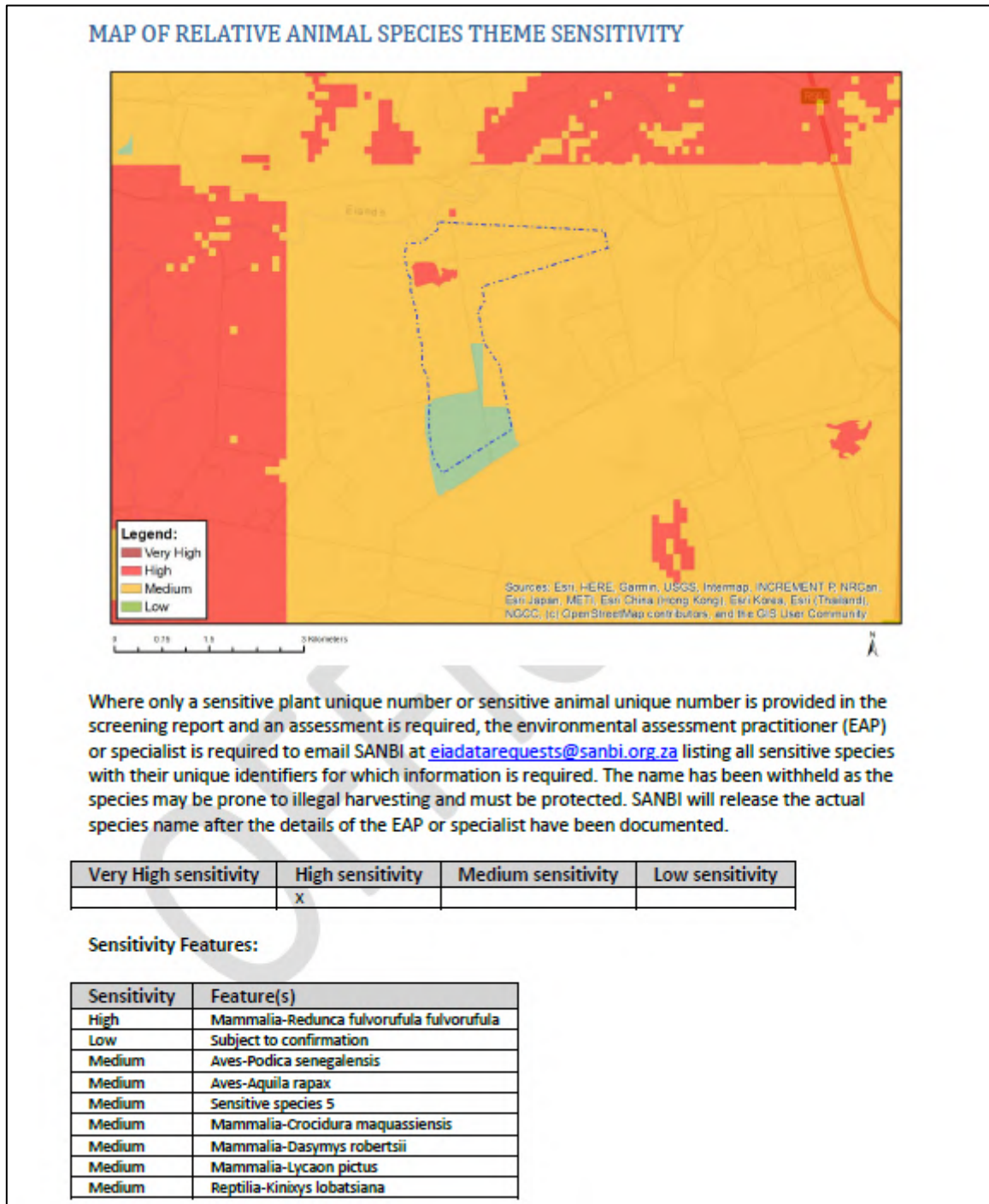


Figure 62: Screening Tool Animal Species Theme sensitivity map

Site-based Sensitivity Assessment

All habitats within the assessment area of the proposed project were allocated a sensitivity or SEI category (**Table 21**). The SEI of the PAOI within an avifauna context was based on both the field

results and desktop information. The SEI of the habitat types delineated are illustrated in **Figure 63**. The drainage line was given a high rating based on high likelihood of the water sources supporting SCCs. Only one SCC was recorded from the site but a high diversity of species in the thorny bushveld so the thorny bushveld was assigned a medium SEI and the old fields a low SEI. This habitat does however still have a high potential of supporting other SCCs.

Table 21: SEI Summary of habitat types delineated within field assessment area of PAOI (Husted, 2023)

Habitat	Conservation Importance	Functional Integrity	Biodiversity Importance	Receptor Resilience	Site Ecological Importance
Drainage Line	Medium	High	Medium	Low	High
	> 50% of receptor contains natural habitat with potential to support SCC.	Only minor current negative ecological impacts with no signs of major past disturbance and good rehabilitation potential.		Habitat that is unlikely to be able to recover fully after a relatively long period: > 15 years required to restore ~ less than 50% of the original species composition and functionality of the receptor	
Woody Thornveld	Medium	Medium	Medium	Medium	Medium
	> 50% of receptor contains natural habitat with potential to support SCC.	Mostly minor current negative ecological impacts with some major impacts and a few signs of minor past disturbance. Moderate rehabilitation potential.		Will recover slowly (~ more than 10 years) to restore > 75% of the original species composition and functionality of the receptor	
Old Fields	High	Low	Medium	High	Low
	Confirmed or highly likely occurrence of CR, EN, VU species that have a global EOO of > 10 km ² .	Several minor and major current negative ecological impacts.		Habitat that can recover relatively quickly (~ 5–10 years) to restore > 75% of the original species composition and functionality of the receptor	
Modified	Very Low	Very Low	Very Low	Very High	Very Low

Habitat	Conservation Importance	Functional Integrity	Biodiversity Importance	Receptor Resilience	Site Ecological Importance
	<p>No confirmed and highly unlikely populations of SCC.</p> <p>No confirmed and highly unlikely populations of range-restricted species.</p> <p>No natural habitat remaining.</p>	<p>Several major current negative ecological impacts.</p>		<p>Habitat that can recover rapidly</p>	

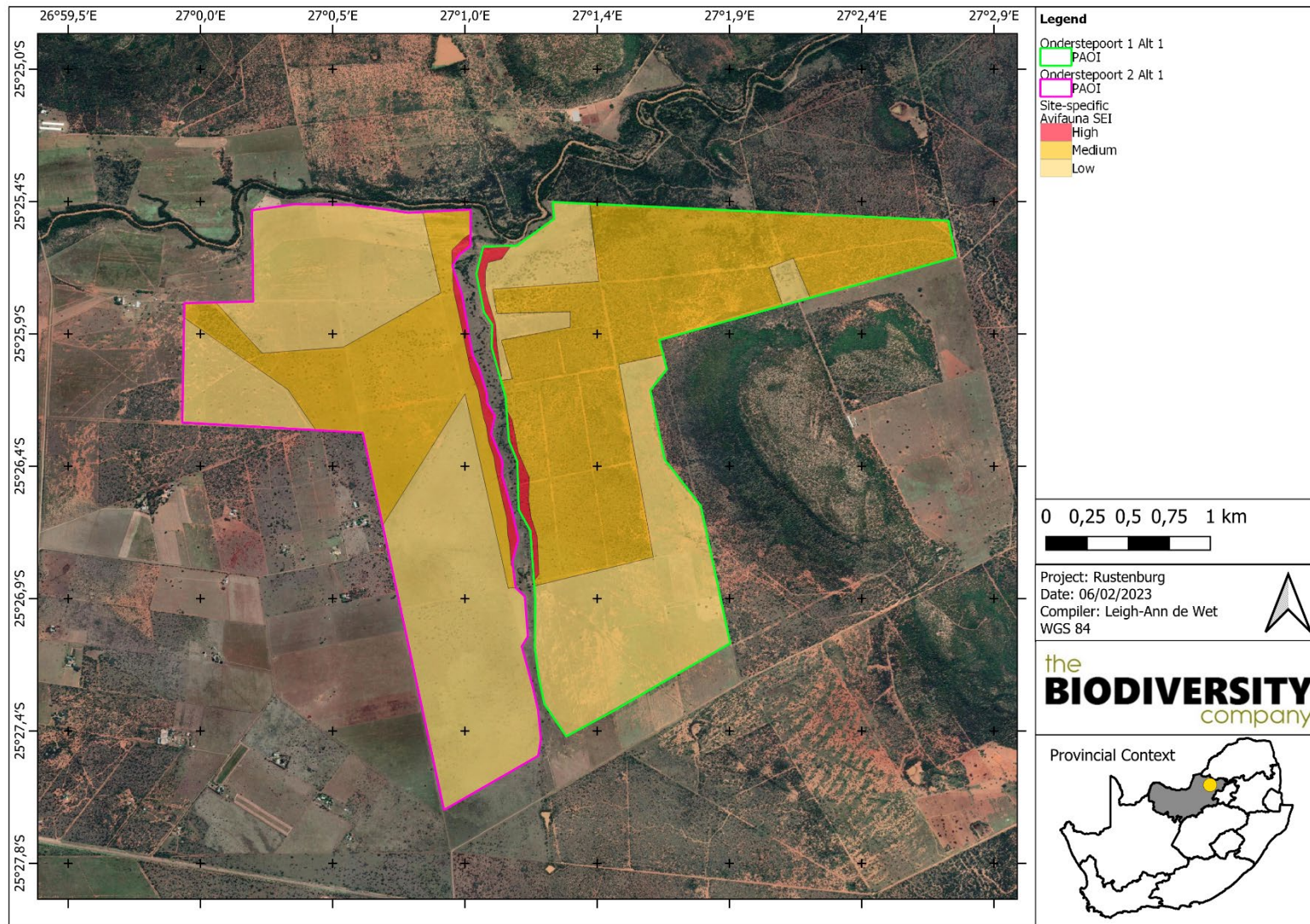


Figure 63: Map illustrating the Site Ecological Importance of the proposed PAOI within an avifauna context (Husted, 2023)

11.6.5 *Impact Assessment*

Refer to **Section 13.14** below for the results from the impact assessment from this study.

11.6.6 *Conclusions*

During the first assessment performed in the wet season (5th – 8th of January 2023) 119 species were recorded during the point counts. One of the species recorded were SCC i.e., *Sagittarius serpentarius* (Secretarybird). During the second assessment performed in the summer (13th to the 16th of March 2023) 110 species were recorded during the point counts. One of the species recorded during incidental sightings were SCC i.e., *Sagittarius serpentarius* (Secretarybird) Seventeen (17) risk species were recorded in the first survey, and sixteen (16) in the second survey. These are species at risk for collisions, electrocutions or sensitive to habitat loss.

The SEI of the Onderstepoort 1 PAOI of both alternatives was found to be medium and low, with current impacts identified as roads and fences and associated infrastructure as well as cattle grazing and agriculture. Impacts were identified as being Moderately High to Moderate in the Construction Phase, most of which could be reduced to Moderate to Low, and even Absent with the application of mitigation measures. Impacts in the operational phase are expected to be Moderately High to Moderate and can be reduced to Moderate to Low with mitigation measures. Decommissioning phase impacts are expected to be Moderately High to Moderate and can be reduced to Low with mitigation measures. Cumulative impacts are Moderate for the project in isolation but Moderately High for the project in consideration of the entire cluster.

Management measures include ensuring the construction footprint is kept small and industry-standard mitigations are put into place for solar panels, fencing and electrical infrastructure among other measures.

The main expected impacts of the proposed PV and associated infrastructure will include the following:

- Habitat loss and fragmentation;
- Electrocutions; and
- Collisions.

Mitigation measures as described in this report can be implemented to reduce the significance of the risk to an acceptable residual risk level. Considering the above-mentioned information, it is the opinion of the specialist that the project may be favourably considered, on condition that all the mitigation and recommendations provided in this report and other specialist reports are implemented. As impacts of both alternatives are the same, the preferred alternative: Alternative 2 is considered appropriate.

11.7 **Agricultural Impact Assessment**

A summary of the Agricultural Impact Assessment (Gouws, 2023) (contained in **Appendix E4**) follows.

11.7.1 *Details of the Specialist*

The details of the specialist that undertook the Agricultural Impact Assessment follow.

Organisation:	Index
Name:	Dr A. Gouws

Qualifications:	PhD Integrated Land Use Modelling
Affiliation (if applicable):	<ul style="list-style-type: none"> ▪ Council of Natural Sciences.No:400036/93, Category: Agricultural sciences. ▪ Member of the Soil Science Society of South Africa

11.7.2 Objectives of the Study

The objectives of the Agricultural Assessment: Compliance Statement include the following:

- Check the agricultural sensitivity of the overall site;
- Assess agricultural impacts of the proposed layout (development footprint);
- Assist with responding to any study-related comments that may be raised during the environmental assessment;
- Identify the preferred alternative in terms of the PV sites; and
- Adhere to the Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Section 24(5) (a) and (h) and 44 of NEMA (“the Protocols”) promulgated in GN No. 320 of 20 March 2020.

11.7.3 Methodology

A site sensitivity verification which is the review of existing information on soils and topography on a desktop level to determine areas with high sensitivity in terms of Notice 320 of the National Environmental Management Act in May 2020 of the Department of Forestry, Fisheries and the Environment (DFFE).

The results of this study followed a site visit on 4 April 2023. Satellite images were used as backdrop and the present land uses digitised. A number of soil profiles were assessed by using a soil augur or soil probe. Satellite images were used as backdrop and the present land uses digitised. Soil profiles were augured to determine soil depth, clay content is land conditions. The Capability classification is according to the guidelines published on the AGIS website of the National Department of Agriculture (NDA) was used to determine the capability of soils and their agricultural potential (DALRRD, 2019).

11.7.4 Key Findings of the Study

11.7.4.1 Land Use Capability

Land capability classes are interpretive groupings of land with similar potential and limitations or similar hazards. Land capability involves consideration of difficulties in land use owing to physical land characteristics, climate and the risks of land damage from erosion and other causes.

The classic eight-class land capability system (Klingebiel & Montgomery, 1961) was adapted for use by the South African Department of Agriculture in their Agriculture Geographic Information System (AGIS). According to Klingebiel *et al*, the soil capability is Class v and lower, mainly because of soil properties. Using the same criteria as AGIS, the farm is Class 7 (or Class iv or v according to Montgomery *et al*) or poorer, which has moderate/low sensitivity. The environmental sensitivity according to the tool is indicated as high and moderately sensitive. However, this is not the case; while much of the land has moderately deep soils with a high soil potential, the erratic and low rainfall and high summer temperatures reduces the land use capability to medium/low.

11.7.4.2 Grazing Capacity

The land in its natural state is bushveld with highly palatable grass species. The farmers over time removed much of the Acacia trees to improve the veld for livestock. The grazing capacity according to DALRRD is estimated at 10ha/large livestock unit (LSU). The carrying capacity for the PV site is approximately 40 LSU.

11.7.4.3 Agricultural Sensitivity – Screening Tool

According to the screening tool, the site has a high sensitivity for farming. A detailed assessment found that the climatic conditions and crop yield are such that profitable crop farming is not possible.

11.7.5 Impact Assessment

Refer to **Section 13.15** below for the results from the impact assessment from this study.

11.7.6 Conclusions

The screening tool evaluation in the case of this property is incorrect. The fields indicated were never planted with crops, but in order to improve the veld grazing, it was de-bushed and planted to pastures. There is no land that can be considered as high potential land, this is mainly due to the adverse climatic conditions that makes rainfed crop production unprofitable. As a result, the land was found to be moderately sensitive regarding rainfed crop farming and not highly sensitive as indicated by the screening tool. There is also no irrigated land that should be protected. The livestock carrying capacity at a stocking density of 10ha/LSU, is approximately 44 LSU (medium frame animals in a weaner production system). The projected enterprise income is R 310 332 or R25 861/month. The impact of the development on farming as an enterprise is low on a regional or national scale. It is also temporary and will be for the medium term or for the lifespan of the project. The cattle handling facilities located on the land proposed for the development will be moved to a new position on the remaining portion. In conclusion, no agricultural infrastructure will be lost. The soil is well-drained with moderately developed structure. It is also on evenly sloped land where erosion is not expected. Nevertheless, the PV projects create areas that are cleared of vegetation, and that could be subject to erosion. Runoff from hard surfaces should be dealt with by a Stormwater Management Plan. No impact is expected, but mitigation can be achieved by allowing grass to re-establish under the PV panels after construction.

11.8 Phase 1 Cultural Heritage Impact Assessment

A summary of the Phase 1 Cultural Heritage Impact Assessment (Kitto, 2023) (contained in **Appendix E5**) follows.

11.8.1 Details of the Specialist

The details of the specialist that undertook the Phase 1 Cultural Heritage Impact Assessment follow.

Organisation:	Nitai Consulting
Name:	Jennifer Kitto
Qualifications:	BA Archaeology and Social Anthropology; BA (Hons) Social Anthropology

No. of years' experience:	24
Affiliation (if applicable):	Association of Southern African Professional Archaeologists (ASAPA) - Technical member No.444

11.8.2 *Objectives of the Study*

The objectives of this study included the following:

- Evaluate the potential impacts of construction, operation and maintenance of the proposed development on archaeological, cultural and historical resources;
- Recommend mitigation measures to ameliorate any negative impacts on areas of archaeological, cultural or historical importance; and
- Provide guideline measures to manage any impacts that might occur during the proposed project's construction and implementation phases.

11.8.3 *Methodology*

The methodology employed during this study consisted of the following:

- A survey of the relevant literature was conducted with the aim of reviewing the previous research done and determining the potential of the area. In this regard, various anthropological, archaeological and historical sources were consulted;
- A survey of Heritage Impact Assessments for projects in the region by various heritage consultants was conducted with the aim of determining the heritage potential of the area;
- The Heritage Atlas Database, various SAHRA databases, the Environmental Potential Atlas, the Chief Surveyor General and the National Archives of SA were consulted. Database surveys produced a number of sites located in the larger region of the proposed development; and
- Aerial photographs, topocadastral and other maps were also studied.

11.8.4 *Key Findings of the Study*

11.8.4.1 Archaeological and Cultural Heritage Sensitivity - Screening Tool

The DFFE Environmental Screening Tool was accessed for information on the cultural-heritage sensitivity of the general region. This tool indicated that the Archaeological and Cultural Heritage Sensitivity of the general region is Low with several points of High sensitivity in the area north of the project footprint (see **Figure 64 and 65** below).

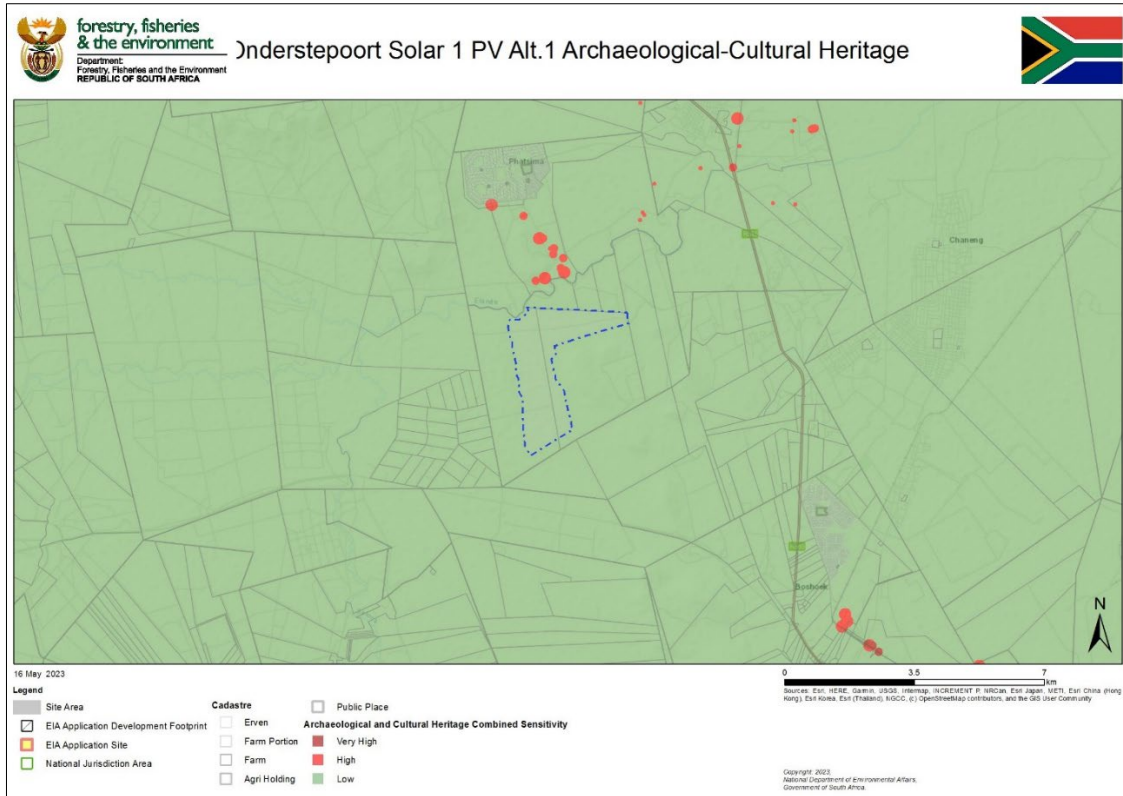


Figure 64: Sensitivity for archaeological and cultural heritage themes in the Project Area (Alternative 1) according to Screening Tool (Kitto, 2023)

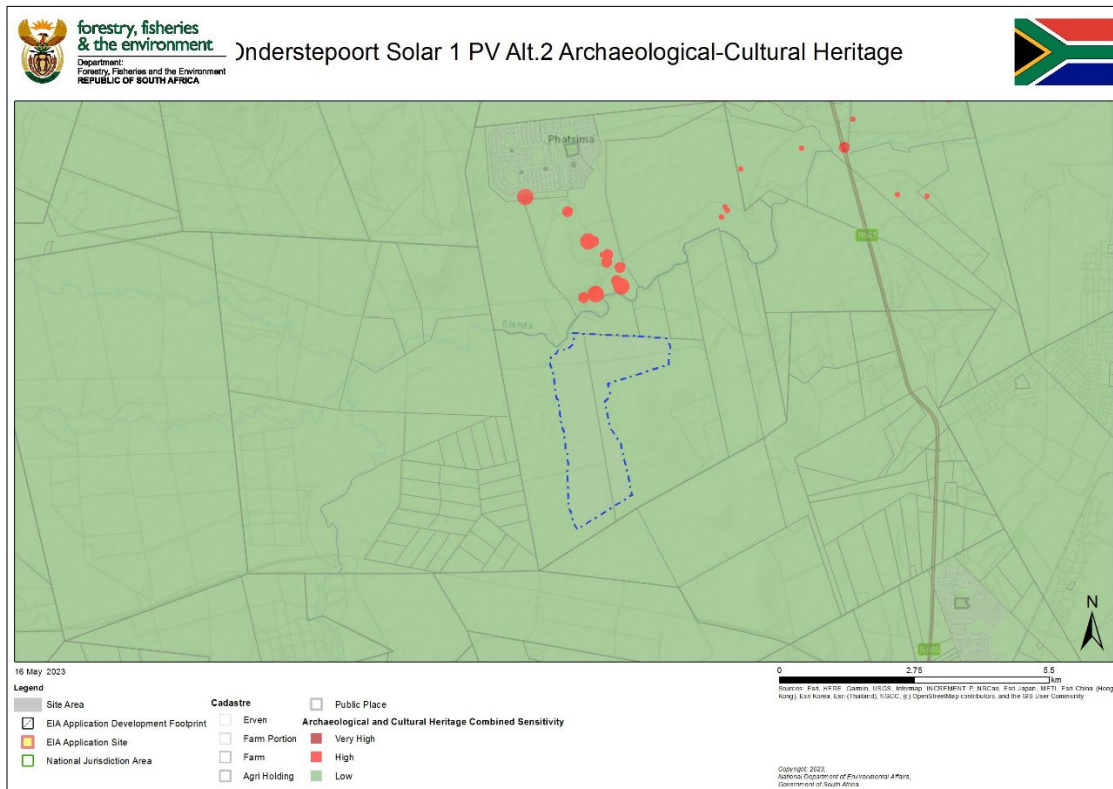


Figure 65: Sensitivity for archaeological and cultural heritage themes in the Project Area (Alternative 2) according to Screening Tool (Kitto, 2023)

11.8.4.2 Survey Results

The survey aimed to find and identify archaeological and other heritage resources such as burial grounds and graves (BGG), archaeological material or sites, historic built environment and landscape features of cultural heritage significance. The field survey identified no visible heritage resources within or adjacent to the project footprint.

11.8.5 *Impact Assessment*

Refer to **Section 13.16** below for the results from the impact assessment from this study.

11.8.6 *Conclusions*

No heritage resources were identified within or adjacent to the proposed Onderstepoort Solar 1 PV project footprint area during the site survey. Therefore, low impacts on heritage resources are anticipated for both the Alternative 1 and Alternative 2 layout.

The impact significance of the project on graves and cemeteries is low as no definite grave sites were identified. However, there is a possibility that unidentified graves could be uncovered by site clearance or construction activities.

The impact significance of the proposed project on protected historical structures is low as no historical structures or structure remains were identified.

The impact significance of the proposed project on archaeological resources is low as no archaeological sites or material were identified. However, there is a possibility that unidentified graves could be uncovered by site clearance or construction activities.

Should any unidentified heritage resources be uncovered during site clearance or construction activities, the general management guidelines in Section 12 would apply.

Both the National Environmental Screening tool and the SAHRIS Palaeontological Sensitivity Map indicate that the project footprint (Alternative 1 and Alternative 2) is located within an area where the underlying geology is of High and Medium sensitivity for the occurrence of fossils. Therefore, a separate palaeontological assessment has been undertaken to indicate if significant/sensitive fossils will be impacted by the proposed project and provide mitigation measures.

No fatal flaws were identified during this study, therefore, it is the considered opinion of the heritage specialist that the construction of the proposed Onderstepoort Solar 1 PV project within the proposed footprint can proceed. There are no objections from a heritage perspective provided the recommendations and mitigation measures contained in this report are implemented where necessary. From a heritage perspective, there is no preferred option between the Alternative 1 and Alternative 2 layouts.

11.9 Palaeontological Impact Assessment

A summary of the Palaeontological Impact Assessment (Butler, 2023) (contained in **Appendix E6**) follows.

11.9.1 *Details of the Specialist*

The details of the specialist that undertook the Palaeontological Impact Assessment follow.

Organisation:	Banzai Environmental
Name:	E. Butler
Qualifications:	MSc Zoology (specializing in Palaeontology)
Affiliation (if applicable):	Member of the Palaeontological Society of South Africa (PSSA)

11.9.2 *Objectives of the Study*

The general objectives of a Palaeontological Impact Assessment include the following:

- To identify the palaeontological importance of the rock formations in the footprint;
- To evaluate the palaeontological magnitude of the formations;
- To clarify the impact on fossil heritage; and
- To suggest how the developer might protect and lessen possible damage to fossil heritage.

11.9.3 *Methodology*

The following sources were reviewed as part of this study:

- Geological map 1:100 000, Geology of the Republic of South Africa (Visser 1984)
- A Google Earth map with polygons of the proposed development was obtained from Nemaï Environmental.
- 1:250 000 Rustenburg 2526 (1981) Geological Map (Council for Geosciences, Pretoria)
- Updated geological shape files (Council for Geosciences, Pretoria)
- National Environmental Web-based Screening Tool

11.9.4 *Key Findings of the Study*

Based on the desktop research it is concluded that fossil heritage of scientific and conservational interest in the development footprint is rare. This is in contrast with the High Sensitivity allocated to the development area by the SAHRIS Palaeosensitivity Map and DFFE Screening Tool

11.9.5 *Impact Assessment*

Refer to **Section 13.13** below for the results from the impact assessment from this study.

11.9.6 *Conclusions*

A medium Palaeontological Significance has been allocated for the construction phase of the PV development pre-mitigation and a low significance post mitigation. The construction phase will be the only development phase impacting Palaeontological Heritage and no significant impacts are expected to impact the Operational and Decommissioning phases.

11.10 Visual Impact Assessment

A summary of the Visual Impact Assessment (Buys, 2023) (contained in **Appendix E8**) follows.

11.10.1 *Details of the Specialist*

The details of the specialist that undertook the Visual Impact Assessment follow.

Organisation:	Environmental Assurance (Pty) Ltd	
Name:	Andre Buys	Richard Viljoen
Qualifications:	M.Sc. Environmental Science	M.Sc. Environmental Science
Affiliation (if applicable):	SACNASP (Pr. Sci. Nat.) 119183	-

11.10.2 *Objectives of the Study*

The scope of work for the Visual Impact Assessment included the following:

- Describing the existing visual characteristics of the proposed site and its environment;
- Viewshed and viewing distance determination using Geographic Information System (GIS) analysis up to 15 km from the proposed structures;
- Visual Exposure Analysis, comprising the following aspects;
- Identifying the preferred alternative in terms of the two powerline route options;
- Impact identification and ratings; and
- Mitigation of identified visual impacts.

11.10.3 *Methodology*

An initial desktop site assessment was conducted to determine suitable locations regarding the visual impact assessment. The result of the desktop study is the identification of areas or activities, which could possibly contribute to the deterioration of the visual characteristics of the area.

Site baseline characterisation (and subsequent fieldwork) occurred on the 24th of April 2023 for the visual assessment. The site baseline characterisation was conducted to undertake the visual assessment of the current characteristics of the receiving environment. The field survey included photographic evidence at the various viewpoints, which were used as a basis for determining the potential visual ability and visual impacts of the proposed development. Various viewpoints were identified based on the sensitivity and visual impact of the area.

The VIA was conducted following the methodology:

- Site visit and orientation.
- Describing the landscape character or visual baseline based on:
 - o Photographs of the project site and larger study area were taken during a field visit conducted on the 24th of April 2023.
- A review of available aerial photography and topographical maps, in relation to:
 - o Natural elements; and

- o Human-made elements.
- Determining the area/s where the project will be visible from.
- Determining the visual resource value of the landscape in terms of:
 - o The topographical character of the site and its surroundings and potential occurrence of landform features of interest;
 - o The presence of water bodies within the study area;
 - o The general nature and level of disturbance of existing vegetation cover within the study area; and
 - o The nature and level of human disturbance and transformation evident.
- Determine the visual absorption capacity of the receiving visual landscape.
- Determining the receptor sensitivity to the proposed project.
- Determine the magnitude of the impact, by considering the proposed project in terms of aspects of VIA, namely:
 - o Visibility.
 - o Visual intrusion; and
 - o Visual exposure.
- Assessing the impact significance by relating the magnitude of the visual impact to its:
 - o Duration.
 - o Severity; and
 - o Geographical extent.
- To recommend mitigation measures to reduce the potential visual impacts of the project.

11.10.4 Key Findings of the Study

11.10.4.1 Landcover VAC

According to Oberholzer (2008), Visual Absorption Capacity (VAC) can be defined as an 'estimation of the capacity of the landscape to absorb development without creating a significant change in visual character or producing a reduction in scenic quality'. VAC was determined by considering the nature and occurrence of vegetation cover, topographical characteristics, and human structures. A further major factor is the degree of visual contrast between the proposed new project and the existing elements in the landscape.

To account for the fact that visual impacts are expected to be more intrusive in landscapes with a lower VAC than in those with a higher VAC (regardless of the visual quality of the landscape), a weighting factor is incorporated into the impact magnitude determination.

Most of the vegetation cover is predominately dominated by grasses, shrubs and scattered trees, while the topographical characteristics (flat to gentle) which can conceivably result in a moderate VAC. The visual resource value of the study area has been determined to be moderate and the VAC of the study area has been rated as low. Therefore, a high (1.2) weighting factor in terms of VAC is applied during the impact assessment.

11.10.4.2 Visual Receptor Sensitivity and Incidences

Receptor sensitivity refers to the degree to which an activity will impact the receptors and depends on how many persons see the project, how frequently they are exposed to it and their perceptions regarding aesthetics. Receptors of the proposed project can be broadly categorised into two (2) main groups, namely:

- People who live or work in the area, and who will be frequently exposed to the project components (resident receptors); and
- People who travel through the area and are only temporarily exposed to the project components (transient receptors).

Resident receptors located outside the proposed site include:

- Resident receptors would include the employees of the agricultural activities, residents and the local farming communities that are present outside the proposed project area.

Transient receptors located outside the proposed site include:

- The un-named tar road from Boshhoek to Lindsley is the only main road located near the proposed site. The roads situated near the proposed site are predominately used for access to the surrounding areas, tourism attractions, residential areas, and agricultural activities. The proposed project area may potentially be visible from the tar road, while the visibility may be reduced due to vegetation obstructing the view from the roads at certain points. The visual receptor sensitivity and incidence can be classified as high, moderate or low.

Based on the receptor sensitivity assessment and the above criteria, a moderate weighting factor (1.0) in terms of this aspect is applied during the impact magnitude determination

11.10.4.3 Theoretical Visibility, Visual Intrusion, and Visual Exposure

Theoretical visibility was determined by conducting a Viewshed analysis and using Geographic Information System software with three-dimensional topographical modelling capabilities:

- The Digital Elevation Model (DEM) for the Viewshed analysis was acquired; and
- A 10 km area surrounding the site was used due to the topography of the area.

The Viewshed was modelled on the above-mentioned DEM and the layout plan supplied by Nemai Consulting, using Esri ArcGIS for Desktop software, 3D Analyst Extension. A viewshed was modelled to account for the PV facility and its associated infrastructure, that will be constructed (**Figure 66**).

Visual intrusion deals with how well the project components fit into the ecological and cultural aesthetic of the landscape. An object will have a greater negative impact on scenes considered to have a high visual quality than on scenes of low quality.

Given that the study area has a moderate VAC (due to vegetation and the flat to gentle landscape) and moderate visual resource value, the proposed project will have a moderate (without mitigation measures) visual intrusion on surrounding sensitive receptors. Ensuring that vegetation is retained on the periphery of these areas, and wherever possible, lights be directed downwards as to avoid illuminating the sky and limit the reflection from the solar panels, the visual impact on the surrounding environment will be moderate depending on the proximity to the sensitive receptors.

The altered visual environment during the construction and operational phases will lead to moderate (without mitigation measures) levels of visual intrusion, with moderate levels of compatibility with the surrounding land uses as well as moderate visual contrast. The level of visual intrusion because of the proposed project, with specific mention of vegetation clearing, removal of topsoil and solar PV infrastructure, is considered to be moderate (without mitigation measures) during the construction and operational phases, in line with the low VAC. The perceived visual impacts

associated with the construction and operational phases are moderately (without mitigation measures) intrusive to the receiving environment.

The visual impact of a development diminishes at an exponential rate as the distance between the observer and the object increases. The impact at 1 000 m would be 25% of the impact as viewed from 500 m. At 2 000 m it would be 10 % of the impact at 500 m. The inverse relationship of distance and visual impact has been an important component in visual analysis literature (Hull and Bishop, 1998).

For the purposes of this assessment, close-range views (equating to a high level of visual exposure) are views over a distance of 500 m or less, medium-range views (equating to a moderate level of visual exposure) are views of 500 m to 2 km, and long-range views are over distances greater than 2 km (low levels of visual exposure). Limited sensitive receptors are located within 2 km of the site and are limited to people working in the area, residents and the number of farms surrounding the site.

For the purposes of this assessment, visual exposure in terms of all identified impacts has therefore been rated as low as the majority of the high sensitivity, sensitive receptors, are located more than 5 km from the project site.

Results of the visual impact assessment indicated that from a visual perspective, the proposed project and related activities are the main project components that are expected to result in a visual impact. Receptors located within 2km of the proposed site will have the moderate (without mitigation) visual impact. Within a 5 km radius of the proposed project, residential areas and farming communities will have a low (without mitigation) visual impact. Beyond the 5 km study area, there are some areas where the development is discernible. However, the visual impacts are generally of moderate to low magnitude and impact. Local low and high-level vegetation will provide limited screening; however, the proposed solar PV facility and associated infrastructure can conceivably be visible to the sensitive receptors located near the proposed project boundary. The visual impacts associated with the Project and associated infrastructure will occur once construction has been completed and will be long term in nature.

In terms of the potential cumulative impacts, the proposed site is surrounded by various commercial and agricultural activities. In addition, according to the REEA Database, there are two (2) renewable energy applications have been made for properties located near the project site. Most of the proposed site currently grassland vegetation and the clearance and subsequent development of the site will result in the alteration of this space. Consequently, the development of this site will add cumulatively to the loss of sense of place. While the result in a change in the sense of place for those areas that look onto the project site, the magnitude of the impact is likely to be moderate as most of the sensitive receptors are located more than 2.5km from the project site (Desktop assessment).

Based on the results of the impact assessment, the majority of the potential visual impacts were considered to be moderate before mitigation and with the successful implementation this can be reduced to low. With regards to the proposed activities, due to the terrain of the proposed boundary, vegetation, VAC, and current land uses, the proposed activities are expected to result in a moderate visual impact on the receiving environment. The proposed activities will have a long-term temporal

visual impact, due to the very nature of the Project and associated infrastructure. The activity will have a localised visual impact over a long-term duration. The activity will be able to continue with the implementation of appropriate mitigation strategies during the construction, operational and decommissioning phases. Both the Alternative sites were accessed and were effectively calculated to pose the same level of impact

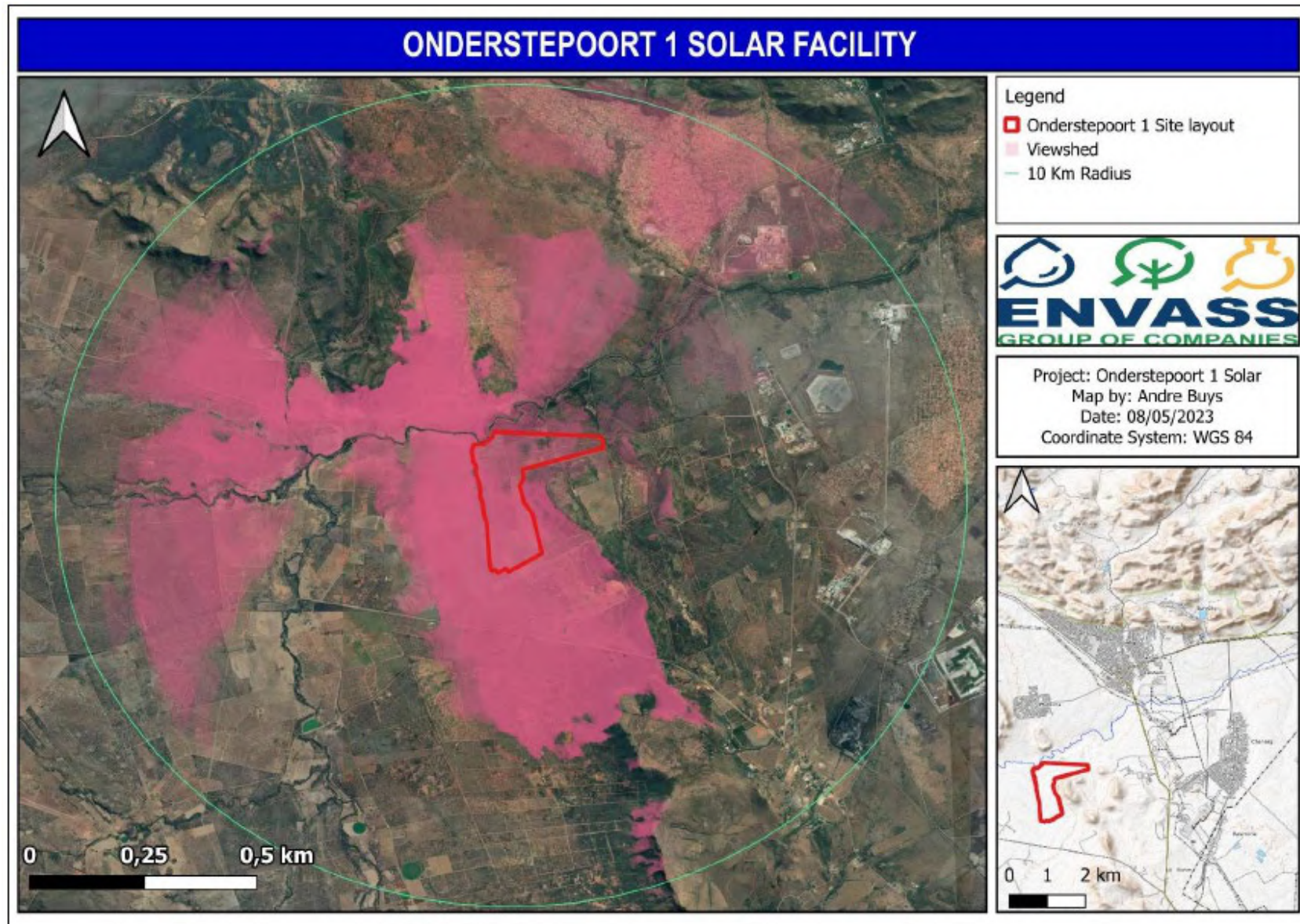


Figure 66: Viewshed analysis for the proposed project (Buys, 2023)

11.10.5 Impact Assessment

Refer to **Section 13.18** below for the results from the impact assessment from this study.

11.10.6 Conclusions

From the impact assessment results obtained, potential visual impacts may be present within the construction, operational and decommissioning phases. From the assessment, the proposed activities can conceivably have a moderate (without mitigation) visual impact on the surroundings and the natural and topographical environment.

Impacts are likely to be largely localised and within 5 km of the proposed project boundary, while significant visual impacts with regards to the proposed activities are expected at the sensitive receptors located within 2km of the proposed project boundary. It should be mentioned that an estimation of the impact distance is difficult to determine in terms of the visual impact assessment as it does not incorporate distractive views in the form of vegetation or land use (infrastructure, buildings, etc.), however, with successful mitigating implementation the significance can be reduced.

Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. Cumulative visual impacts resulting from landscape modifications as a result of the proposed activities in conjunction with other activities are likely to be of moderate significance, however, it can be reduced with the successful implementation of the proposed mitigation measures.

The project site and surrounding area can be characterized by residential, commercial, tourism, and agricultural activities. According to the REEA Database, there are two (2) renewable energy applications have been made for properties located near the project site. The proposed site ranges from approximately 1040m to 1065 metres above mean sea level (mamsl). predominantly flat, with slight hills and mountains located towards the North and North-east. The landscape is characterized a mix of natural grassland, open woodland, commercial annual crops (rain-fed / dry land) and Fallow land (old fields (bush), typically of the Central bushveld region of South Africa. The surrounding areas comprises with a mix of residential activities, agricultural, tourism and commercial activities. The vegetation in the area consists mainly of grasses, shrubs, and scattered trees.

Several potential risks to the receiving aesthetic and visual environment as a result of the proposed activities have been identified, relating to impacts on the visual character and sense of place, visual intrusion and visual exposure and visibility. The significance of these impacts may be reduced should appropriate and effective mitigation measures be implemented. The proposed Project and associated infrastructure can conceivably have a moderate impact on the visual environment, while secondary impacts, such as dust emission, solar glint and glare and lighting at night, will also manifest as visual disturbances from project initiation. The study area comprises of residential activities, agricultural and commercial activities which have had a visual impact on the natural environment. Therefore, the proposed project has been predicted to have a moderate impact before mitigation on the visual environment. After appropriate and effective mitigation measures the impact is rated as moderate to low. Both the alternative options have been assessed, and a similar finding and recommendation is reasonable for both Alternatives.

The proposed activities should therefore have a moderate to low visual impact on the receiving environment and is thus not fatally flawed from a visual impact perspective. Considering the project, it is the specialist's

opinion that the proposed activities be allowed, provided that the findings within this report are considered along with the recommendations made towards the management of the proposed activity. All recommendations should be included in the Environmental Management Programme (EMPr) relevant to the proposed project.

11.11 Traffic Impact Assessment

A summary of the Traffic (Transport) Impact Assessment (contained in **Appendix E7**) follows.

11.11.1 *Details of the Specialist*

The details of the specialist that undertook the Traffic Impact Assessment follow.

Organisation:	iWink Consulting
Name:	Iris Sigrid Wink
Qualifications:	Engineering Council of South Africa (ECSA) (Registration number 20110156)

11.11.2 *Objectives of the Study*

The key objectives of the Traffic Impact Assessment included the following:

- Assess activities related to traffic movement for the construction and operation (maintenance) phases of the facility.
- Recommend a preliminary route for the transportation of the components to the proposed site.
- Recommend a preliminary transportation route for the transportation of materials, equipment and people to site.
- Recommend alternative or secondary routes where possible.

General:

A specialist report prepared in terms of the Regulations must contain the following:

- (a) details of-
 - (i) the specialist who prepared the report; and
 - (ii) the expertise of that specialist to compile a specialist report including a curriculum vitae;
- (b) a declaration that the specialist is independent in a form as may be specified by the competent authority;
- (c) an indication of the scope of, and the purpose for which, the report was prepared;
 - (cA) an indication of the quality and age of base data used for the specialist report
 - (cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;
- (d) the duration date and season of the site investigation and the relevance of the season to the outcome of the assessment;
- (e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used;
- (f) 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;
- (g) an identification of any areas to be avoided, including buffers;
- (h) 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;
- (i) a description of any assumptions made and any uncertainties or gaps in knowledge;
- (j) a description of the findings and potential implications of such findings on the impact of the proposed activity or activities;
- (k) any mitigation measures for inclusion in the EMPr;
- (l) any conditions for inclusion in the environmental authorisation;

- (m) any monitoring requirements for inclusion in the EMPr or environmental authorisation;
 - (n) a reasoned opinion-
 - (i) whether the proposed activity, activities or portions thereof should be authorised; and (considering impacts and expected cumulative impacts).
 - (iA) regarding the acceptability of the proposed activity or activities, and
 - (ii) 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;
 - (o) a description of any consultation process that was undertaken during the course of preparing the specialist report;
 - (p) a summary and copies of any comments received during any consultation process and where applicable all responses thereto; and
 - (q) any other information requested by the competent authority.
- Specific:

- 1.1.1.1 Extent of the transport study and study area;
- 2.1.1.1 The proposed development;
- 3.1.1.1 Trip generation for the facility during construction and operation;
- 4.1.1.1 Traffic impact on external road network;
- 5.1.1.1 Accessibility and turning requirements;
- 6.1.1.1 National and local haulage routes;
- 7.1.1.1 Assessment of internal roads and site access;
- 8.1.1.1 Assessment of freight requirements and permitting needed for abnormal loads; and
- 9.1.1.1 Traffic accommodation during construction.

11.11.3 Methodology

The report deals with the traffic impact on the surrounding road network in the vicinity of the site:

- a) during the construction of the access roads;
- b) construction of the facility; and
- c) operation and maintenance during the operational phase.

This transport study was informed by the following:

Site Visit and Project Assessment

- d) Overview of project background information including location maps, component specs and any possible resulting abnormal loads to be transported.
- e) Research of all available documentation and information relevant to the proposed facility; and
- f) Site visit to gain sound understanding of the project.

The transport study considered and assessed the following:

Traffic and Haul Route Assessment

- g) Estimation of trip generation;
- h) Discussion on potential traffic impacts;
- i) Assessment of possible haul routes; and
- j) Construction and operational (maintenance) vehicle trips.

Site layout, Access Points and Internal Roads Assessment per Site

- k) Description of the surrounding road network;

- l) Description of site layout;
- m) Assessment of the proposed access points; and
- n) Assessment of the proposed internal roads on site.

11.11.4 Key Findings of the Study

The two closest ports of entry for imported components are the Port of Richards Bay and the Port of Durban, which were therefore taken into consideration.

The Port of Richards Bay is situated on the coast of KwaZulu-Natal and is a deep-sea water port boasting 13 berths. The terminal handles dry bulk ores, minerals and break-bulk consignments with a draft that easily accommodates Cape size and Panamax vessels. The Port is operated by Transnet National Ports Authority. The Port of Richards Bay is located approximately 790 km from the project site traveling via the N4, R50 and R34.

The Durban container terminal is one of the largest container terminals in the African continent and operates as two terminals Pier 1 and Pier 2. It is ideally located to serve as a hub for containerized cargo from the Indian Ocean Islands, Middle East, Far East and Australia. Various capacity creation projects are currently underway, including deepening of berths and operational optimization. The terminal currently handles 65% of South Africa's container volumes. (Transnet Port Terminals, n.d). The Port of Durban is located approximately 740 km via the N3 from the proposed project.

It is anticipated that elements manufactured within South Africa will be transported to the site from the Cape Town, Johannesburg and Pinetown/Durban areas. Components, such as PV panels, manufactured in Cape Town will be transported to site via road. Haulage vehicles will mainly travel on the national highway and the total distance to the proposed site is approximately 1480 kms via the N1. If components from Johannesburg are considered, the distance from the Johannesburg area to site is approximately 160 km via the R24 and N4.

Normal loads can transport elements via two potential routes from Durban and Pinetown to the site. No road limitations are envisaged along the route for normal load freight. The travel distance from Pinetown to the site via the N3 is approximately 720 km.

The proposed access road towards the site is shown in **Figure 67** and will cross Farm No. 571 and Portion 1 of Farm No. 102. Site vehicles will travel towards the project site on the R556 (located to the south). The R556 is a public road and surfaced when turning off the R565. It changes to a gravel road approximately 350 m before the turn-off onto the proposed access road towards Onderstepoort Solar 1. The access has been assessed in line with access spacing requirements, required sight lines and road safety considerations.

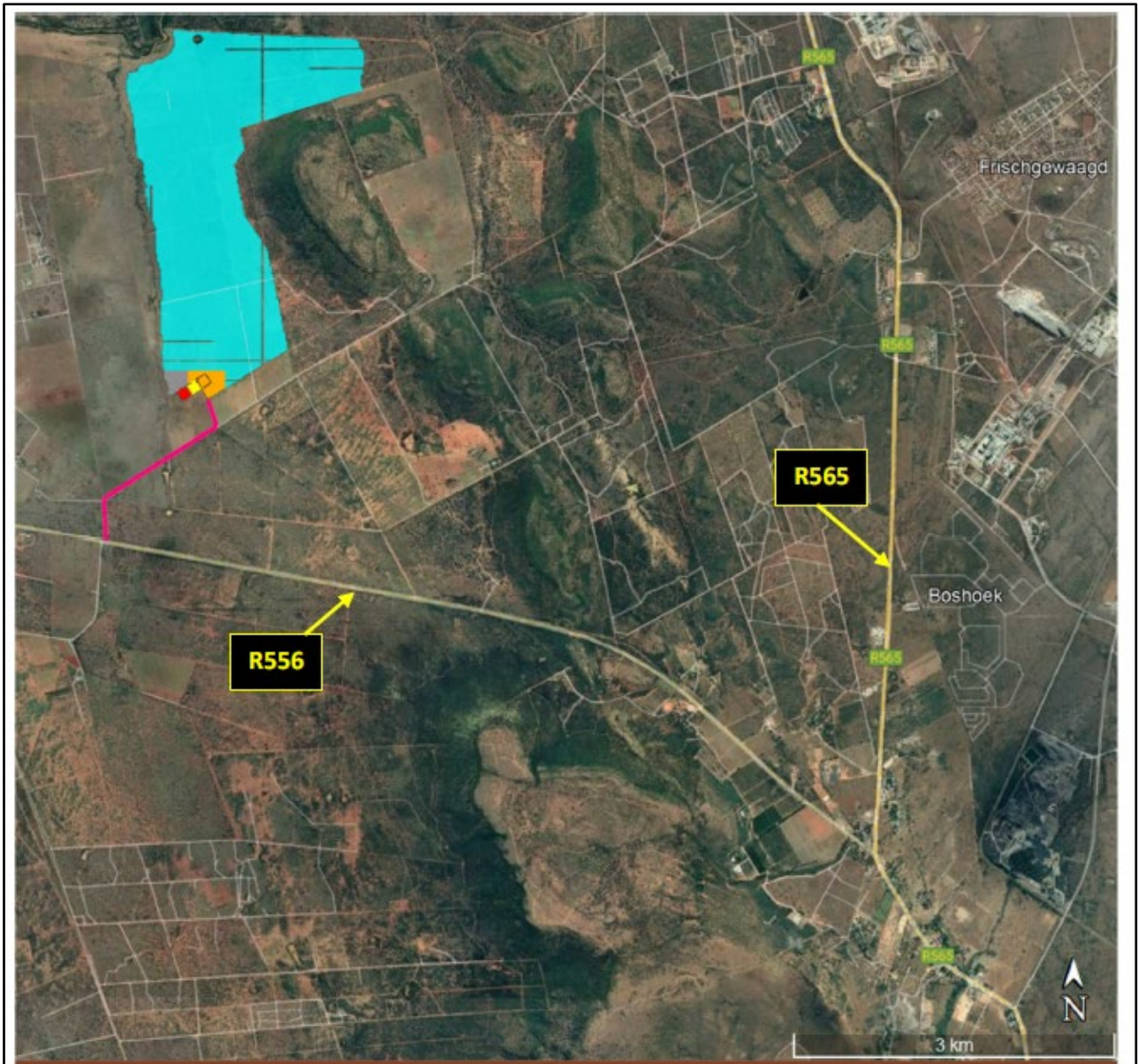


Figure 67: Aerial view of external roads towards the project site (Wink, 2023)

The actual site access control will then need to be placed with a stacking space of at least 25 m from the shared farm road to ensure that at least one large construction vehicle can stack in front of the security control without obstructing other vehicles.

In accordance with the TRH17 Guidelines for the Geometric Design of Rural Roads, the shoulder sight distance for a stop-controlled condition on a road with a speed limit of 80 km/h, needs to be a minimum of 330 m for the largest vehicle (5m set back from the intersecting road).

The required minimum shoulder sight distances are met in both directions at the intersection of the proposed access road and the R556 (see **Figure 68 below**).

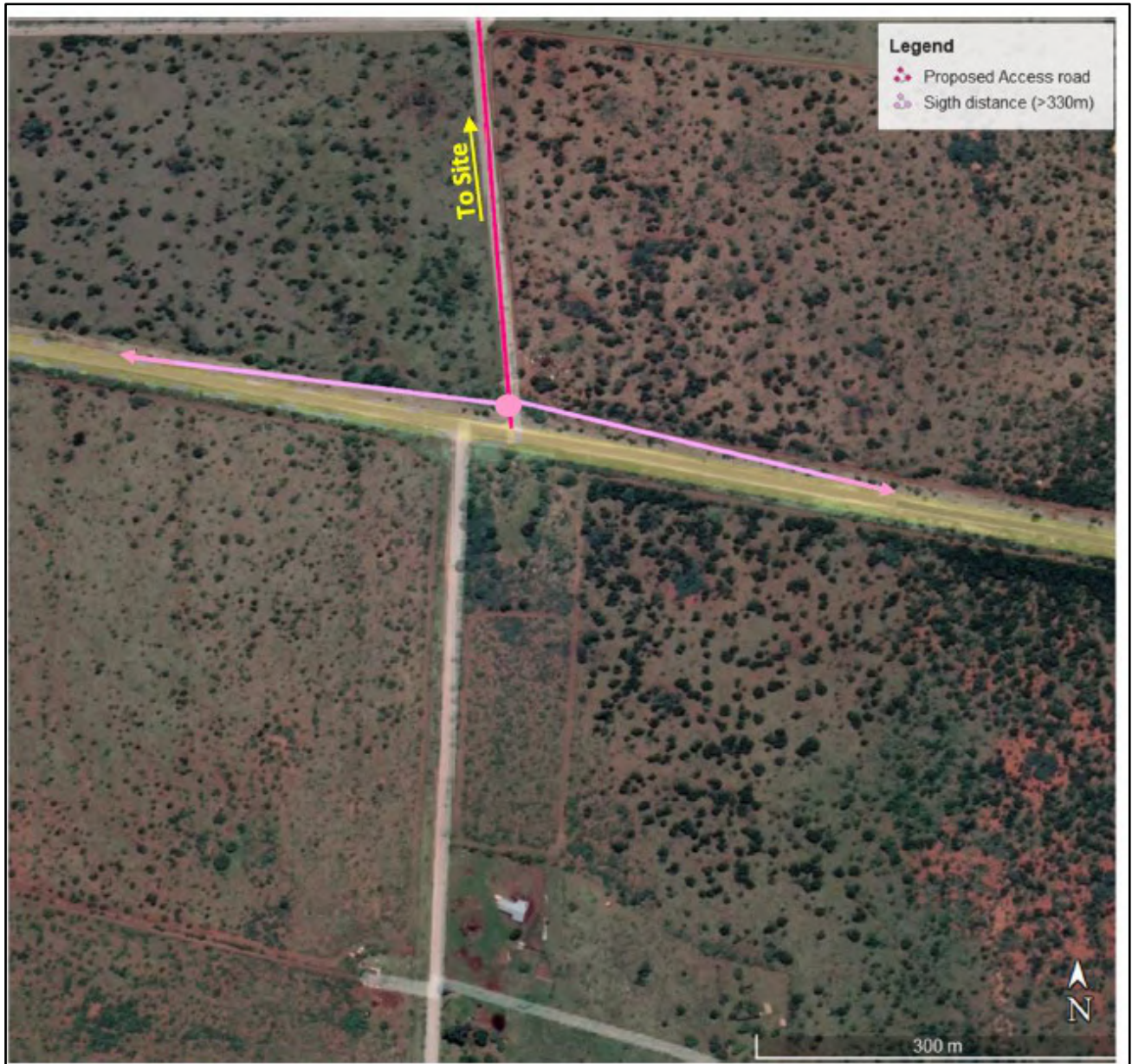


Figure 68: Required sight distances at the access road to Onderstepoort Solar 1 (Wink, 2023)

The access roads leading from the surrounding road network towards the site need to be maintained if damaged by haulage vehicles. The radii at the accesses onto the site need to be large enough to allow for all construction vehicles to turn safely. During the construction phase, temporary road signage in line with South African Road Signs Manual (SARTSM) will need to be erected along the R556 in the vicinity of the project to alert drivers of construction vehicles turning into and out of the road.

It is assumed that the materials, plant, and workers will be sourced from the surrounding towns as far as possible, such as Rasimone. It is expected that minibus taxis travel along the R545, which is located approximately 9 km travel distance to the site. However, in many cases, the developer or appointed contractor of a large-scale project, such as many renewable energy projects, provides shuttle buses or similar for workers during the construction phase.

Table 22: Estimation of daily staff trips (Wink, 2023)

Vehicle Type	Number of vehicles	Max. Number of Employees
Car	20	20 (assuming 1 occupant)
Bakkie	10	15 (assuming 1.5 occupants)
Taxi – 15 seats	15	225
Bus – 80 seats	3	240
Total	48	500

The total estimated daily site trips, at the peak of construction, are shown in the table below.

Table 23: Estimation of daily staff trips (Wink, 2023)

Activity	Number of daily trips
Solar panel component delivery	37
Staff transport	48
Material delivery	150
Total	235

With the recommended mitigations in this report, the impact on the surrounding road network and the general traffic is deemed acceptable, as the 235 trips will be distributed over a 9-hour workday. It is expected that the majority of the trips will occur outside the peak hours (see **Table 23 and 23 above**).

It must also be noted that vehicle trips from material delivery vary depending on the construction task/program, fuel supply arrangements, as well as distance from the material source to the site. Project planning can be used to reduce material delivery during peak hours.

The development traffic impact during the construction phase can be assessed as manageable, considering that the construction phase is temporary in nature and mitigation measures, mentioned in this report, are adhered to and keep the impact level low.

During operation, it is assumed that approximately twenty five full-time employees will be stationed on site and hence vehicle trips generated are low and will have a negligible impact on the external road network.

11.11.5 Impact Assessment

Refer to **Section 13.26** below for the results from the impact assessment from this study.

11.11.6 Conclusions

This report addressed key issues to be considered for the proposed Onderstepoort Solar 1 facility.

The main impact on the external road network will be during the construction phase. This phase is temporary in comparison to the operational period. The number of abnormal loads vehicles was estimated and to be found to be able to be accommodated by the road network including the recommended mitigation measures.

- 1 During operation, it is expected that maintenance and security staff will periodically visit the facility and water be transported to site possibly twice a year for the cleaning of panels. The generated trips can be accommodated by the external road network and the impacts are rated negative low with mitigation measures.
- 2 The traffic generated during the construction phase, although significant, will be temporary and impacts are considered to be of medium negative impact. However, after mitigation a rating of negative low impact can be given.
- 3 The traffic generated during the decommissioning phase will be similar to or even less than the construction phase traffic and the impact on the surrounding road network will also be considered to be of negative low impact after mitigation.

The potential mitigation measures mentioned in the construction and decommissioning phases are:

- 4 Dust suppression of internal gravel roads and the access roads.
- 5 Component delivery to/ removal from the site can be staggered and trips can be scheduled to occur outside of peak traffic periods.
- 6 The use of mobile batching plants and quarries near the site would decrease the impact on the surrounding road network, if available and feasible.
- 7 Staff and general trips should occur outside of peak traffic periods.
- 8 A “dry run” of the preferred route by the haulage company. Should the haulage company be familiar with the route, evidence is to be provided to the Client and the Contractor.
Design and maintenance of the internal gravel roads and maintenance of the access roads.
- 9 If required, any low hanging overhead lines (lower than 5.1m) e.g., Eskom and Telkom lines, along the proposed routes will have to be moved (to be arranged by haulage company and agreed on with the service provider of the OHL) or raised to accommodate the abnormal load vehicles.

The construction and decommissioning phases of a solar power facility are the only significant traffic generators and therefore noise and dust pollution will be higher during these phases. The duration of these phases is of temporary nature, i.e., the impact of the solar power facility on the external traffic on the surrounding road network is temporary and solar facilities, when operational, do not add any significant traffic to the road network.

The proposed development of the Onderstepoort Solar 1 Energy Facility is supported from a traffic engineering perspective provided that the recommended mitigation measures are adhere to.

The impacts associated with the facility are acceptable with the implementation of the recommended mitigation measures and can therefore be authorised.

11.12 Social Impact Assessment

A summary of the Social Impact Assessment (Tanhuke & Chidley, 2023) (contained in **Appendix E7**) follows.

11.12.1 *Details of the Specialist*

The details of the specialist that undertook the Social Impact Assessment follow.

Organisation:	Nemai Consulting	
Name:	C. Chidley	C. Tanhuke
Qualifications:	BA (Economics); BSc Eng (Civil); MBA	BA Environmental Management (Geography)

11.12.2 *Objectives of the Study*

The key objectives of the Social Impact Assessment included the following:

- Describe the social baseline conditions that may be affected by the Project;
- Determine the specific local social impacts of the Project;
- Identify the potential social issues associated with the Project;
- Suggest suitable mitigation measures to address the identified impacts; and
- Make recommendations on preferred options from a social perspective.

11.12.3 *Methodology*

The Socio-Economic Impact Assessment sets out the socio-economic baseline of the study area; predicts social and economic impacts and makes recommendations for mitigation of negative social and economic impacts and measures which can be taken to enhance the positive social and economic impacts.

The baseline study is based on both primary and secondary data. Primary data was collected directly from engagements with community members, landowners and business owners.

The profile of the baseline conditions includes describing the current status quo of the community; including information on a number of social and economic issues such as:

- Demographic data.
- Socio-economic factors such as income and population data.
- Access to services.
- Institutional environment.
- Social Organization (Institutional Context); and
- Statutory and Regulatory Environment.

Secondary data was accessed through South African economic and social databases. Articles and internet searches were also used and are referenced in the text and in the reference sections of this report.

Further primary data was collected for the purposes of the study; these were collected using the following approaches:

- Rapid Rural Assessment:** A survey was conducted to capture visual observations on the social dynamics, community proceedings, community resources and infrastructure.
- Stakeholder Consultations:** Consultations with the affected communities carried out by members of the project team along each project component to discuss the proposed project and to gather their concerns and feedback on the project; and
- Key Informant Interviews:** Informal discussions with the I&APs to help inform the baseline were conducted during site visits and as well as during the scoping phase. These included community members and authority members.

Secondary data was collected using different sources, these included Statistics South Africa Census data as well as a review of relevant municipal, district and other literature.

A GIS was used to conduct an analysis of the area. The use of GIS brings together the demographic and socio-economic data to enable a thorough analysis of the project area.

11.12.4 Key Findings of the Study

The project area is located in a rural agricultural area. The area hosts diverse economic activities such as mining, tourism, hospitality, hunting, and agriculture. In addition to traditional beef raising and grain crops, many farms have shifted to game farming, ecotourism and citrus farming.

The Onderstepoort project site is a game farm, containing animals such as the impala, kudu, Inyala, blesbuck, duiker, sable antelope and buffalos. Bonsmara and Beefmaster are popular cattle breeds in the neighboring livestock farms. A Rainbow Chicken Farm is located to the north-west of the solar cluster, across the adjacent Elandsrivier

Tourism is popular in this area, with common activities being hunting, hiking, game tracking and associated leisure. There are several hotels, lodges, private bed and breakfast establishments, such as African Elegance Tented Lodge, Amritz Private Lodge, Sibusiso Private Game Lodge, Boeskloof Guest House, Selons River Lodge, Bulls in the Bush Lodge, and Keanah Ranch, all of which are located within the direct study area and offer accommodation and recreational activities. All facilities are located at distances greater than 1 000m from the fenceline of the proposed project.

Boshoek Central Business District is located approximately six kilometers from the project area. The center is characterized by an Engen garage, retail stores, small-scale and large-scale business, and informal traders. The center also services farm communities nearby. The presence of a solar park is an opportunity with a positive impact on the local economy, as there are a number of businesses that would be capable of supporting solar operations.

Witkrans Citrus Nursery is another notable farm that is contributing positively to the local economy. It is anticipated that the solar farm will be an additional sustainable component to the area. More sustainable agricultural practices can also be introduced in the area to promote eco-tourism.

The Sundown Country Estate is roughly four kilometers to the east of the project site. The facility offers accommodation and leisure. A similar establishment, the African Elegance Tented Lodge is nearby, to the north. Both have a similar elevation profile to the proposed facility.

A site visit was conducted on the 12th and 15th of January 2023. The purpose of the visit was to compile and collect primary data on the receiving social environment, as well as to understand the expectations of the local people with reference to the proposed project.

A questionnaire was compiled and used as a technique to gather inputs and comments from the local communities.

The purpose of the face-to-face stakeholder interactions was to establish and record unbiased views and/or comments of the proposed project, to ensure that all comments and issues raised during the EIA phase is included in the SIA report.

The overall attitudes that were generated from the outcomes of the interviews were mixed. The positive feedback recorded was the economic stimulus of the project on the local community. Furthermore, installation of the solar farm would alleviate the challenges of loadshedding and businesses closing their doors due to instability of the electricity supply from Eskom.

However, stakeholders raised concerns about the project being developed on agricultural land. Some tenant farmers indicated that they do not welcome the project and will oppose development. The overall background of problems raised was lack of communication, fear of private property damage, and trespassing. The area has expensive livestock and game animals. Concerns of theft were noted as well.

11.12.5 Impact Assessment

Refer to **Section 13.26** below for the results from the impact assessment from this study.

11.12.6 Conclusions

The project site has few social receptors surrounding the site, and the project has a low footprint on the social environment. The social and economic impacts of the project are expected to be positive in the sense that the local economy will be stimulated and broadened. The negative impacts are limited in nature and scope and can be successfully mitigated by changes to the layouts of the panels and management rules and practises. It is therefore found that the project, once the recommended mitigation measures have been implemented, has a nett positive impact on the social environment of the regional study area.

12 IMPACT ASSESSMENT

12.1 General

This section focuses on the pertinent environmental impacts that could potentially be caused during the pre-construction, construction and operational phases of the Project.

Note that an 'impact' refers to the change to the environment resulting from an environmental aspect (or activity), whether desirable or undesirable. An impact may be the direct or indirect consequence of an activity.

Potential impacts were identified as follows:

- Impacts associated with listed activities contained in the EIA Regulations' Listing Notices;
- Impacts identified during the Scoping phase;
- An appraisal of the Project's activities and components;
- An assessment of the receiving biophysical, social, economic and built environments;
- Findings from specialist studies;
- Issues highlighted by environmental authorities; and
- Comments received during public participation from IAPs.

12.2 Impacts associated with Listed Activities

As mentioned, the Project requires Environmental Authorisation for certain activities listed in the EIA Regulations, which serve as triggers for the EIA. The potential impacts associated with the key listed activities are broadly stated in **Table 24** below.

Table 24: Potential Impacts associated with the key listed activities

Listed Activities	Potential Impact Overview
GN No. R. 983 of 4 December 2014 (as amended) (Listing Notice 1)	
<p>GN No. R.983 – Activity 11(i):</p> <p>The development of facilities or infrastructure for the transmission and distribution of electricity -</p> <p>(i) <u>outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts;</u> or</p> <p>(ii) inside urban areas or industrial complexes with a capacity of 275 kilovolts or more;</p> <p>excluding the development of bypass infrastructure for the transmission and distribution of electricity where such bypass infrastructure is —</p> <p>(a) temporarily required to allow for maintenance of existing infrastructure;</p> <p>(b) 2 kilometres or shorter in length;</p> <p>(c) within an existing transmission line servitude; and</p> <p>(d) will be removed within 18 months of the commencement of development.</p>	<ul style="list-style-type: none"> • Impacts associated with the footprint of the physical infrastructure (proposed power line). • Potential loss of sensitive environmental features (e.g. heritage resources, sensitive fauna and flora species, ecosystems, cultivated land) along the proposed power lines • Visual impact associated with the proposed power line. • Cumulative impacts associated with aligning the proposed power line alongside linear developments (including existing roads and power lines).

Listed Activities	Potential Impact Overview
<p>GN No. R.985 – Activity 12 - (h) (ii)(iv):</p> <p>The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.</p> <p>h. North West</p> <p>(ii) A Protected area including municipal or provincial nature reserves as contemplated by NEMPAA or other legislation.</p> <p>(iv) Critical Biodiversity Areas as identified in systematic biodiversity plans adopted by the competent authority or bioregional plans.</p> <p>(v) Sensitive areas as identified in an environmental management framework as contemplated in Chapter 5 of the Act and as adopted by the competent authority;</p> <p>(vi) Areas within a watercourse or wetland, or within 100 metres from the edge of a watercourse or wetland.</p>	<ul style="list-style-type: none"> • Impacts associated with the footprint of the physical infrastructure within 32 m of watercourses. • Adverse effects to resource quality (i.e. flow, in-stream and riparian habitat, aquatic biota and water quality) associated with working in-stream and alongside watercourses. • Destabilisation of affected watercourses. • Reduction in water quality of receiving watercourses due to improper management of storm water, hazardous material and sanitation. • Altering the drainage of the site.
<p>GN No. R.985 – Activity 14(ii)(a) - (c) - (h)(ii)(iv)</p> <p>The development of—</p> <p>(i) dams or weirs, where the dam or weir, including infrastructure and water surface area exceeds 10 square metres; or</p> <p>(ii) infrastructure or structures with a physical footprint of 10 square metres or more;</p> <p>where such development occurs—</p> <p>(a) within a watercourse;</p> <p>(b) in front of a development setback; or</p> <p>(c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse;</p> <p>excluding the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour.</p> <p>h. North West</p> <p>(ii) A Protected area including municipal or provincial nature reserves as contemplated by NEMPAA or other legislation.</p> <p>(iv) Critical Biodiversity Areas as identified in systematic biodiversity plans adopted by the competent authority or bioregional plans.</p> <p>(v) Sensitive areas as identified in an environmental management framework as contemplated in Chapter 5 of the Act and as adopted by the competent authority;</p> <p>(vi) Areas within 5 kilometres from protected areas identified in terms of NEMPAA or from the core areas of a Biosphere reserve.</p>	<ul style="list-style-type: none"> • Construction activities (including bulk earthworks) to be undertaken within 32 m of watercourses. • Clearance of vegetation within Ecological Support areas in terms of the North West Biodiversity Plan. • Soil destabilisation and subsequent erosion. • Proliferation of alien and invasive species.
<p>GN No. R.985 – Activity 18(h)(i)(ii) (v)</p> <p>The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre.</p> <p>b. North West</p> <p>(i) A Protected area including municipal or provincial nature reserves as contemplated by NEMPAA or other legislation.</p> <p>(ii) Areas within 5 kilometres from protected area as identified in terms of NEMPAA or from a biosphere nature reserve.</p>	<ul style="list-style-type: none"> • Clearance of vegetation within Ecological Support areas in terms of the North West Biodiversity Plan. • Soil destabilisation and subsequent erosion. • Proliferation of alien and invasive species.

Listed Activities	Potential Impact Overview
(v) Critical Biodiversity Areas as identified in systematic biodiversity plans adopted by the competent authority or bioregional plans.	
<p>GN No. R.985 – Activity 23(ii)(c) – (h)(iv) The expansion of-</p> <p>(ii) infrastructure or structures where the physical footprint is expanded by 10 square metres or more; where such expansion occurs-</p> <p>(a) within a watercourse;</p> <p>(b) in front of a development setback adopted in the prescribed manner; or</p> <p>(c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse, excluding the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour.</p> <p>(h) North West</p> <p>(iv) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority; Sensitive areas as identified in an environmental management framework as contemplated in Chapter 5 of the Act and as adopted by the competent authority;</p> <p>(vi) Areas within 5 kilometres from protected areas identified in terms of NEMPAA or from the core areas of a Biosphere reserve.</p>	<ul style="list-style-type: none"> • Clearance of vegetation within Ecological Support areas in terms of the North West Biodiversity Plan. • Soil destabilisation and subsequent erosion. • Proliferation of alien and invasive species.
<p>GN No. R.983 – Activity no. 19:</p> <p><i>The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse; but excluding where such infilling, depositing, dredging, excavation, removal or moving -</i></p> <p>(a) will occur behind a development setback;</p> <p>(b) is for maintenance purposes undertaken in accordance with a maintenance management plan;</p> <p>(c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;</p> <p>(d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or</p> <p>(e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.</p>	<ul style="list-style-type: none"> • Construction activities (including bulk earthworks) to be undertaken within 32 m of watercourses. • Adverse effects to resource quality (i.e. flow, in-stream and riparian habitat, aquatic biota and water quality) associated with working in-stream and alongside the watercourse. • Destabilisation of affected watercourses.
<p>GN No. R.983 – Activity 24(ii):</p> <p><i>The development of a road -</i></p> <p>(i) for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010; or</p> <p><u>(ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres;</u></p> <p><u>but excluding a road -</u></p> <p>(a) which is identified and included in activity 27 in Listing Notice 2 of 2014;</p> <p>(b) where the entire road falls within an urban area; or</p>	<ul style="list-style-type: none"> • Clearance of vegetation within Ecological Support areas in terms of the North West Biodiversity Plan. • Soil destabilisation and subsequent erosion. • Proliferation of alien and invasive species.

Listed Activities	Potential Impact Overview
<p><i>(c) which is 1 kilometre or shorter.</i></p> <p>GN No. R.983 – Activity 27:</p> <p><i>The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for-</i></p> <p><i>(i) the undertaking of a linear activity; or</i></p> <p><i>(ii) maintenance purposes undertaken in accordance with a maintenance management plan.</i></p>	<ul style="list-style-type: none"> • Clearance of large areas of indigenous vegetation associated with the construction footprint of the PV Site and associated infrastructure. • Potential loss of sensitive environmental features (e.g. sensitive fauna and flora species). • Visual impacts. • Soil destabilisation and subsequent erosion. • Proliferation of alien and invasive species.
<p>GN No. R.983 – Activity no. 28(ii):</p> <p>Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development:</p> <p>(i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or</p> <p>(ii) <u>will occur outside an urban area, where the total land to be developed is bigger than 1 hectare;</u></p> <p>excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.</p>	<ul style="list-style-type: none"> • Clearance of large areas associated with the construction footprint of the PV Site and associated infrastructure. • Loss of agricultural land. • Socio-economic impacts associated with construction activities.
<p>GN No. R.983 – Activity 56</p> <p><i>The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre—</i></p> <p><i>(i) where the existing reserve is wider than 13,5 meters; or</i></p> <p><i>(ii) where no reserve exists, where the existing road is wider than 8 metres;</i></p> <p><i>excluding where widening or lengthening occur inside urban areas</i></p>	<ul style="list-style-type: none"> • Clearance of indigenous vegetation. • Soil destabilisation and subsequent erosion. • Proliferation of alien and invasive species.
GN No. R. 984 of 4 December 2014 (as amended) (Listing Notice 2)	
<p>GN No. R.984 – Activity no. 1:</p> <p><i>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, excluding where such development of facilities or infrastructure is for photovoltaic installations and occurs -</i></p> <p><i>(a) within an urban area; or</i></p> <p><i>(b) on existing infrastructure.</i></p>	<ul style="list-style-type: none"> • Impacts associated with generating electricity from the Solar PV Plant. • Impacts associated with the footprint of the physical infrastructure. • Impacts to land use. • Potential loss of sensitive environmental features (e.g. heritage resources, sensitive fauna and flora species). • Visual impacts. • Soil destabilisation and subsequent erosion. • Proliferation of alien and invasive species. • Socio-economic impacts. • Traffic impacts.
<p>GN No. R.984 – Activity no. 15:</p>	<ul style="list-style-type: none"> • Clearance of large areas of indigenous vegetation associated with the

Listed Activities	Potential Impact Overview
<p><i>The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for-</i></p> <p><i>(i) the undertaking of a linear activity; or</i></p> <p><i>(ii) maintenance purposes undertaken in accordance with a maintenance management plan.</i></p>	<p>construction footprint of the PV Site and associated infrastructure.</p> <ul style="list-style-type: none"> • Potential loss of sensitive environmental features (e.g. sensitive fauna and flora species). • Visual impacts. • Soil destabilisation and subsequent erosion. • Proliferation of alien and invasive species. • Socio-economic impacts associated with construction activities.
GN No. R. 985 of 4 December 2014 (as amended) (Listing Notice 3)	
<p>GN No. R.985 – Activity 4 - (h)(i)(ii)(iv)</p> <p>The development of a road wider than 4 metres with a reserve less than 13,5 metres.</p> <p>h. North West</p> <p>(i) A protected area including municipal or provincial nature reserves as contemplated by NEMPAA or other legislation;</p> <p>(ii) Sensitive areas as identified in an environmental management framework as contemplated in Chapter 5 of the Act and as adopted by the competent authority;</p> <p>Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority;</p> <p>Core areas in biosphere reserves;</p> <p>(vi) Areas within 5 kilometres from protected areas identified in terms of NEMPAA or from a biosphere reserve;</p>	<ul style="list-style-type: none"> • Impacts associated with building an access road within Ecological Support areas in terms of the North West Biodiversity Plan.
<p>GN No. R.985 – Activity 12 - (h) (ii)(iv):</p> <p>The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.</p> <p>h. North West</p> <p>(ii) A Protected area including municipal or provincial nature reserves as contemplated by NEMPAA or other legislation.</p> <p>(iv)Critical Biodiversity Areas as identified in systematic biodiversity plans adopted by the competent authority or bioregional plans.</p> <p>(v)Sensitive areas as identified in an environmental management framework as contemplated in Chapter 5 of the Act and as adopted by the competent authority;</p> <p>(vi) Areas within a watercourse or wetland, or within 100 metres from the edge of a watercourse or wetland.</p>	<ul style="list-style-type: none"> • The clearance of large tracts of indigenous vegetation and potential loss of sensitive fauna within Ecological Support areas in terms of the North West Biodiversity Plan.
<p>GN No. R.985 – Activity 14(ii)(a) - (c) - (h)(ii)(iv)</p> <p>The development of—</p> <p>(i) dams or weirs, where the dam or weir, including infrastructure and water surface area exceeds 10 square metres; or</p> <p>(ii) <u>infrastructure or structures with a physical footprint of 10 square metres or more;</u></p> <p>where such development occurs—</p> <p>(a) within a watercourse;</p>	<ul style="list-style-type: none"> • Impacts to biodiversity within ESA as a result of the development of infrastructure within 32 m from watercourses, including access roads, stormwater system and associated infrastructure and structures. • Effects to resource quality (i.e. flow, in-stream and riparian habitat, aquatic biota and water quality) associated with working in-stream and alongside the watercourses within ESA.

Listed Activities	Potential Impact Overview
<p>(b) in front of a development setback; or (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour. h. North West (ii) A Protected area including municipal or provincial nature reserves as contemplated by NEMPAA or other legislation. (iv) Critical Biodiversity Areas as identified in systematic biodiversity plans adopted by the competent authority or bioregional plans. (v) Sensitive areas as identified in an environmental management framework as contemplated in Chapter 5 of the Act and as adopted by the competent authority; (vi) Areas within 5 kilometres from protected areas identified in terms of NEMPAA or from the core areas of a Biosphere reserve.</p>	
<p>GN No. R.985 – Activity 18(h)(i)(ii) (v) The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre. b. North West (i) A Protected area including municipal or provincial nature reserves as contemplated by NEMPAA or other legislation. (ii) Areas within 5 kilometres from protected area as identified in terms of NEMPAA or from a biosphere nature reserve. (v) Critical Biodiversity Areas as identified in systematic biodiversity plans adopted by the competent authority or bioregional plans.</p>	<ul style="list-style-type: none"> • Impacts to biodiversity as a result of the widening of roads within an area classified in terms of the North West Biodiversity Plan, or within 32m from a dam/watercourse.
<p>GN No. R.985 – Activity 23(ii)(c) – (h)(iv) The expansion of- (ii) infrastructure or structures where the physical footprint is expanded by 10 square metres or more; where such expansion occurs- (a) within a watercourse; (b) in front of a development setback adopted in the prescribed manner; or (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse, excluding the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour. (h) North West (iv) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority; Sensitive areas as identified in an environmental management framework as contemplated in Chapter 5 of the Act and as adopted by the competent authority; (vi) Areas within 5 kilometres from protected areas identified in terms of NEMPAA or from the core areas of a Biosphere reserve.</p>	<ul style="list-style-type: none"> • Impacts to biodiversity as a result of the widening of roads within an area classified in terms of the North West Biodiversity Plan, or within 32m from a dam/watercourse.

12.3 Comments Raised by Organs of State and I&APs

The comments raised by authorities (both regulatory and commenting) and I&APs to date during the execution of the EIA are captured and addressed in the CRR (refer to **Appendix G**).

The consolidated comments raised by authorities and I&APs have been succinctly grouped into the following main categories (*note: please refer to the Comments and Response Report for a comprehensive and accurate representation of the issues raised*):

- Land use –
 - Servitude restrictions.
- Water use –
 - Application in terms of the NWA for water uses if applicable.
- Socio-economic impacts –
 - Safety of the Agricultural Community.
- Ecology –
 - Ground-thruthing of Sungazer lizard presence/absence.
 - Compliance with BirdLife SA Guideline.
- Agriculture –
 - Fire hazards potential risk to surrounding agriculture.
- Existing infrastructure –
 - Impacts to existing infrastructure (power lines, telephone lines, roads, railway lines, pipelines, etc.).
- Civil Aviation –
 - Compliance with the procedures of the South African Civil Aviation Authority (SACAA).
- Technical information –
 - Technical details and layout for the proposed facility.
- EIA Process –
 - Confirm listed activities triggered and assess related impacts.
 - Details of project components.
 - Sufficiently detailed layout and sensitivity maps.
 - Need for amended application form.
 - Specialist studies –
 - Requirements for terms of reference.
 - Include limitations and methodologies.
 - Understanding of ‘no-go’ areas.
 - Address contradicting recommendations.
 - Detailed/practical mitigation measures.
 - Assessment of cumulative impacts.
 - Reporting on identified Environmental Themes and adherence to Screening Tool.
 - Cumulative impact assessment to consider other similar projects within a 30km radius of the proposed development site.
 - Assessment of alternatives.

- Requirements for the EMPr.
- ☐ Public participation –
 - Written consent from landowner.
 - Compliance with regulated requirements.
 - Recording and addressing comments from registered I&APs and organs of state.

These issues received further attention during the investigations in the EIA phase, including the environmental specialist studies.

12.4 Project Activities

In order to understand the impacts related to the Project it is necessary to unpack the activities associated with the project life-cycle, as done in the sub-sections to follow.

12.4.1 *Project Phase: Pre-construction*

Some of the main Project activities, as well as high-level environmental activities, to be undertaken in the pre-construction phase are listed in **Table 25** below.

Table 25: Simplified List of Activities associated with Pre-Construction Phase

<u>Project Phase: Pre-construction</u>
Project Activities
• Negotiations and agreements with the affected landowner, stakeholders and authorities
• Lease Agreement
• Registration of power line servitude
• Detailed engineering design
• Detailed geotechnical investigations, including geophysical investigations
• Survey and mark development
• Procurement process for Contractor
• Review Contractor's method statements (as relevant)
• Establish new access roads and undertake selective improvements to existing access roads to facilitate the delivery of construction plant and materials
• Arrangements for accommodation of construction workers (off site)
• The building of a site office and ablution facilities
• Confirmation of the location and condition of all structures and infrastructure on the PV Site
• Determining and documenting the conditions of the roads to be used during construction
• Fencing off PV Site
High Level Environmental Activities
• Diligent compliance monitoring of the EMPr, Environmental Authorisation and other relevant environmental legislation
• Pre-construction environmental survey
• Develop Environmental Monitoring Programme (e.g. air quality, water quality, noise, traffic, social)
• Barricading of sensitive environmental features (e.g. watercourses)
• Obtain permits for impacts to Species of Conservation Concern (SCC), if avoidance is not possible
• On-going consultation with I&APs

Project Phase: Pre-construction

- Other activities as per EMPr

12.4.2 *Project Phase: Construction*

Some of the main Project activities, as well as high-level environmental activities, to be undertaken in the construction phase are listed in **Table 26** below.

Table 26: Simplified List of Activities associated with Construction Phase

Project Phase: Construction
Project Activities
• Site establishment.
• Prepare access roads.
• Relocation of existing structures and infrastructure, as relevant.
• Establish construction laydown areas.
• Bulk fuel storage.
• Delivery of construction material.
• Transportation of equipment, materials and personnel.
• Storage and handling of material.
• Construction employment.
• Site clearing (as necessary).
• Construction of PV Plant infrastructure.
• Construction of substation components.
• Construction of associated infrastructure.
• Concrete Works.
• Erection of steel structures.
• Mechanical and Electrical Works.
• Electrical supply.
• Material delivery and offloading.
• Stringing of transmission lines.
• Stockpiling.
• Waste and wastewater management.
High Level Environmental Activities
• Diligent compliance monitoring of the EMPr, Environmental Authorisation and other relevant environmental legislation.
• Implement Environmental Monitoring Programme
• Reinstatement and rehabilitation of construction domain.
• On-going consultation with IAPs.
• Other activities as per EMPr.

12.4.3 *Project Phase: Operation*

Some of the main Project activities, as well as high-level environmental activities, to be undertaken in the operational phase are listed in **Table 27** below.

Table 27: Simplified List of Activities associated with Operational Phase

<u>Project Phase: Operation</u>
Project Activities
<ul style="list-style-type: none"> • Testing and commissioning the Project's components. • Cleaning of PV modules • Servitude access arrangements and requirements. • Routine maintenance inspections of power lines and servitudes. • Controlling vegetation. • Managing stormwater and waste. • Conducting preventative and corrective maintenance. • Monitoring of the PV facility's performance. • On-going consultation with directly affected parties.
High Level Environmental Activities
<ul style="list-style-type: none"> • On-going consultation with I&APs. • Other activities as per EMPr for Operational Phase.

12.5 Environmental Aspects

Environmental aspects are regarded as those components of an organisation's activities, products and services that are likely to interact with the environment and cause an impact.

The environmental aspects that have been identified for the proposed Project, which are linked to the project activities, are provided in **Table 28** below. Note that only high level aspects are provided.

Table 28: Environmental Aspects associated with Project Life-Cycle

<u>Project Phase: Pre-construction</u>
<ul style="list-style-type: none"> • Inadequate consultation with landowners, affected parties, stakeholders and authorities. • Inadequate environmental and compliance monitoring. • Poor construction site planning and layout. • Site-specific environmental issues not fully understood. • Land occupancy by temporary buildings, provisional on-site facilities and storage areas. • Inaccurate pre-construction environmental survey. • Absence of relevant permits (if required). • Lack of barricading of sensitive environmental features. • Poor waste management. • Absence of ablution facilities.
<u>Project Phase: Construction</u>
<ul style="list-style-type: none"> • Inadequate consultation with landowners. • Inadequate environmental and compliance monitoring. • Lack of environmental awareness creation. • Indiscriminate site clearing. • Poor site establishment. • Poor management of access and use of access roads. • Disruptions to traffic.

Project Phase: Construction
• Poor transportation practices.
• Poor fencing arrangements.
• Erosion.
• Disruptions to existing services.
• Disturbance of topsoil.
• Poor management of excavations.
• Inadequate storage and handling of material.
• Inadequate storage and handling of hazardous material.
• Poor maintenance of equipment and plant.
• Poor management of labour force.
• Pollution from ablution facilities.
• Inadequate management of construction camp.
• Poor waste management practices – hazardous and general solid, liquid.
• Wastage of water.
• Disturbance to land use along power line route.
• Poor management of pollution generation potential.
• Damage to significant flora (if encountered).
• Damage to significant fauna (if encountered).
• Environmental damage where watercourses are crossed.
• Inadequate stormwater management.
• Damage to environmentally sensitive areas.
• Damage to cultural heritage and palaeontological features (if encountered).
• Poor reinstatement and rehabilitation.

Project Phase: Operation
• Inadequate environmental and compliance monitoring.
• Inadequate management of routine maintenance and maintenance works.
• Inadequate management of vegetation.
• Inadequate stormwater management.
• Pollution caused by cleaning of panels.
• Pollution caused by dangerous good (e.g. transformer oils) associated with the onsite substation.
• Inadequate management of light pollution.
• Failure to comply with health, safety and environmental specifications.

12.6 Potentially Significant Environmental Impacts

Environmental impacts are the change to the environment resulting from an environmental aspect, whether desirable or undesirable.

Note that it is not the intention of the impact assessment to evaluate all potential environmental impacts associated by the Project's environmental aspects, but rather to focus on the potentially significant direct, indirect and cumulative impacts identified during the Scoping phase and any additional issues uncovered during the EIA phase.

The potentially significant environmental impacts associated with the Project, as listed in **Table 29** below, were identified through an appraisal of the following:

- Project-related components and infrastructure (see **Section 9**);
- Operation of the PV Plant and power line;
- Activities associated with the project life-cycle (i.e. pre-construction, construction and operation);
- Nature and profile of the receiving environment and potential sensitive environmental features and attributes (see **Section 11**);
- Findings from specialist studies (see **Section 12**);
- Understanding of direct and indirect effects of the Project as a whole (see **Section 13**);
- Comments received during public participation (see **Section 15**); and
- Legal and policy context (see **Section 5**).

It is noted that the potentially significant environmental impacts listed in **Table 27** were evaluated as part of the specialist studies and suitable mitigation measures were identified where it was found that these impacts could possible occur. These impacts are assessed in **Sections 13.9 – 13.28** below.

Table 29: Potentially Significant Environmental Impacts associated with the Project

Environmental Factor	Construction Phase Potential Issues / Impacts	Operational Phase Potential Issues / Impacts
Land Use	<ul style="list-style-type: none"> ▪ Sterilisation of land for other land use types. ▪ Setbacks / conditions associated with surrounding land and infrastructure. 	<ul style="list-style-type: none"> ▪ Sterilisation of land for other land use types up to the decommissioning of the Project (if applicable). ▪ Servitude restrictions associated with proposed power line (grid connection).
Geology	<ul style="list-style-type: none"> ▪ Suitability of geological conditions to support the Solar PV Plant. 	<ul style="list-style-type: none"> ▪ Suitability of geological conditions to support the Solar PV Plant.
Geohydrology	<ul style="list-style-type: none"> ▪ Groundwater pollution due to spillages and poor construction practices. ▪ Utilisation of boreholes, if required. 	<ul style="list-style-type: none"> ▪ Groundwater pollution due to poor operation and maintenance practices. ▪ Utilisation of boreholes, if required.
Topography	<ul style="list-style-type: none"> ▪ Visual impacts. ▪ Erosion of areas cleared for construction purposes. ▪ Crossing topographic features (watercourses). 	<ul style="list-style-type: none"> ▪ Crossing topographic features (watercourses). ▪ Visual impact caused by proposed Project infrastructure and landscape transformation. ▪ Glint and glare from solar panels.
Soil	<ul style="list-style-type: none"> ▪ Soil erosion due to clearance and inadequate stormwater management. ▪ Soil compaction. ▪ Soil contamination due to spillages and poor construction practices. ▪ Loss of topsoil. 	<ul style="list-style-type: none"> ▪ Soil erosion due to inadequate stormwater management. ▪ Soil contamination due to poor operation and maintenance practices.
Surface Water	<ul style="list-style-type: none"> ▪ Alteration of drainage over the PV Site. ▪ Surface water pollution due to spillages and poor construction practices. ▪ Encroachment of construction activities into watercourses and their buffer zones. ▪ Impacts where access roads and ancillary infrastructure cross / are in 	<ul style="list-style-type: none"> ▪ Sedimentation through silt-laden runoff, caused by inadequate stormwater management. ▪ Water resources could be contaminated through inadequate storage and handling of hazardous materials, leaks from the BESS and poor management of waste and wastewater.

Environmental Factor	Construction Phase Potential Issues / Impacts	Operational Phase Potential Issues / Impacts
	close proximity to watercourses (e.g., sedimentation, loss of vegetation, destabilisation of watercourse structure).	<ul style="list-style-type: none"> ▪ Water use requirements of the Project need to be satisfied.
Flora & Fauna	<ul style="list-style-type: none"> ▪ Habitat loss / fragmentation. ▪ Potential loss, disturbance or displacement of protected fauna and flora species. ▪ Human - animal conflicts. ▪ Noise and vibration impacts to fauna. ▪ Nights lights may affect nocturnal faunal species. ▪ Illegal harvesting and poaching of faunal and floral species by construction workers. ▪ Pollution of the biophysical environment from poor construction practices. ▪ Proliferation of invasive alien species in disturbed areas. 	<ul style="list-style-type: none"> ▪ Habitat fragmentation (e.g., barriers to animal movement). ▪ Shading out of plants by solar panels. ▪ Reflection of sunlight from the solar panels could adversely affect birds. ▪ Risk to birds from collision with infrastructure and from electrocution. ▪ Electrical faulting from birds. ▪ Chemical pollution associated with cleaning the PV panels. ▪ Proliferation of invasive alien species in disturbed areas.
Socio-economic Environment	<ul style="list-style-type: none"> ▪ Influx of people seeking employment and associated impacts (e.g., foreign workforce, cultural conflicts, squatting, demographic changes). ▪ Safety and security. ▪ Use of local road network. ▪ Nuisance from dust and noise. ▪ Consideration of local labourers and suppliers in area – stimulation of local economy (positive impact). ▪ Transfer of skills (positive impact). 	<ul style="list-style-type: none"> ▪ Direct and indirect economic opportunities as a result of the Project. ▪ Threats to human and animal health from electromagnetic field (power line and on-site substation).
Air Quality	<ul style="list-style-type: none"> ▪ Dust from the use of dirt roads by construction vehicles. ▪ Dust from bare areas that have been cleared for construction purposes. ▪ Emissions from construction equipment and machinery. ▪ Tailpipe emissions from construction vehicles. 	<ul style="list-style-type: none"> ▪ The efficiency of the solar plant could be reduced if the modules are soiled (covered) by particulates/dust. ▪ Impacts to air quality caused by the operation and maintenance of the facility include dust from the use of dirt roads and tailpipe emissions from vehicles.
Noise	<ul style="list-style-type: none"> ▪ Localised increases in noise may be caused by construction activities. 	N/A
Agriculture	<ul style="list-style-type: none"> ▪ Loss of fertile soil through land clearance. ▪ Soil erosion. ▪ Loss of topsoil. ▪ Risk of harm to livestock from construction activities. 	<ul style="list-style-type: none"> ▪ Loss of possible future agricultural land use due to direct occupation by the development footprint. ▪ Soil erosion due to inadequate stormwater management.
Historical and Cultural Features	<ul style="list-style-type: none"> ▪ Possible direct impacts on below-ground archaeological deposits and fossils as a result of ground disturbance. 	Possible impacts to the cultural landscape as a result of the introduction of incompatible structures and infrastructure to the rural landscape.
Existing Structures & Infrastructure	<ul style="list-style-type: none"> ▪ Setbacks / conditions associated with surrounding land and infrastructure. ▪ Crossing of existing infrastructure by power line. 	<ul style="list-style-type: none"> ▪ Setbacks / conditions associated with surrounding land and infrastructure. ▪ Disturbances to infrastructure traversed by power line during maintenance activities.

Environmental Factor	Construction Phase Potential Issues / Impacts	Operational Phase Potential Issues / Impacts
Transportation	<ul style="list-style-type: none"> ▪ Increase in traffic on the local road network. ▪ Transportation of materials and construction personnel to site. ▪ Impacts to road conditions. ▪ Speeding and reckless driving by construction personnel. ▪ Construction vehicles accessing and leaving the sites via N6 national road. ▪ Use of oversized vehicles/abnormal loads, as required. ▪ Risks to other road users. 	<ul style="list-style-type: none"> ▪ Transportation of maintenance materials, as well as operational and maintenance personnel, to site. ▪ Safe access, taking into consideration the high speed environment along the N6. ▪ Sun glare off PV panels.
Aesthetics	<ul style="list-style-type: none"> ▪ Landscape transformation. ▪ Visual impacts associated with construction activities. 	<ul style="list-style-type: none"> ▪ Landscape transformation. ▪ Inadequate reinstatement and rehabilitation of construction footprint. ▪ Light pollution. ▪ High visibility of power lines to visual receptors.
Health	<ul style="list-style-type: none"> ▪ Hazards related to construction work. ▪ Increased levels of dust and particulate matter. ▪ Increased levels of noise. ▪ Water (surface and ground) contamination. ▪ Poor water and sanitation. ▪ Communicable diseases. ▪ Psychosocial disorder (e.g. social disruptions). ▪ Safety and security. ▪ Lack of suitable health services. 	<ul style="list-style-type: none"> ▪ Hazards related to operation and maintenance work. ▪ Fire and explosion risks during BESS operation.

The cumulative impacts are discussed in **Section 13.28** below.

The findings of the specialists are of particular importance in terms of understanding the impacts of the Project and managing these during the project life-cycle, as these studies focused on the significant environmental issues identified during the execution of the EIA. As can be seen from the various impact assessments performed by the specialists, there are a host of cross-cutting impacts that are addressed in a number of these studies. The mitigation measures proposed by the specialists for these similar types of impacts are regarded as complementary and they are aligned with best practices and principles.

12.7 Impact Assessment Methodology

The impacts and the proposed management thereof are first discussed in **Section 13.9** to **Section 13.26** below on a qualitative level and thereafter quantitatively assessed by evaluating the nature, extent, magnitude, duration, probability and ultimately the significance of the impacts (refer to methodology provided in **Table 30** below). Where applicable, the impact assessments and significance ratings provided by the respective specialists are included.

The assessment considers impacts before and after mitigation, where in the latter instance the residual impact following the application of the mitigation measures is determined.

In the case of the specialist studies, some of the impact assessment methodologies deviated from the approach shown in **Table 30** below. However, the quantitative basis for these specialist evaluations of the impacts to specific environmental features still satisfied the intention of the EIA.

Table 30: Quantitative Impact Assessment Methodology

Nature (/Status)

The project could have a positive, negative or neutral impact on the environment.

Extent

- Local - extend to the site and its immediate surroundings.
- Regional - impact on the region but within the province.
- National - impact on an interprovincial scale.
- International - impact outside of SA.

Magnitude

Degree to which impact may cause irreplaceable loss of resources.

- Low - natural and social functions and processes are not affected or minimally affected.
- Medium - affected environment is notably altered; natural and social functions and processes continue albeit in a modified way.
- High - natural or social functions or processes could be substantially affected or altered to the extent that they could temporarily or permanently cease.

Duration

- Short term - 0-5 years.
- Medium term - 5-11 years.
- Long term - impact ceases after the operational life cycle of the activity either because of natural processes or by human intervention.
- Permanent - mitigation either by natural process or by human intervention will not occur in such a way or in such a time span that the impact can be considered transient.

Probability

- Almost certain - the event is expected to occur in most circumstances.
- Likely - the event will probably occur in most circumstances.
- Moderate - the event should occur at some time.
- Unlikely - the event could occur at some time.
- Rare/Remote - the event may occur only in exceptional circumstances.

Significance

Provides an overall impression of an impact's importance, and the degree to which it can be mitigated.

The range for significance ratings is as follows-

0 – Impact will not affect the environment. No mitigation necessary.

1 – No impact after mitigation.

2 – Residual impact after mitigation.

3 – Impact cannot be mitigated.

12.8 Impact Mitigation

12.8.1 *Mitigation Hierarchy*

Impacts are to be managed by assigning suitable mitigation measures, where the objectives are to:

- Find more environmentally sound ways of executing an activity;
- Enhance the environmental benefits of a proposed activity;
- Avoid, minimise or remedy negative impacts; and
- Ensure that residual negative impacts are within acceptable levels.

Mitigation should strive to abide by the following hierarchy – (1) prevent; (2) reduce; (3) rehabilitate (or remediate); and/or (4) compensate for the environmental impacts.

The proposed mitigation of the impacts associated with the Project includes specific measures identified by the technical team (including engineering solutions) and environmental specialists, stipulations of environmental authorities and environmental best practices.

Note that the mitigation measures in the subsequent sections are not intended to be exhaustive, but rather focus on the potentially significant impacts identified.

The EMPr's (contained in **Appendix H**) provide a comprehensive list of mitigation measures for specific elements of the Project and the receiving environment, which extends beyond the impacts evaluated in the body of the EIA Report.

12.8.2 *EMPr Framework*

An EMPr represents a detailed plan of action prepared to ensure that recommendations for enhancing positive impacts and/or limiting or preventing negative environmental impacts are implemented during the life-cycle of a project.

The content of an EMPr must either contain the information set out in Appendix 4 of the EIA Regulations or must be a generic EMPr relevant to an application as identified and gazetted by the Minister in a Government Notice. Once the Minister has identified, through a Government Notice, that a generic EMPr is relevant to an application for Environmental Authorisation, that generic EMPr must be applied by all parties involved in the EA process, including, but not limited to, the Applicant and the Competent Authority.

In accordance with the above, the following EMPr's were developed for the Project:

- Generic EMPr for the development and expansion for overhead electricity transmission and distribution infrastructure (contained in **Appendix H2**);
- Generic EMPr for the development and expansion of substation infrastructure for the transmission and distribution of electricity (contained in **Appendix H3**); and
- Normal EMPr for the Solar PV Plant (contained in **Appendix H1**).

All liability for the implementation of the EMPr (as well as the EIA findings and Environmental Authorisation, if granted) lies with the Applicant.

The following considerations and assumptions accompany the compilation of the EMPr for the Solar PV Plant:

- The EMPr is guided by the following principles, based on Lochner (2005) -

- **Continuous improvement** - The Applicant should be committed to review and to continually improve environmental management, with the objective of improving overall environmental performance;
 - **Broad level of commitment** - A broad level of commitment is required from all levels of management as well as the workforce in order for the implementation of the EMPr to be successful and effective; and
 - **Flexible and responsive** - The implementation of the EMPr needs to be responsive to new and changing circumstances. The EMPr report is a dynamic “living” document that will need to be updated regularly throughout the duration of the project life-cycle.
- Compliance with the EMPr must be audited in terms of Regulation 34 of the EIA Regulations.
- The EMPr provides the framework for the overarching environmental management requirements for the project life-cycle. Following detailed design and planning, the EMPr may need to be revised to render the management actions more explicit and accurate to the final project specifications. Any amendments to the EMPr must be undertaken in accordance with Regulations 35 – 37 of the EIA Regulations.
- The EMPr will be linked to the project’s overall Environmental Management System (EMS) (if applicable), where the EMS constitutes an iterative process that aims to achieve continuous improvement and enhanced environmental performance.
- Although every effort has been made to ensure that the scope and level of detail of the EMPr are tailored to the level of environmental risk (i.e., type and scale of activity and the sensitivity of the affected environment) and the project- and site-specific conditions, certain of the environmental management requirements within the EMPr may be regarded as generic to make provision for activities that may take place as part of the overall Project.

12.9 Land Use

12.9.1 *Impact Description*

Land is required for constructing the proposed infrastructure associated with the Solar PV Plant. In addition, a servitude will be required for the proposed power line (grid connection).

The areas affected by the proposed Project footprint are rural in nature. The Project’s PV Site is vacant and was historically used for agricultural purposes. The landowner has signed an Option to Lease Agreement with the Applicant. The land use at the site earmarked for the proposed Solar PV Plant will change to accommodate the proposed development. Following decommissioning, the land can be rehabilitated to a desired end state.

12.9.2 *Impact Assessment*

Environmental Feature	Land Use
Relevant Alternatives & Activities	All physical infrastructure and ancillary structures that form part of the Project
Project life-cycle	Construction & operational phases
Potential Aspects & Impacts	Proposed Management Objectives / Mitigation Measures
<ul style="list-style-type: none"> • Change of land use at site earmarked for Solar PV Plant. 	<ul style="list-style-type: none"> ○ Remove the minimum amount of vegetation required during construction to build hardstanding areas, powerline towers, and PV module structures and roads.

	○ Rehabilitate areas impacted on during construction.
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	+/- Impacts	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	-	local	medium	short-term	almost certain	2
After Mitigation	-	local	medium	short-term	moderate	1

12.10 Soils

12.10.1 Impact Description

According to Gouws (2023), the soil at the PV Site is highly erodible. During the construction phase areas will be cleared of vegetation, which may lead to soil erosion. Erosion could also take place in the absence of suitable stormwater management. The EMPr includes suitable storm water management measures to prevent the occurrence of erosion.

Soil may be polluted by poor storage or handling of material, spillages and inadequate housekeeping practices. Specific mitigation measures are contained in the EMPr, where the primary objective is the effective and safe management of materials on site, in order to minimise the impact of these materials on the biophysical environment. The same objective applies to the correct management and handling of hazardous substances (e.g. fuel, transformer oil, batteries).

12.10.2 Impact Assessment

Environmental Feature	Soils
Relevant Alternatives & Activities	Construction and operational activities
Project life-cycle	Construction & operational phases
Potential Aspects & Impacts	Proposed Management Objectives / Mitigation Measures
<ul style="list-style-type: none"> • Soil erosion. • Soil compaction. • Soil pollution. 	<ul style="list-style-type: none"> ○ Stabilisation of cleared areas to prevent and control erosion. ○ Manage drainage from sites to minimise erosion. ○ Reinstate and rehabilitate disturbed areas to prevent future erosion. ○ See mitigation measures regarding hazardous substances & waste.

	+/- Impacts	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	-	local	medium-high	short-term	likely	3
After Mitigation	-	local	low	short-term	unlikely	1

12.11 Geohydrology

12.11.1 Impact Description

Groundwater may be impacted by the Project as follows:

- ❑ Possible influence on groundwater flow as a result of trenching and building of infrastructure and structures associated with the development footprint during construction;
- ❑ Use of groundwater during construction and operational phases; and
- ❑ Potential contamination of groundwater during construction and operational phases as a result of inadequate management of wastewater and spillages of dangerous goods.

12.11.2 *Impact Assessment*

Environmental Feature	Geohydrology
Relevant Alternatives & Activities	Construction and operational activities
Project life-cycle	Construction & operational phases
Potential Aspects & Impacts	Proposed Management Objectives / Mitigation Measures
<ul style="list-style-type: none"> • Groundwater pollution. • Groundwater use. • Impacts to groundwater flow. 	<ul style="list-style-type: none"> ○ Provide suitable protection of groundwater during excavations. ○ All storage tanks containing hazardous materials must be placed in bunded containment areas with impermeable surfaces. The bunded area must be able to contain 110% of the total volume of the stored hazardous material. ○ Provide sufficient and suitable sanitation facilities during construction and operational phases, which shall conform to all relevant health and safety standards and codes. ○ Reduce sediment loads in water from dewatering operations. All dewatering shall be done through temporary sediment traps (e.g. constructed out of geo-textiles and hay bales). ○ If any groundwater is to be used during the construction and operational phases, it will need to comply with the provisions of the NWA.

	+/- Impacts	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	-	local	medium-high	long-term	likely	3
After Mitigation	-	local	low	long-term	unlikely	1

12.12 Surface Water

12.12.1 *Hydrology*

12.12.1.1 Impact Description

Two riparian zones were identified during the site visits. The one riparian zone being that of the Elands River and the other being the riparian zone of the non-perennial river. Vegetation species in these two riparian zones comprised of woody and non woody species such as *Diospyros lycioides*, *Searsia lancea*, *Vachelia karoo*, *Ziziphus mucronata*, *Eragrostis chloromelas*, *Eragrostis rigidior*, *Aristida congesta* subsp *congesta*, *Aristida congesta* subsp *barbicollis*, *Setaria sphacelata* var *torta*, *Cynodon dactylon*, *Eragrostis trichophora*, *Tagetes minuta*, and *Zinia peruviana*. The study area traverses small sections of this non-perennial riparian zone at a few of areas while the Alternative 1 layout traverses one small section of the Elands River Riparian

Zone. Alternative 2 does take into account both riparian zones as well as its 32 m buffer zones and is therefore outside any freshwater sensitive features.

12.12.1.2 Impact Assessment

Impacts to hydrological function

Nature: Changes to flood regimes of the watercourse through, for example, flood suppression, unseasonal flooding or the loss of flood attenuation capacity.				
ACTIVITY: Sources include the compaction of soil, vegetation removal, redirecting surface water, changes to the surface water characteristics or through construction of roads.				
	Alternative 1		Alternative 2	
	Without mitigation	With mitigation	Without mitigation	With mitigation
Construction Phase				
Probability	Moderate (3)	Unlikely (2)	Unlikely (2)	Unlikely (2)
Duration	Short term (2)	Short term (2)	Short term (2)	Short term (2)
Extent	Regional (3)	Local (2)	Regional (3)	Local (2)
Magnitude	Low (4)	Low (4)	Low (4)	Minor (2)
Significance	27 (Low to Moderate)	16 (Low)	18 (Low)	12 (Low)
Status (positive or negative)	Negative	Negative	Negative	Negative
Operational Phase				
Probability	Moderate (3)	Unlikely (2)	Minor (1)	Rare (1)
Duration	Medium term (3)	Medium term (3)	Short term (2)	Short term (2)
Extent	Local (2)	Local (2)	Local (2)	Local (2)
Magnitude	Low (4)	Low (4)	Minor (2)	Minor (2)
Significance	27 (Low to Moderate)	18 (Low)	12 (Low)	6 (Low)
Status (positive or negative)	Negative	Negative	Negative	Positive
Reversibility	Low	Low	Low	Low
Irreplaceable loss of resources?	High	Low	Low	Low
Can impacts be mitigated?	Yes		Yes	
Mitigation:				
<ul style="list-style-type: none"> The entire footprint should avoid the delineated boundaries of watercourses as well as its buffer zones; Effective stormwater and erosion management plans should be in place during both the construction and operational phases. This should also be monitored as part of the EMP; and Appropriate stormwater structures should be in place to control run-off and minimize erosion; and, All no-go areas should be clearly demarcated prior to commencement of construction activities. 				
Cumulative impacts: Low to moderate and could possibly include edge effects to remaining natural vegetation as the footprint activities may result in vegetation clearing. This could lead to increase in sedimentation as well as introduction of alien and invasive species.				
Residual Risks: Expected to be low given that all structures are situated outside the delineated sensitive areas and that stormwater is managed effectively.				

Impacts to sediment

Nature: Change in sedimentation patterns, changes in sediment in watercourses and sub-catchment due to the removal of soil.				
ACTIVITY: Construction activities and maintenance of solar plant would result in earthworks as well as causing soil and vegetation disturbances. Loss of topsoil, sedimentation in rivers that would cause an increase in turbidity. Other potential impacts include; earthworks, clearing of vegetation would result in bare soil that could be washed into the river, erosion, disturbance of slopes through road works next to watercourses.				
	Alternative 1		Alternative 2	
	Without mitigation	With mitigation	Without mitigation	With mitigation
Construction Phase				
Probability	Moderate (3)	Unlikely (2)	Unlikely (2)	Unlikely (2)
Duration	Medium term (3)	Short term (2)	Medium term (3)	Short term (2)
Extent	Local (2)	Local (2)	Local (2)	Local (2)
Magnitude	Low (4)	Low (4)	Low (4)	Minor (2)
Significance	27 (Low to Moderate)	16 (Low)	18 (Low)	12 (Low)
Status (positive or negative)	Negative	Negative	Negative	Negative
Operational Phase				
Probability	Moderate (3)	Unlikely (2)	Unlikely (2)	Rare (1)
Duration	Medium term (3)	Short term (2)	Short term (2)	Short term (2)
Extent	Local (2)	Local (2)	Local (2)	Local (2)
Magnitude	Low (4)	Low (4)	Low (4)	Minor (2)
Significance	27 (Low to Moderate)	16 (Low)	16 (Low)	6 (Low)
Status (positive or negative)	Negative	Negative	Negative	Positive
Reversibility	Low	Moderate	Low	High
Irreplaceable loss of resources?	High	Low	Low	Low
Can impacts be mitigated?	Yes		Yes	
Mitigation:				
<ul style="list-style-type: none"> • Install sediment traps; • Remove topsoil and keep topsoil stockpiles free of any weeds to keep topsoil viable for rehabilitation; • All stockpiles should be safeguarded against rain wash; • Ensure that stockpiles are covered during windy conditions • Remove only vegetation in areas essential for construction; • Excess water flow should be managed efficiently to avoid any impacts on rivers; • Protect all areas susceptible to erosion through installing erosion berms that can prevent gully formation and siltation of watercourses; • Monitor sediment pollution; • All stationary vehicles should be equipped with drip trays; • Avoid parking of vehicles close to any watercourses; • No dumping of waste or any other materials near delineated and buffered areas; and • All areas affected by construction activities should be rehabilitated upon completion of the 				

construction phase. Areas where vegetation was removed, should be reseeded with indigenous grasses as per recommendations from Terrestrial Report.

Cumulative impacts: Low to moderate and could possibly include edge effects to remaining natural vegetation as the footprint activities may result in vegetation clearing. This could lead to increase in sedimentation as well as introduction of alien and invasive species.

Residual Risks: Expected to be low given that all structures are situated outside the delineated sensitive areas and that stormwater is managed effectively.

Introduction and spread of alien and invasive species within watercourses

Nature: Introduction and spread of alien and invasive species.

ACTIVITY: The removal and movement of soil and vegetation could result in opportunistic invasions after such disturbances as well as the introduction of seed in building materials and on vehicles. In addition, invasions of alien vegetation species can have an impact on hydrology through reducing the water quantity entering a watercourse and it can outcompete natural vegetation and therefore decrease natural biodiversity.

	Without mitigation	With mitigation	Without mitigation	With mitigation
Construction Phase				
Probability	Moderate (3)	Moderate (3)	Unlikely (2)	Unlikely (2)
Duration	Long term (4)	Short term (2)	Medium term (3)	Short term (2)
Extent	Regional (3)	Local (2)	Local (2)	Local (2)
Magnitude	Moderate (6)	Low (4)	Low (4)	Low (4)
Significance	39 (Low to Moderate)	24 (Low to Moderate)	18 (Low)	16 (Low)
Status (positive or negative)	Negative	Negative	Negative	Negative
Operational Phase				
Probability	Moderate (3)	Unlikely (2)	Unlikely (2)	Unlikely (2)
Duration	Medium term (3)	Medium term (3)	Medium term (3)	Short term (2)
Extent	Regional (4)	Local (2)	Local (2)	Local (2)
Magnitude	Low (4)	Low (4)	Low (4)	Minor (2)
Significance	33 (Low to Moderate)	18 (Low)	18 (Low)	12 (Low)
Status (positive or negative)	Negative	Negative	Negative	Negative
Reversibility	Low	Moderate	Moderate	Moderate
Irreplaceable loss of resources?	Low	Low	Low	Low
Can impacts be mitigated?	Yes		Yes	
Mitigation:				
<ul style="list-style-type: none"> Monitor for early detection, to find species when they first appear on site. This should be as per the frequency specified in the management plan and should be conducted by an experienced person. Early detection should provide a list of species and locations where they have been 				

<p>detected. Summer (vegetation maximum growth period) is usually the most appropriate time, but monitoring can be adaptable, depending on local conditions – this must be specified in the management plan;</p> <ul style="list-style-type: none"> • Monitor for the effect of management actions on target species, which provides information on the effectiveness of management actions. Such monitoring depends on the management actions taking place. It should take place after each management action; and, • Monitor for the effect of management actions on non-target species and habitats.
<p>Cumulative impacts: Alien and Invasive plant species was readily observed on site, cumulative impacts can be Moderate to High. As such, continuous monitoring should be implemented during the different phases of development and rehabilitation as well as a period after rehabilitation is completed.</p>
<p>Residual Risks: Expected to be limited given that an Alien and Invasive Plant Management Plant forms part of the operational processes of the PV facility.</p>

Activities causing pollution

Nature: Surface water, groundwater and sediment pollution.				
ACTIVITY: Accidental spillages of wet concrete, chemical hazardous substances, oil and diesel spillages may result in surface water, groundwater and sediment pollution.				
	Alternative 1		Alternative 2	
	Without mitigation	With mitigation	Without mitigation	With mitigation
Construction Phase				
Probability	Likely (4)	Unlikely (2)	Moderate (3)	Unlikely (2)
Duration	Medium term (3)	Medium term (3)	Medium term (3)	Short term (2)
Extent	Local (2)	Local (2)	Local (2)	Local (2)
Magnitude	Moderate (6)	Moderate (6)	Moderate (6)	Low (4)
Significance	44 (Moderate)	22 (Low to Moderate)	33 (Low to Moderate)	16 (Low)
Status (positive or negative)	Negative	Negative	Negative	Negative
Operational Phase				
Probability	Likely (4)	Unlikely (2)	Moderate (3)	Unlikely (2)
Duration	Medium term (3)	Short term (2)	Medium term (3)	Short term (2)
Extent	Local (2)	Local (2)	Local (2)	Local (2)
Magnitude	Low (4)	Minor (2)	Low (4)	Minor (2)
Significance	36 (Low to Moderate)	12 (Low)	27 (Low to Moderate)	12 (Low)
Status (positive or negative)	Negative	Negative	Negative	Negative
Reversibility	Low	Moderate	Moderate	Moderate
Irreplaceable loss of resources?	High	Low	Moderate	Low

Can impacts be mitigated?	Yes	Yes
<p>Mitigation:</p> <ul style="list-style-type: none"> • The development footprint should remain outside the delineated rivers, riparian and buffer zones; • Concrete mixing should be done outside the buffer zones and should be done on an impermeable surface; • All stationary vehicles should be equipped with drip trays; • No servicing of vehicles or construction equipment should take place near delineated or buffer areas and should be done on an impermeable surface area; • No washing of construction equipment is allowed in any watercourse; • All hazardous substances should be safely stored on an impermeable surface within the construction site camp; • No ablution facilities should be located within 50 m of watercourses and should be outside the 1:100 year flood line; • Construction camp, storage of construction equipment and materials, and chemicals should be located outside the 1: 100 year flood line; • All waste and refuse should be removed from site and disposed in adequate storage containers before being disposed at a registered landfill site; • All accidental spillages should be rehabilitated immediately and contaminated soil should be adequately disposed off; • No vehicle or construction machinery are allowed within the watercourse; and, • Only use clean water in the washing of the solar panels. 		
<p>Cumulative impacts: Impacted water quality will not only affect local water quality but regional water quality as well. This is considered as a significant cumulative impact.</p>		
<p>Residual Risks: Since pollution can be controlled and to a large extent be prevented, the impact of spillages will have a significant residual impact on local watercourses and as such should be considered a significant residual risk.</p>		

12.13 Terrestrial Ecology

The findings from the Terrestrial Biodiversity Compliance Statement (Human, 2023) follow. The specialist report is contained in **Appendix E2**.

12.13.1 *Impact Description*

Potential impacts were evaluated against the data captured during the desktop and field assessment to identify relevance to the project area. The relevant impacts associated with the proposed construction of the development were then subjected to a prescribed impact assessment methodology and is available on request. The impact assessment was undertaken based on the two alternative layouts provided, and sections were only duplicated where the impact between the two layouts were considered different.

Considering the anthropogenic activities and influences within the landscape, several negative impacts to biodiversity were observed within the project area

These include:

- Agricultural practises;
- Farm roads and main roads (and associated traffic and wildlife road mortalities);

- Grazing and trampling of natural vegetation by livestock;
- Invasive species; and
- Fences and associated maintenance.

Anthropogenic activities drive habitat destruction causing displacement of fauna and flora and possibly direct mortality. Land clearing destroys local wildlife habitat and can lead to the loss of local breeding grounds, nesting/burrowing sites and wildlife movement corridors such as rivers, streams and drainage lines, or other locally important features. The removal of natural vegetation may reduce the habitat available for fauna species and may reduce animal populations and species compositions within the area.

12.13.2 *Impact Assessment*

Impacts to destruction, fragmentation and degradation of habitats and ecosystems

Impact 1	Destruction, fragmentation and degradation of habitats and ecosystems			
Problem	Construction activities will require clearing of natural habitat, to be replaced by the infrastructure. This will result in permanent local loss of habitat. Daily operational activities will permanently damage habitat and fragment it further.			
Type	Direct			
Nature	Negative			
Phases	Construction			
	Alternative 1		Alternative 2	
Criteria	Without mitigation	With mitigation	Without mitigation	With mitigation
Extent	4	3	3	2
Duration	5	5	5	5
Sensitivity	4	3	3	2
Severity	3	2	3	2
Probability	5	5	5	5
Significance	75 High	65 Moderately High	70 High	55 Moderate
Mitigation actions				
Recommendations	1. Restrict impact to development footprint only and limit disturbance in surrounding areas. 2. Prior to commencement of construction, compile a Rehabilitation Plan including monitoring specifications, to be included into the EMPr during final approval. 3. Prior to commencement of construction, compile an Alien Plant Management Plan, to be included into the EMPr during final approval.			
Monitoring				
Recommendations	As per management plans			

Impacts to spread and/or establishment of alien and/or invasive species

Impact 2	Spread and/or establishment of alien and/or invasive species			
Problem	Establishment and continued spread of alien invasive plants due to the clearing and disturbance of indigenous vegetation			
Type	Indirect			
Nature	Negative			
Phases	Construction and Operational			
	Alternative 1		Alternative 2	
Criteria	Without mitigation	With mitigation	Without mitigation	With mitigation
Extent	3	2	3	2
Duration	5	5	5	5
Sensitivity	3	2	2	2
Severity	3	2	3	2
Probability	4	3	4	3
Significance	56 Moderate	33 Low	52 Moderate	33 Low
Mitigation actions				
Recommendations	<p>1. Prior to commencement of construction, compile and implement an alien management plan, which highlights control priorities and areas and provides a programme for long-term control, including monitoring specifications.</p> <p>2. Undertake regular monitoring to detect alien invasions early so that they can be controlled.</p> <p>3. Implement control measures.</p>			
Monitoring				
Recommendations	As per management plans			

Impacts for ongoing displacement and direct mortality of fauna due to disturbance

Impact 3	Ongoing displacement and direct mortality of fauna due to disturbance			
Problem	Mortality of fauna due to higher traffic (Vehicles and staff) on site and disturbances including noise, dust, and vibrations			
Type	Direct			
Nature	Negative			
Phases	Construction and Operational			
	Alternative 1		Alternative 2	
Criteria	Without mitigation	With Mitigation	Without mitigation	With Mitigation
Extent	3	2	3	2
Duration	4	3	4	3
Sensitivity	3	2	2	2
Severity	3	2	3	1

Probability	5	3	4	3
Significance	65 Moderately High	27 Low	48 Moderate	24 Low
Mitigation actions				
Recommendations	Education and awareness of staff and construction personal regarding importance of faunal populations and ecosystem functioning			
Monitoring				
Recommendations	Continued monitoring of faunal populations and awareness programs as per management plan			

Impact for reduced dispersal/migration of fauna

Impact 4	Reduced dispersal/migration of fauna			
Problem	Internal roads, fencing and infrastructure will cut off migratory routes of faunal populations			
Type	Direct			
Nature	Negative			
Phases	Construction and Operational			
	Alternative 1		Alternative 2	
Criteria	Without mitigation	With Mitigation	Without mitigation	With Mitigation
Extent	3	2	2	2
Duration	5	5	5	5
Sensitivity	3	2	2	1
Severity	3	2	3	1
Probability	5	4	5	4
Significance	70 High	44 Moderate	60 Moderate	36 Low
Mitigation actions				
Recommendations	Create corridors during construction phase for faunal species to move through artificial barriers			
Monitoring				
Recommendations	Continuously monitor faunal populations as per management plans			

Impact for environmental pollution

Impact 5	Environmental pollution due to water runoff, spills from vehicles and erosion			
Problem				
Type	Direct and Indirect			
Nature	Negative			
Phases	Construction and Operational			

Criteria	Alternative 1		Alternative 2	
	Without mitigation	With mitigation	Without mitigation	With mitigation
Extent	3	2	4	1
Duration	5	5	5	5
Sensitivity	3	2	4	1
Severity	4	3	4	1
Probability	3	2	3	2
Significance	45 Moderate	24 Low	51 Moderate	16 Very Low
Mitigation actions				
Recommendations	Proper storage of harmful fluids or powders			
Monitoring				
Recommendations	Diligence checks as per storage SOP according to management plans			

Impact for disruption/alteration of ecological life cycles (breeding, migration, feeding) due to noise, dust, and light pollution

Impact 6	Disruption/alteration of ecological life cycles (breeding, migration, feeding) due to noise, dust, and light pollution.			
Problem	Construction and maintenance vehicles moving around on site			
Type	Direct and Indirect			
Nature	Negative			
Phases	Construction and Operational			
	Alternative 1		Alternative 2	
Criteria	Without Mitigation	With Mitigation	Without Mitigation	With Mitigation
Extent	3	2	3	2
Duration	5	3	5	3
Sensitivity	3	2	2	1
Severity	4	3	3	2
Probability	5	5	4	3
Significance	75 High	50 Moderate	52 Moderate	24 Low
Mitigation actions				
Recommendations	Keep within footprint, drive within speed limits, do not idle vehicle for unnecessary periods			
Monitoring				
Recommendations	Follow SOP's as set out in Management plan, monitor faunal populations			

Impact for staff and others interacting directly with fauna (potentially dangerous) and flora or poaching of animals and plants

Impact 7	Staff and others interacting directly with fauna (potentially dangerous) and flora or poaching of animals and plants			
Problem	Staff interacting/ killing/ poaching fauna or flora species			
Type	Direct			
Nature	Negative			
Phases	Construction and Operational			
	Alternative 1		Alternative 2	
Criteria	Without mitigation	With mitigation	Without mitigation	With mitigation
Extent	3	2	3	1
Duration	5	5	5	5
Sensitivity	4	2	3	1
Severity	4	2	3	1
Probability	4	3	4	3
Significance	64 Moderate	33 Low	52 Moderate	24 Low
Mitigation actions				
Recommendations	Awareness training for staff on site regarding sensitive fauna and flora species, including relevant laws for protection of species			
Monitoring				
Recommendations	Monitoring of area for snares and disturbed soil (plant poaching), monitoring of personal effects of staff			

The following mitigation measures are recommended to address potential impacts:

12.13.2.1 Vegetation and habitats

The following mitigation measures are recommended to address known potential impacts:

- Areas of indigenous vegetation, even secondary communities outside of the direct project footprint, should under no circumstances be fragmented or disturbed further. Clearing of vegetation should be minimized and avoided where possible. All activities must be restricted within the low/medium sensitivity areas. No further loss of high sensitivity areas should be permitted. It is recommended that areas to be developed be specifically demarcated so that during the construction phase, only the demarcated areas be impacted upon.
- If high sensitivity cannot be avoided, the necessary permits must be obtained to destroy, rescue, or relocate plants. For each protected plant destroyed, another individual must be propagated and replanted in a suitable area to mitigate the loss.
- For each protected plant destroyed, another individual must be propagated and replanted in a suitable area to mitigate the loss.
- The large mature protected trees (Shepard's tree) should be marked and a buffer of 5m from the furthest extent of the canopy should be used so as not to damage these specimens, or the necessary destruction permits must be obtained and an individual for each destroyed plant must be propagated and replanted in a suitable habitat to mitigate loss.
- Existing access routes, especially roads must be made use of

- All laydown, chemical toilets etc. should be restricted to medium/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 phase has been concluded. No storage of vehicles or equipment will be allowed outside of the designated project areas.
- Areas that are denuded during construction need to be re-vegetated with indigenous vegetation to prevent erosion during flood and wind events. This will also reduce the likelihood of encroachment by alien invasive plant species. All livestock must always be kept out of the project area, especially areas that have been recently revegetated.
- 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 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. Construction activities and vehicles could cause spillages of lubricants, fuels and waste material potentially negatively affecting the functioning of the ecosystem. All vehicles and equipment must be maintained, and all re-fuelling and servicing of equipment is to take place in demarcated areas outside of the project area.
- 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.
- Any individual of the protected plants that are present needs a relocation or destruction permit in order for any individual that may be removed or destroyed due to the development. High visibility flags must be placed near any threatened/protected plants in order to avoid any damage or destruction of these specimens.
- Infrastructure, development areas and routes where protected plants cannot be avoided, these plants mainly being succulents should be removed from the soil and relocated/ re-planted in similar habitats where they should be able to resprout and flourish again.
- A fire management plan needs to be compiled and implemented to restrict the impact fire might have on the surrounding areas.
- 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.
- Restrict impact to development footprint only and limit disturbance in surrounding areas.
- Prior to commencement of construction, compile a Rehabilitation Plan including monitoring specifications, to be included into the EMPr during final approval.
- Prior to commencement of construction, compile an Alien Plant Management Plan, to be included into the EMPr during final approval.
- Prior to commencement of construction, compile and implement an alien management plan, which highlights control priorities and areas and provides a programme for long-term control, including monitoring specifications.
- Undertake regular monitoring to detect alien invasions early so that they can be controlled.
- Prior to commencement of construction, compile and implement a stormwater management plan including monitoring specifications.
- Monitor surfaces for erosion, repair and/or upgrade, where necessary.

- Prior to decommissioning commencing, compile a Rehabilitation Plan in compliance with the regulatory requirements at the time of decommissioning.

12.13.2.2 Fauna

- 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. 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. 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.
- Outside lighting should be designed and limited to minimize impacts on fauna. 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 (30km/h) must still be enforced to ensure that road killings and erosion is limited.
- 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.
- 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. Fluorescent and mercury vapor lighting should be avoided, and sodium vapor (green/red) lights should be used wherever possible.
- 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 (30km/h) must still be enforced to ensure that road killings and erosion is limited.
- All areas to be developed must be walked through prior to any activity to ensure no nests or fauna species are found in the area. Should any Species of Conservation Concern not move out of the area, or their nest be found in the area a suitably qualified specialist must be consulted to advise on the correct actions to be taken
- Any holes/deep excavations must be dug and planted in a progressive manner and shouldn't be left open overnight;
 - Should the holes be left open overnight they must be covered temporarily to ensure no small fauna species fall in.
- Ensure that cables and connections are insulated successfully to reduce electrocution risk
- Any exposed parts must be covered (insulated) to reduce electrocution risk.
- Heat generated from the substations must be monitored to ensure it does not negatively affect the local fauna
- Use environmentally friendly cleaning and dust suppressant products

- Fencing mitigations:
 - Wildlife-permeable fencing with holes large enough for mongoose and other smaller mammals should be installed every 50 m along the fence (with a size of 30 x 20 cm), 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.

12.13.2.3 Alien Species

- 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. Footprint of the roads must be kept to prescribed widths.
- 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.

12.13.2.4 Dust

- Dust-reducing mitigation measures must be put in place and must be 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

12.13.2.5 Waste Management

- Waste management must be a priority and all waste must be collected and stored effectively
- Litter, spills, fuels, chemicals and human waste in and around the project area
- A minimum of one toilet must be provided per 15 persons. Portable toilets must be pumped dry to ensure the system does not degrade over time and spill into the surrounding area. Chemical toilets must be serviced regularly to avoid spill over and eutrophication of the soil by urea and or nitrates.
- 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
- Where a registered disposal facility is not available close to the project area, the Contractor shall provide a method statement with regard to waste management. 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.

12.13.2.6 Environmental Awareness Training

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. 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 protected species, their identification, conservation status and importance, biology, habitat

requirements and management requirements as within the Environmental Authorisation 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.

12.13.2.7 Erosion

- Speed limits must be put in place to reduce erosion.
 - Reducing the dust generated by the listed activities above, especially the earth moving machinery, through wetting the soil surface and putting up signs to enforce speed limit as well as 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.

12.14 Avifauna

A separate Avifaunal Baseline and Impact Assessment (Buys, 2023) was undertaken and the findings from this study follow. The specialist report is contained in **Appendix E3**.

12.14.1 *Impact Description*

In consideration that there are anthropogenic activities and influences present within the landscape, there are currently several negative impacts to biodiversity, including avifauna. These include:

- Historic land modification largely in the form of road and powerline infrastructure, and the associated land clearing and edge effects;
- Livestock grazing;
- Minor and major gravel roads (and associated vehicle traffic and the possibility of wildlife road mortalities);
- Invasive Alien Plant infestations; and
- Fences and the associated infrastructure.

During the construction phase vegetation clearing for the associated infrastructure will lead to direct habitat loss. Vegetation clearing will create a disturbance and will therefore potentially lead to the displacement of avifaunal species. The operation of construction machinery on site will generate noise pollution. Increased human presence can lead to poaching and the increase in vehicle traffic and heavy machinery will potentially lead to roadkill.

The principal impacts of the operational phase are electrocution, collisions, fencing, chemical pollution due to chemical cleaning of the PV panels and habitat loss. Solar panels have been implicated as a potential risk for bird collisions. Collisions are thought to arise when birds (particularly waterbirds) mistake the panels for waterbodies, known as the “lake effect” (Lovich & Ennen, 2011), or when migrating or dispersing birds become disorientated by the polarised light reflected by the panels. This “lake-effect” hypothesis has not been substantiated or refuted to date (Visser et al, 2019). It can however be said that the combination of power lines, fencing and large infrastructure will influence avifauna species. Visser et al (2019) performed a study at a utility-scale PV SEF in the Northern Cape and found that most of the species affected by the facility were passerine species. This is due to collisions with solar panels from underneath. During a predator attack while foraging under the panels, individuals may alight and then collide with the panel. Larger species were said to be more influenced by the facilities when they were found foraging close by and were disturbed by predators which resulted in collisions with infrastructure.

Large passerines are particularly susceptible to electrocution because owing to their relatively large bodies, they are able to touch conductors and ground/earth wires or earthed devices simultaneously. The chances of electrocution are increased when feathers are wet, during periods of high humidity or during defecation. Prevailing wind direction also influences the rate of electrocution casualties.

Fencing of the PV site can influence birds in six ways (BirdLife South Africa, 2015):

- Snagging – occurs when a body part is impaled on one or more barbs or razor points of a fence;
- Snaring – when a bird’s foot/leg becomes trapped between two overlapping wires;
- Impact injuries – birds flying into a fence, the impact may kill or injure the bird;

- Snarling – when birds try and push through a mesh or wire stands, ultimately becoming trapped (uncommon);
- Electrocutation – electrified fence can kill or severely injure birds; and
- Barrier effect – fences may limit flightless birds including moulting waterfowl from resources.

Chemical pollution from PV cleaning, if not environmentally friendly will result in either acute or chronic affects. Should this chemical penetrate into the surrounding environment, it would impact populations on a larger scale and not just species found in and around the PV footprint.

Two alternatives were considered for the project however, the impacts associated with avifauna remain the same for both alternatives.

12.14.2 Impact Assessment

12.14.3 Construction Phase

12.14.3.1 Impact for Habitat destruction within the project footprint

Prior to mitigation (original Design)					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
5	3	4	3	5	
Permanent	Local area/ within 1 km of the site boundary / < 5000ha impacted / Linear features affected < 1000m	Great / harmful/ ecosystem structure and function largely altered	Ecology moderately sensitive/ /important	Definite	Moderately High
Post mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
4	2	4	3	4	
Life of operation or less than 20 years: Long Term	Development specific/ within the site boundary / < 100 ha impacted / Linear features affected < 100m	Great / harmful/ ecosystem structure and function largely altered	Ecology moderately sensitive/ /important sensitive /important	Highly likely	Moderate

Mitigation Actions:

- 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. Concrete/cement mixed on site must be mixed in a bunded area at least 50 m away from any water resources . 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; and
- Environmental Officer (EO) to provide supervision and oversight of vegetation clearing activities.

12.14.3.2 Impact for destruction, degradation and fragmentation of surrounding habitats

Prior to mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
4	3	3	3	4	
Life of operation or less than 20 years: Long Term	Local area/ within 1 km of the site boundary / < 5000ha impacted / Linear features affected < 1000m	Significant / ecosystem structure and function moderately altered	Ecology moderately sensitive/ /important	Highly likely	Moderate
Post mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
3	2	2	3	3	
One year to five years: Medium Term	Development specific/ within the site boundary / < 100 ha impacted / Linear features affected < 100m	Small / ecosystem structure and function largely unchanged	Ecology moderately sensitive/ /important	Likely	Low

Mitigation Actions:

- 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 a Solid Waste Management Plan. Recycling is encouraged;
- All construction activities and roads to be within the clearly defined and demarcated areas;
- Temporary laydown areas should be clearly demarcated and rehabilitated with indigenous vegetation 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;
- Cement mixed on site must be mixed in a bunded area or on a removable surface such as thick plastic sheeting at least 50 m away from any wetlands or water resources; and
- 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.

12.14.3.3 Impact for displacement/emigration of avifauna community (including SCC) due to noise pollution

Prior to mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
4	3	3	3	4	
Life of operation or less than 20 years: Long Term	Local area/ within 1 km of the site boundary / < 5000ha impacted / Linear features affected < 1000m	Significant / ecosystem structure and function moderately altered ecosystem structure and function largely altered	Ecology moderately sensitive/ /important	Highly likely	Moderate
Post mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
3	2	2	3	3	
One year to five years:	Development specific/ within the site boundary / <	Small / ecosystem structure and	Ecology moderately sensitive/ /important	Likely	Low

Medium Term	100 ha impacted / Linear features affected < 100m	function largely unchanged			
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Mitigation Actions:

- No construction activity is to occur at night, as nocturnal species are highly dependent on sound and/or vocalisations for behavioural processes;
- All vehicles speed must be restricted to 20 km/h, to reduce the noise emitted by them; and
- If generators are to be used these must be soundproofed.

12.14.3.4

12.14.3.5 Direct mortality from persecution or poaching of avifauna species and collection of eggs

Impact for poaching avifauna species

There is the possibility of construction staff poaching avifauna species and collecting eggs from the project footprint and proximal surrounding area. There is also the possibility of persecution of species that are deemed as negative in folklore.

Prior to mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
4	3	3	3	4	
Life of operation or less than 20 years: Long Term	Local area/ within 1 km of the site boundary / < 5000ha impacted / Linear features affected < 1000m	Local area/ within 1 km of the site boundary / < 5000ha impacted / Linear features affected < 1000m	Ecology moderately sensitive/ /important	Highly likely	Moderate
Post mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
2	2	2	3	3	
One month to one year: Short Term	Development specific/ within the site boundary / < 100 ha impacted / Linear features affected < 100m	Small / ecosystem structure and function largely unchanged	Ecology moderately sensitive/ /important	Likely	Low

Mitigation Actions:

- 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; and
- 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.

12.14.3.6

12.14.3.7 Impact for direct mortality from increased vehicle and heavy machinery traffic

The increased vehicle and heavy machinery traffic associated with construction activities will lead to roadkill.

Prior to mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
4	3	3	3	4	
Life of operation or less than 20 years: Long Term	Local area/ within 1 km of the site boundary / < 5000ha impacted / Linear features affected < 1000m	Significant / ecosystem structure and function moderately altered	Ecology moderately sensitive/ /important	Highly likely	Moderate
Post mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
2	2	2	3	1	
One month to one year: Short Term	Development specific/ within the site boundary / < 100 ha impacted / Linear features affected < 100m	Small / ecosystem structure and function largely unchanged	Ecology moderately sensitive/ /important	Highly unlikely	Absent

Mitigation Actions:

- All personnel should undergo environmental induction with regards to awareness about speed limits and roadkill; and
- All construction vehicles should adhere to a speed limit of maximum 20 km/h to avoid collisions. Appropriate speed control measures and signs must be erected.

12.14.4 Operational Phase

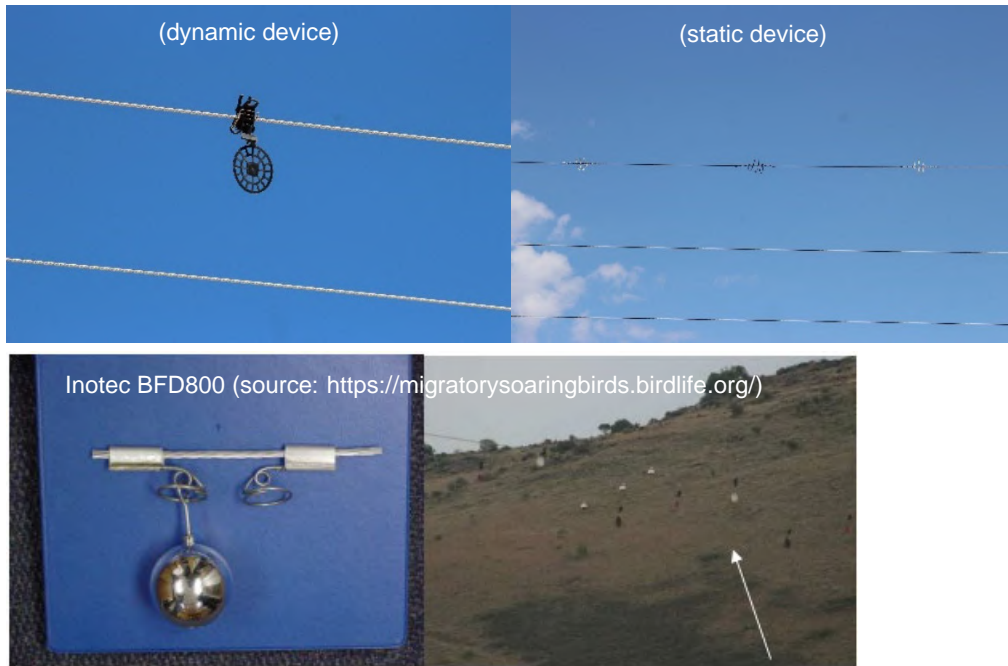
12.14.4.1 Impact for collisions with infrastructure associated with the PV Facility and powerlines

The proposed project comprises of components that pose a collision risk to avifauna species. This includes collisions with PV panels, connection infrastructure, powerlines and fences.

Prior to mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
5	2	4	3	4	
Permanent	Development specific/ within the site boundary / < 100 ha impacted / Linear features affected < 100m	Great / harmful/ ecosystem structure and function largely altered	Ecology moderately sensitive/ /important	Highly likely	Moderately High
Post mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
4	2	3	3	4	
Life of operation or less than 20 years: Long Term	Development specific/ within the site boundary / < 100 ha impacted / Linear features affected < 100m	Significant / ecosystem structure and function moderately altered	Ecology moderately sensitive/ /important	Highly likely	Moderate

Mitigation Actions:

- 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;
- Post-construction monitoring should be undertaken in accordance with the BirdLife South Africa best practice guidelines for solar energy facilities (BirdLife South Africa, 2017). If monitoring results indicate that excessive bird fatalities are occurring, then adaptive mitigations should be implemented. These should be discussed with avifaunal specialist and ECO prior to implementation and could include the retrofitting/incorporation of additional visual cues/diverters to existing PV panels/infrastructure;
- The air space used by the gridlines must be minimised by burying them where possible;
- Overhead cables/lines across water resource areas 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;
 - Routinely retention loose wires;
 - Minimum distance between wires is 300 mm; and
 - Place markers on fences.

12.14.4.2 Electrocutation due to infrastructure associated with the PV Facility

Prior to mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
5	2	3	3	4	
Permanent	Development specific/ within the site boundary / < 100 ha impacted / Linear features affected < 100m	Significant / ecosystem structure and function moderately altered	Ecology moderately sensitive/ /important	Highly likely	Moderately High
Post mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
4	2	3	3	2	
				Possible	Low

Life of operation or less than 20 years: Long Term	Development specific/ within the site boundary / < 100 ha impacted / Linear features affected < 100m	Significant / ecosystem structure and function moderately altered	Ecology moderately sensitive/ /important		
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Mitigation Actions:

- 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 contact protection to birds. It is best to use suspended insulators and vertical disconnectors, if upright insulators or horizontal disconnectors are present, these should be covered; and
- 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).

12.14.4.3

12.14.4.4 Impact for direct mortality from roadkills, persecution or poaching of avifauna species and collection of eggs

There is the possibility of operational staff poaching avifauna species and collecting eggs from the project footprint and proximal surrounding area. There is also the possibility of persecution of species that are deemed as negative in folklore.

Prior to mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
4	3	3	3	3	
Life of operation or less than 20 years: Long Term	Local area/ within 1 km of the site boundary / < 5000ha impacted / Linear features affected < 1000m	Significant / ecosystem structure and function moderately altered	Ecology moderately sensitive/ /important	Likely	Moderate
Post mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
4	2	2	3	2	
Life of operation or less than 20	Development specific/ within the site boundary / < 100 ha	Small / ecosystem structure and	Ecology moderately	Possible	Low

years: Long Term	impacted / Linear features affected < 100m	function largely unchanged	sensitive/ /important	
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Mitigation Actions:

- All personnel should undergo environmental awareness training that includes educating on not poaching/persecuting avifauna species and collecting eggs.
- Signs must be put up to enforce this, should someone be caught a R1000 fine must be enforced;
- All personnel should undergo environmental induction with regards to awareness about speed limits and roadkill; and
- All vehicles should adhere to a speed limit of maximum 20 km/h to avoid collisions. Appropriate speed control measures and signs must be erected.

12.14.4.5 Impact on pollution of water sources and surrounding habitat due to cleaning products of the PV panels.

Prior to mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
4	3	3	3	3	
Life of operation or less than 20 years: Long Term	Local area/ within 1 km of the site boundary / < 500ha impacted / Linear features affected < 1000m	Significant / ecosystem structure and function moderately altered	Ecology moderately sensitive/ /important	Likely	Moderate
Post mitigation					
Duration of Impact	Spatial Scope	Severity of Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance
4	2	2	3	3	
Life of operation or less than 20 years: Long Term	Development specific/ within the site boundary / < 100 ha impacted / Linear features affected < 100m	Small / ecosystem structure and function largely unchanged	Ecology moderately sensitive/ /important	Likely	Low

Mitigation Actions:

- Only environmentally friendly chemicals are to be used for cleaning of the panels.

12.15 Agriculture

The findings from the Agricultural Compliance Statement (Gouws, 2023) follow. The specialist report is contained in **Appendix E4**.

12.15.1 *Impact Description*

Loss Of High Potential Land

There will not be permanent loss of high potential land. According to the guidelines of various publications of DALRRD that deals with land capability and crop yield, the land is not high potential. There is also no irrigated land on the property which has to be protected.

Further, the PV infrastructure does not alter the soil properties or land conditions and once removed will be suitable for farming.

- The impact is low, temporary and totally reversable.

Loss Of Agricultural Production

The livestock carrying capacity at a stocking density of 10ha/LSU, is approximately 44 LSU (medium frame animals is a weaner production system). The projected enterprise income is R 310 332 or R25 861/month. Game prices are highly variable and is not normally a good input to calculate income. Game on the site are also bulk grazers. Therefore, by using the available LSUs game will automatically also be brought into the calculation for income.

The grazing opportunity that the farm provides cannot be replaced or mitigated on a national level. As far as the farmer is concerned, the remaining land on the farm can accommodate a part of the 44 animals that would have used the land to be placed under PV.

Our national electricity problems far outweigh the loss of income that the farm will sacrifice.

- The impact is low on a regional or national scale
- Is temporary and will be for the medium term.
- Mitigation is achieved by increasing the stocking rate of the remaining land.

Loss of Agricultural Infrastructure

The cattle handling facilities located on the land proposed for the development will be moved to a new position on the remaining part of the farm.

- In conclusion, no agricultural infrastructure will be lost.
- The impact is low, temporary and reversable.
- Mitigation is achieved by moving the infrastructure to where it is needed on other parts of the farm.

Loss of soil due to Erosion

The soil is well-drained with moderately developed structure. It is also on evenly sloped land where erosion is not expected.

Nevertheless, the PV projects creates areas that are cleared of vegetation, and that could be subject to erosion. Runoff from hard surfaces should be dealt with by a Stormwater Management Plan (SMP). This is an engineering function and is normally addressed as part of the project design.

- No impact is expected
- Mitigation is achieved by allowing grass to re-establish after construction and by guidelines in the SWMP.

12.15.2 Impact Assessment

According to the Protocol for the specialist assessment and minimum report content requirements for environmental impacts on Agriculture (GN No. 320 of 20 March 2020), a Compliance Statement was prepared for the Project. This compliance statement does not include a quantitative assessment of the potential impacts to Agriculture.

The screening tool evaluation in the case of this property is incorrect. The fields indicated were never planted with crops, but in order to improve the veld grazing, it was de-bushed and planted to pastures. There is no land that can be considered as high potential land, this is mainly due to the adverse climatic conditions that makes rainfed crop production unprofitable. As a result, the land was found to be moderately sensitive regarding rainfed crop farming and not highly sensitive as indicated by the screening tool. There is also no irrigated land that should be protected.

The livestock carrying capacity at a stocking density of 10ha/LSU, is approximately 44 LSU (medium frame animals in a weaner production system). The projected enterprise income is R 310 332 or R25 861/month. The impact of the development on farming as an enterprise is low on a regional or national scale. It is also temporary and will be for the medium term or for the lifespan of the project. The cattle handling facilities located on the land proposed for the development will be moved to a new position on the remaining portion. In conclusion, no agricultural infrastructure will be lost. The soil is well-drained with moderately developed structure. It is also on evenly sloped land where erosion is not expected. Nevertheless, the PV projects create areas that are cleared of vegetation, and that could be subject to erosion. Runoff from hard surfaces should be dealt with by a Stormwater Management Plan.

No impact is expected, but mitigation can be achieved by allowing grass to re-establish under the PV panels after construction.

12.16 Cultural Heritage

The findings from the Phase 1 Cultural Heritage Impact Assessment (Kitto, 2023) follow. The specialist report is contained in **Appendix E5**.

12.16.1 *Impact for Planning and Construction*

Although the historical topographical maps indicated one heritage feature on the boundary of the eastern section of the project area, no heritage resources were identified within or adjacent to the project footprint area during the site survey. Therefore, low impacts on heritage resources are anticipated for both the Alternative 1 and Alternative 2 layout.

Environmental Feature		Chance finds: Heritage resources - Unidentified graves or archaeological material				
Project life-cycle		Planning, Construction				
Potential Impact		Proposed Management Objectives / Mitigation Measures				
Possible damage to or destruction of unidentified archaeological material		If any changes are made to the final design footprint prior to construction, monitoring of site clearance activities must be undertaken by a heritage specialist/archaeologist to identify any archaeological sites or material				
Possible damage to or destruction of unidentified graves or burials		If any changes are made to the final design footprint prior to construction, monitoring of site clearance activities must be undertaken by a heritage specialist/ archaeologist to identify any graves/burials				
Alternative 1	Nature	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	Negative	Local	High	Permanent	Remote	1
After Mitigation	Negative	Local	High	Long- term	Remote	1
Significance of Impact and Preferred Alternatives	No visible heritage resources were identified within the project area for Alternative 1. However, there is a remote possibility that unidentified graves/burials or archaeological material could be uncovered during site clearing or construction activities.					
Alternative 2	Nature	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	Negative	Local	High	Permanent	Remote	1
After Mitigation	Negative	Local	High	Long- term	Remote	1
Significance of Impact and Preferred Alternatives	No visible heritage resources were identified within the project area for Alternative 2. However, there is a remote possibility that unidentified graves/burials or archaeological material could be uncovered during site clearing or construction activities.					

12.17 Palaeontology

The findings from the Palaeontological Impact Assessment (Butler, 2023) follow. The specialist report is contained in **Appendix E6**.

12.17.1 *Impact Description*

A medium Palaeontological Significance has been allocated for the construction phase of the PV development pre-mitigation and a low significance post mitigation. The construction phase will be the only development phase impacting Palaeontological Heritage and no significant impacts are expected to impact the Operational and Decommissioning phases. As the No-Go Alternative considers the option of 'do nothing' and maintaining the status quo, it will have a Neutral impact on the Palaeontological Heritage of the development. 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. It is consequently recommended that no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.

If fossil remains are discovered during any phase of construction, either on the surface or exposed by excavations the ECO/site manager in charge of these developments must be alerted immediately.

12.17.2 *Impact Assessment*

The impact assessment shown in **the tables** below were extracted from the PIA (Butler, 2023). Please refer to the PIA under Appendix E of the EIA Report in order to view the impact assessment methodology. A summary of the impact assessment is included below.

Impact: <i>Loss of Fossil Heritage in or above ground surface</i>							
Impacts	Extent	Duration	Magnitude	Reversibility	Irreplaceable loss	Cumulative effect	Impact
Pre-mitigation	Site (1)	Possible (2)	Permanent (4)	High (2)	Irreversible 4	Significant loss of resources 2	Low (2)
Post mitigation	Site (1)	Possible (2)	Permanent (4)	Low (1)	Irreversible (4)	Significant loss of resources (1)	Low (2)

12.18 Visual Quality

The findings from the Visual Impact Assessment (Andre, 2023) follow. The specialist report is contained in **Appendix E8**.

12.18.1 *Impact Description*

The nature of the visual impacts will be the visual effect that the activity would have on the receiving environment. These visual impacts would be:

- ❑ The construction and operation (see **Table 31 and 32**) of the proposed PV facility and its associated infrastructure may have a visual impact on the study area, especially within (but not restricted to) a 1 - 5km radius of the proposed facility. The visual impact will differ amongst places, depending on the distance from the facility.
- ❑ Visibility from sensitive receptors. The proposed development will be visible from receptors outside the proposed project area. These include:
 - Site personnel at the operation;
 - People travelling to work and commercial activities in the surrounding areas;
 - People travelling on the surrounding access routes to their place of residence;
 - Surrounding farming communities; and
 - Surrounding residential areas.

When considering the viewshed analysis, the visibility rating is **moderate** (theoretical visibility of project elements between a quarter and half of the study area).

Given that the study area has a moderate VAC (due to vegetation and the flat to gentle landscape) and **moderate** visual resource value, the proposed project will have a moderate (without mitigation measures) visual intrusion on surrounding sensitive receptors. Ensuring that vegetation is retained on the periphery of these areas, and wherever possible, lights be directed downwards as to avoid illuminating the sky and limit the reflection from the solar panels, the visual impact on the surrounding environment will be **moderate** depending on the proximity to the sensitive receptors.

12.18.2 *Impact Assessment*

The differences between the two (2) alternatives are negligible from a visual perspective resulting in the impact assessment being similar. Therefore, the impact assessment below is for both alternatives.

Table 31: Construction phase visual impact assessment (Buys, 2023)

Phase	Potential Visual Impacts	Visual Significance											
		Before Mitigation						After Mitigation					
		M	D	S	P	SP	RATING	M	D	S	P	SP	RATING
Construction	Site establishment <ul style="list-style-type: none"> This will involve the vegetation clearance and stripping of soil in areas designated for surface infrastructure. 	6	2	3	3	33	Medium	6	2	3	2	22	Low
	Site Clearing of the project footprint: <ul style="list-style-type: none"> Removal of vegetation leading to increased visual contrast and loss of VAC and increase visual intrusion on sensitive receptors. Alteration of current landscape features impacting on landscape character and sense of place. 	6	2	3	4	44	Medium	6	2	3	2	22	Low
	Construction of Solar PV facility and associated infrastructure.	6	2	3	4	44	Medium	6	2	3	2	22	Low
	Construction vehicle movement and increased human activity in and around the proposed site.	6	2	3	2	22	Low	6	2	3	1	11	Low
	General and hazardous waste management.	2	2	2	2	12	Low	2	2	2	1	6	Low
	Formation of dust plumes because of construction activities.	4	2	3	2	18	Low	4	2	3	1	9	Low
	Use of security lighting.	4	2	2	2	16	Low	4	2	2	1	8	Low
	Topographical alteration which will lead to increased visual intrusion and potential impact on sense of place.	6	2	3	4	44	Medium	6	2	3	2	22	Low

Table 32: Operational phase visual impact assessment (Buys, 2023)

Phase	Potential Visual Impacts	Visual Significance											
		Before Mitigation						After Mitigation					
		M	D	S	P	SP	RATING	M	D	S	P	SP	RATING
Operational	Topographical alteration which will lead to increased visual intrusion and potential impact on sense of place.	6	4	3	4	52	Medium	6	4	3	2	26	Low
	Increased vehicle and human activity in and around the Solar PV facility and associated infrastructure.	6	4	3	2	26	Low	6	4	3	1	13	Low
	Night-time illumination due to security lighting and lighting associated with the Solar PV facility and associated infrastructure.	6	4	2	3	36	Medium	6	4	2	2	24	Low
	Potential visual impact of solar glint and glare as a visual distraction.	6	4	3	3	39	Medium	6	4	3	2	26	Low

Table 33: Decommissioning phase visual impact assessment (Buys, 2023)

Phase	Potential Visual Impacts	Visual Significance											
		Before Mitigation						After Mitigation					
		M	D	S	P	SP	RATING	M	D	S	P	SP	RATING
Decommissioning	General decommissioning and closure activities leading to visual intrusion on sensitive receptors.	6	1	3	2	20	Low	6	1	2	2	14	Low
	Dismantling and removal Solar PV facility and associated infrastructure.	6	1	3	1	10	Low	6	1	2	1	7	Low
	Cleaning, landscaping, and replacement of soils over the disturbed area.	6	1	3	1	10	Low	6	1	2	1	7	Low
	Waste generation and disposal	4	1	2	2	14	Low	4	1	2	1	7	Low
	Ineffective rehabilitation leading to landscape scarring, permanent visual contrast and a permanent alteration of the landscape character and sense of place.	6	4	3	3	39	Medium	6	1	2	3	21	Low

As there are certain visual impacts from the proposed solar development project, mitigation measures have been developed and are provided within this section.

Visual mitigation can be divided into two (2) options. Typically using a combination of the two (2) options is most effective. The first option is an attempt to "hide" the source of the visual impact from view, by placing visually appealing elements between the viewer and the source of the visual impact. The second option aims to minimise the severity of the visual impact itself. This can be achieved in numerous ways for example limiting heights or by blending the infrastructure to match the surrounding environment.

During the construction phase, the following mitigation measures should be implemented to minimise the visual impact.

General site management:

- Maintain the construction site in a neat and orderly condition at all times;
- Plan the placement of lay-down areas and any potential temporary construction camps in order to minimise vegetation clearing;
- Ensure that rubble, litter, and disused construction materials are managed and removed regularly; and
- Ensure that all infrastructure and the site and general surroundings are maintained in a neat and appealing way.

Height and Orientation:

- The height and orientation of the solar panels should be considered during the design phase. Panels should be oriented to minimize glare and reflection, and their height should be kept as low as possible to reduce their visual impact.
- Infrastructure:
 - All constructed facilities and buildings should cause minimum visual disturbance by reducing the contrast and blending in with the surrounding vegetated natural area. This could be achieved by painting rooftops and walls of buildings in the hues and tones of the surrounding vegetation and/or by adding matt paints to highly reflective surfaces, as well as sharp protruding features on the structures. All of these solutions are subject to the technical design of individual buildings and facilities and should be pursued by the technical design and/or construction team, taking into consideration added value from reduced visibility, engineering feasibility and cost.
 - Enhancing the natural landscape of the area around the proposed development with moderate height indigenous trees to hide the buildings and infrastructure.
- Dust Management:
 - Implement dust suppression using a water cart to minimise airborne dust;
 - Enforce a 50 km/h speed limit on-site for Light-Duty Vehicles and a 40 km/h speed limit for large construction vehicles and machinery.

During the operational phase the following mitigation measures should be implemented to minimise the visual impact.

- Light pollution management:
 - Plan the lighting requirements of the facilities to ensure that lighting meets the need to keep the site secure and safe, without resulting in excessive illumination.
 - Avoid up-lighting of structures by rather directing lighting downwards and focusing on the area to be illuminated.

- Reduce the height and angle of illumination from which floodlights are fixed as much as possible while still maintaining the required levels of illumination.
 - Lighting should be shielded in areas where specific objects are to be illuminated.
 - Minimise the use of lighting, where possible.
 - Lighting should exclude the blue-rich wavelengths and be closer to the red-rich wavelength spectrum.
 - Globes used in lighting outside areas should be warm white. This also applies to light spilling out from within buildings. A colour temperature of no more than 3000 Kelvins is recommended for lighting.
 - Light intensity of illuminating lights should be limited as far as possible, i.e., to limit lighting to areas required to serve operational functionality.
 - Illumination where not permanently required should be fitted with timers, motion-activated sensors or be dimmable to reduce total light emitted.
- Site management
 - Shape any slopes and embankments to a maximum gradient of 1:4 and vegetate, to prevent erosion and
 - improve their appearance.
 - Utilise vegetation screens where possible, as visual screening devices around the proposed project, specifically buildings.
 - Plant indigenous trees in landscaped areas where possible, as well as around the solar PV facility and associated infrastructure.
 - Eradicate invasive alien plant species.

During decommissioning and closure phase, the following mitigation measures should be implemented to minimise the visual impact:

- Eradicate invasive alien plant species;
- Remove all built infrastructure; and
- Re-shape all footprint areas to be as natural in appearance as possible and revegetate using locally occurring
- vegetation.

12.19 Air Quality

12.19.1 *Impact Description*

Sensitive receptors to dust and other air quality impacts in the study area include people residing in the surrounding rural areas, agricultural activities, and ecological features (fauna and flora).

The Project proposes the use of a renewable resource (solar), which is a cleaner form of energy generation than using fossil fuels, with environmental benefits.

Sources of air quality impacts associated with the Project may include:

- ☐ Construction phase –
 - Dust from the use of dirt roads by construction vehicles;
 - Dust from bare areas that have been cleared for construction purposes; and

- Emissions from construction equipment and machinery.
- Operational phase –
 - Impacts to air quality caused by the operation and maintenance of the facility include dust from the use of dirt roads and tailpipe emissions from vehicles.

Mitigation measures are included in the EMPr to ensure that the air quality impacts during the construction phase are suitably monitored and managed and that regulated thresholds are not exceeded. The EMPr also includes measures to control and minimize greenhouse gas emissions by optimising the utilisation of construction resources, as well as preventing fires related to construction activities.

During the operational phase of the Solar PV Plant, local atmospheric pollution may reduce the irradiation received or contain significant levels of airborne corrosive substances. The efficiency of the solar plants be also reduced if the modules are soiled (covered) by particulates/dust.

12.19.2 *Impact Assessment*

Environmental Feature	Air Quality
Relevant Alternatives & Activities	Construction domain of development footprint
Project life-cycle	Construction phase
Potential Aspects & Impacts	Proposed Management Objectives / Mitigation Measures
<ul style="list-style-type: none"> • Excessive dust levels as a result of construction activities. • Emissions from construction equipment and machinery. 	<ul style="list-style-type: none"> ○ Appropriate dust suppression measures or temporary stabilising mechanisms to be used when dust generation is unavoidable (e.g., dampening with water, chemical soil binders, straw, brush packs, chipping), particularly during prolonged periods of dry weather. Dust suppression to be undertaken for all bare areas, including construction area and access roads. Note that all dust suppression requirements should be based on the results from the dust monitoring and the proximity of sensitive receptors. ○ Speed limits to be strictly adhered to. ○ All vehicles and machinery used at the site are to be in good working condition and fitted with appropriate emission controls ○ Construction plant to be operated efficiently and turned off when not in use.

	+/- Impacts	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	-	local	medium	short-term	likely	3
After Mitigation	-	local	low	short-term	unlikely	1

Environmental Feature	Air Quality
Relevant Alternatives & Activities	Operation of the Solar PV Plant
Project life-cycle	Operational phase
Potential Aspects & Impacts	Proposed Management Objectives / Mitigation Measures

<ul style="list-style-type: none"> • Influence of air quality and soiling on operational efficiency of Solar PV Plant. 	<ul style="list-style-type: none"> ○ An appropriate maintenance and cleaning plan is to be developed for the PV panels.
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	+/- Impacts	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	-	local	medium	long-term	likely	2
After Mitigation	-	local	low	long-term	unlikely	1

12.20 Noise

12.20.1 *Impact Description*

Sensitive receptors to noise impacts in the study area include people residing in the surrounding rural areas, ecological receptors (fauna) and livestock.

During construction, localised increases in noise will be caused by earthworks, establishment and operating of site construction laydown area, construction of proposed infrastructure, transportation of construction workers and material, activities at the construction camp, and general construction noise.

Solar PV facilities produce electricity during the daytime hours, when the sun's rays are collected by the panels. When there is little to no irradiance, noise emitted by the equipment is significantly reduced. The main sources of noise from the Project will be the rack mounted inverters and the central step-up transformer, which are only expected to be audible to operational staff who will come in close proximity to these components. Other sources of noise include operation and maintenance vehicles and activities.

During the operational phase, power lines produce an audible sound or buzz because they are producing something called a corona discharge that is interacting with the surrounding air. The corona discharge is a side-effect of the electric field the power line generates by carrying electricity. The discharge can be greater and the buzzing louder if there is increased moisture or pollutants in the air. Under normal conditions, corona-generated noise is not audible. The noise may be audible under certain wet conditions. Conductors are selected based on factors such as audible noise, corona, and electromagnetic field mitigation. In addition, corona rings can be fitted if deemed necessary. Corona is not associated with any adverse health effects in humans or livestock.

Noise that emanates from construction and operational activities are addressed through targeted best practices in the EMP. The associated regulated standards need to be adhered to.

Project personnel working on the construction site will experience the greatest potential exposure to the highest levels of noise and vibration. Workplace noise and vibration issues will be managed as part of the Occupational Health and Safety Management System to be employed on site, which will include specific measures aimed at preventing hearing loss and other deleterious health impacts.

12.20.2 *Impact Assessment*

Environmental Feature	Noise
Relevant Alternatives & Activities	Construction domain of development footprint
Project life-cycle	Construction phase
Potential Aspects & Impacts	Proposed Management Objectives / Mitigation Measures
<ul style="list-style-type: none"> Noise as a result of construction activities 	<ul style="list-style-type: none"> The provisions of SANS 10103:2008 will apply to all areas within audible distance of residents. Working hours to be agreed upon with Project Manager, so as to minimise disturbance to landowners/occupiers and community members. Noise preventative measures (e.g., screening, muffling, timing, pre-notification of affected parties) to be employed.

	+/- Impacts	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	-	local	medium	short-term	likely	2
After Mitigation	-	local	low	short-term	unlikely	1

12.21 Hazardous Substances & Waste

12.21.1 *Impact Description*

Improper management of hazardous substances and waste may pollute the biophysical environment (air, water and soil), and pose risks to humans, flora and fauna. It may also cause visual impacts.

Hazardous substances to be stored and used during the construction and operational phases of the Project include oil, fuel, solvents, pesticides, lithium-ion batteries (BESS), etc.

General construction waste will comprise of surplus or off-specification materials (e.g., concrete, wooden pallets, packaging paper or plastic, wood, metals, etc.) and construction debris. Domestic waste will include food waste, plastic, glass, aluminum cans and waste paper. A small proportion of the waste generated during construction phase will be hazardous and may include used oil, hydraulic fluids, waste fuel, grease and waste oil containing rags. Wastewater, including water adversely affected in quality through construction-related activities and human influence, will include sewage, water used for washing purposes (e.g., equipment, staff) and drainage over contaminated areas (e.g., workshop, equipment storage areas).

Waste types likely to be generated during routine operation and maintenance activities include dielectric fluids, clearing agents, oils, solvents, wastewater, defunct / damaged PV cells and substation components, as well as domestic waste.

Provision is made in the EMPr to manage impacts associated with hazardous substances and waste.

12.21.2 *Impact Assessment*

Environmental Feature	Hazardous Substances & Waste
Relevant Alternatives & Activities	Storage and use of hazardous substances & generation of waste
Project life-cycle	Construction & operational phases
Potential Aspects & Impacts	Proposed Management Objectives / Mitigation Measures
<ul style="list-style-type: none"> Environmental pollution caused by improper management of hazardous substances and waste. 	<ul style="list-style-type: none"> Hazardous substances shall be stored and handled in accordance with the appropriate legislation and standards, which include the Hazardous Substances Act (Act No. 15 of 1973), Occupational Health and Safety Act (No. 85 of 1993), relevant associated Regulations and applicable SANS and international standards. Storage and use of hazardous materials will be strictly controlled to prevent environmental contamination and will adhere to the requirements stipulated on the Material Safety Data Sheets. In the event of spillages of hazardous substances the appropriate clean up and disposal measures shall be implemented. BESS to have electrical and fire protection measures in the form of battery temperature monitoring, circuit breakers, fire detection and fire suppression as per regulatory requirements. Waste to be disposed of at a licenced waste disposal facility. Water used for cleaning of PV panels will not contain any harmful chemicals or additives. Wastewater to be properly disposed of. Contaminated water will not be discharged to the environment. Used lithium-ion batteries and PV panels are to be removed by the suppliers, who are to recycle material and recover any hazardous substances (as relevant). Provision to be made in the supply agreements between the Proponent and the selected suppliers.

+/- Impacts	Extent	Magnitude	Duration	Probability	Significance
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Before Mitigation	-	local	medium-high	long-term	likely	3
After Mitigation	-	local	low	long-term	unlikely	1

Potential risks and related control measures associated with the BESS facility are captured in **Table 34** below. A detailed risk assessment will need to be undertaken based on the type of BESS technology selected and the final design of the Solar PV Plant. The outcomes of this risk assessment will need to be incorporated into the Operational EMPr.

Table 34: Proposed management of risk to BESS (based on Arup, 2018)

No.	Risk	Possible Consequences	Control Measures
1	Risk posed by veld fires (external to site) to BESS facility	Damage to BESS	<ul style="list-style-type: none"> ▪ Implementation of a fire break around the site ▪ Include measures to deal with veld fires in the Emergency Response Plan ▪ Coordination with local fire authorities ▪ Provide fire extinguishers on site
2	Damage caused to cells by an external event	Lithium Ion Cell leakage	<ul style="list-style-type: none"> ▪ Lithium batteries do not contain free liquid electrolytes ▪ Individual cells are used which minimises extent of release
3	Damage to batteries from vehicle collision	<ul style="list-style-type: none"> ▪ Damage to battery cells ▪ Electrical risks 	<ul style="list-style-type: none"> ▪ Use of perimeter fence around BESS facility ▪ Appropriately designed internal access roads ▪ Limit of speed limit within fenced facility ▪ Earthing system installed as per normal electrical facilities
4	Transformer oil leakage due to corrosion of tank base or leakage of oil tank	Leakage of transformer oil to environment, with resultant pollution	<ul style="list-style-type: none"> ▪ Use of fully bunded oil storage for transformers ▪ Regular tank inspections
5	Collapse or fall of overhead electricity line onto BESS facility	Damage to BESS facility	<ul style="list-style-type: none"> ▪ BESS facility to be located outside of power line servitude
6	Security breach into BESS facility for theft of components	Theft of equipment or risk to personnel	<ul style="list-style-type: none"> ▪ Installation of security fencing around entire Solar PV Plant and around the BESS facility ▪ Installation of security system to monitor key areas ▪ Inspections to monitor for security breaches
7	Spread of fire across BESS facility between battery packs	Localised fire causing damage by spreading to BESS facility	<ul style="list-style-type: none"> ▪ Separation distances between battery packs in accordance with manufacturer recommendations ▪ Adherence to fire management measures ▪ Provide fire extinguishers on site ▪ BESS area will have a non-flammable buffer area to prevent the spread of fire. ▪ BESS will have electrical and fire protection measures in the form of battery temperature monitoring, circuit breakers, fire detection and fire suppression
8	Electrocution due to electrical fault	Electrical fault causing personnel injury	<ul style="list-style-type: none"> ▪ Normal electrical standards and installation of appropriate earthing system ▪ Use of appropriately qualified maintenance personnel
9	Lightning striking BESS facility	Lightning strike causing damage to facility or personnel	<ul style="list-style-type: none"> ▪ Include lightning protection measures, if deemed necessary
10	High rainfall and flooding to site	Damage to electrical equipment	<ul style="list-style-type: none"> ▪ BESS facility to be developed outside of the 1:100 year floodline of any watercourse
11	High wind events and seismic events	Structural damage to equipment or battery packs	<ul style="list-style-type: none"> ▪ Appropriate design of BESS facility, taking into consideration <i>inter alia</i> climatic and geotechnical conditions

12.22 Traffic

12.22.1 *Impact Description*

A Traffic Impact Assessment was undertaken for the proposed Project (**Appendix E9**). The potential transport related impacts are described below.

The construction phase will generate traffic including transportation of people, construction materials, water, and equipment (abnormal trucks transporting the transformers). The exact number of trips generated will be determined at a later stage. Based on the high-level screening of impacts, a negative low impact rating can be expected during the construction phase with mitigation measures.

Nature of the impact

- Temporary increase in traffic, noise and dust pollution associated with potential traffic.

Potential impact during Operation

- Noise and dust pollution associated with potential traffic. The traffic generated during this phase will have a nominal impact on the surrounding road network.

Potential impact during Operation

- This phase will have a similar impact as the construction phase (i.e., traffic congestion, air pollution and noise pollution) as similar trips/movements and associated noise and pollution are expected.

12.22.2 *Impact Assessment for construction and decommissioning*

TRAFFIC & TRANSPORT						
CONSTRUCTION / DECOMMISSIONING PHASE						
Potential Impact	Mitigation					
Increase of construction vehicles on the roads will occur, which may have an impact on communities and general traffic; increase of noise and dust pollution.	<ul style="list-style-type: none"> • Stagger component delivery to site • Reduce the construction period where possible • Stagger the construction phase • The use of mobile batch plants and quarries in close proximity to the site would decrease the impact on the surrounding road network. • Staff and general trips should occur outside of peak traffic periods as much as possible • Maintenance of haulage routes • Design and maintenance of internal roads 					
Without Mitigation	Status	Extent	Magnitude	Duration	Probability	Significance
	Negative	National	Medium	Short-term	Almost certain	2
With Mitigation	Status	Extent	Magnitude	Duration	Probability	Significance
	Negative	National	Low	Short-term	Likely	2

TRAFFIC & TRANSPORT						
OPERATIONAL PHASE						
Potential Impact	Mitigation					
Slight increase of vehicle trips due to permanent staff traveling to site, periodically (bi-annual) trips to site for transport of water and irregular maintenance trips.	<ul style="list-style-type: none"> ▪ Source on-site water supply if possible. ▪ Utilise cleaning systems for the panels needing less vehicle trips. ▪ Schedule trips for the provision of water for the cleaning of panels outside peak. traffic times as much as possible. 					
Without Mitigation	Status	Extent	Magnitude	Duration	Probability	Significance
	Negative	Local	Low	Long-term	Almost certain	2
With Mitigation	Status	Extent	Magnitude	Duration	Probability	Significance
	Negative	Local	Low	Long-term	Likely	1

12.22.3 Impact Assessment for construction and decommissioning - cumulative

TRAFFIC & TRANSPORT						
CONSTRUCTION / DECOMMISSIONING PHASE - CUMULATIVE						
Potential Impact	Mitigation					
Further increase of development trips during construction phase if Onderstepoort Solar 1, Onderstepoort Solar 2 and Rhino Solar PV will be constructed at the same time.	<ul style="list-style-type: none"> • Same mitigation measures as Table 7-2. <p>It is noted that it is deemed unlikely that all three developments will be constructed at the exact same time. However, for the event that the developments have similar construction periods, it is recommended to agree on a delivery schedule between the respective projects.</p>					
Without Mitigation	Status	Extent	Magnitude	Duration	Probability	Significance
	Negative	National	High	Short-term	Likely	2
With Mitigation	Status	Extent	Magnitude	Duration	Probability	Significance
	Negative	National	Medium	Short-term	Likely	2

Impact Assessment for Operational/Maintenance - cumulative

TRAFFIC & TRANSPORT						
OPERATIONAL PHASE - CUMULATIVE						
Potential Impact		Mitigation				
Increase of vehicle trips due to permanent staff traveling to site, periodically (bi-annual) trips to site for transport of water and irregular maintenance trips.		<ul style="list-style-type: none"> Same mitigation measures as Table 7-3. 				
Without Mitigation	Status	Extent	Magnitude	Duration	Probability	Significance
	Negative	Local	Medium	Long-term	Likely	2
With Mitigation	Status	Extent	Magnitude	Duration	Probability	Significance
	Negative	Local	Low	Long-term	Likely	1

12.23 Civil Aviation

12.23.1 *Impact Description*

Possible impacts that may be caused by a Solar PV Plant to civil aviation include potential glare and glint from *inter alia* PV panels, steel array mounting, glass windows and rooftops that might cause temporary loss of vision to pilots on arrival or departure. Towers and transmission lines can disrupt airplane flight paths in and near airports and endanger low-flying airplanes, especially those used in agricultural management activities.

Glint and glare are caused by many reflective materials, whereby light from the sun is reflected off such materials with a potential to cause hazard, nuisance or unwanted visual impact. It is noted that solar panels are designed to absorb, not reflect, irradiation.

According to the findings from the Screening Tool, the PV Site has low sensitivity and the powerline is low sensitivity in terms of the relative civil aviation theme (see **Figure 69** below). Accordingly, no Glint and Glare Impact Assessment in terms of Obstacle Notice 4/2017, was undertaken, as there are “no major or other types of civil aviation aerodromes” in proximity to the site.

The SACAA was engaged with as part of the EIA and the Applicant will adhere to the requirements of this authority.

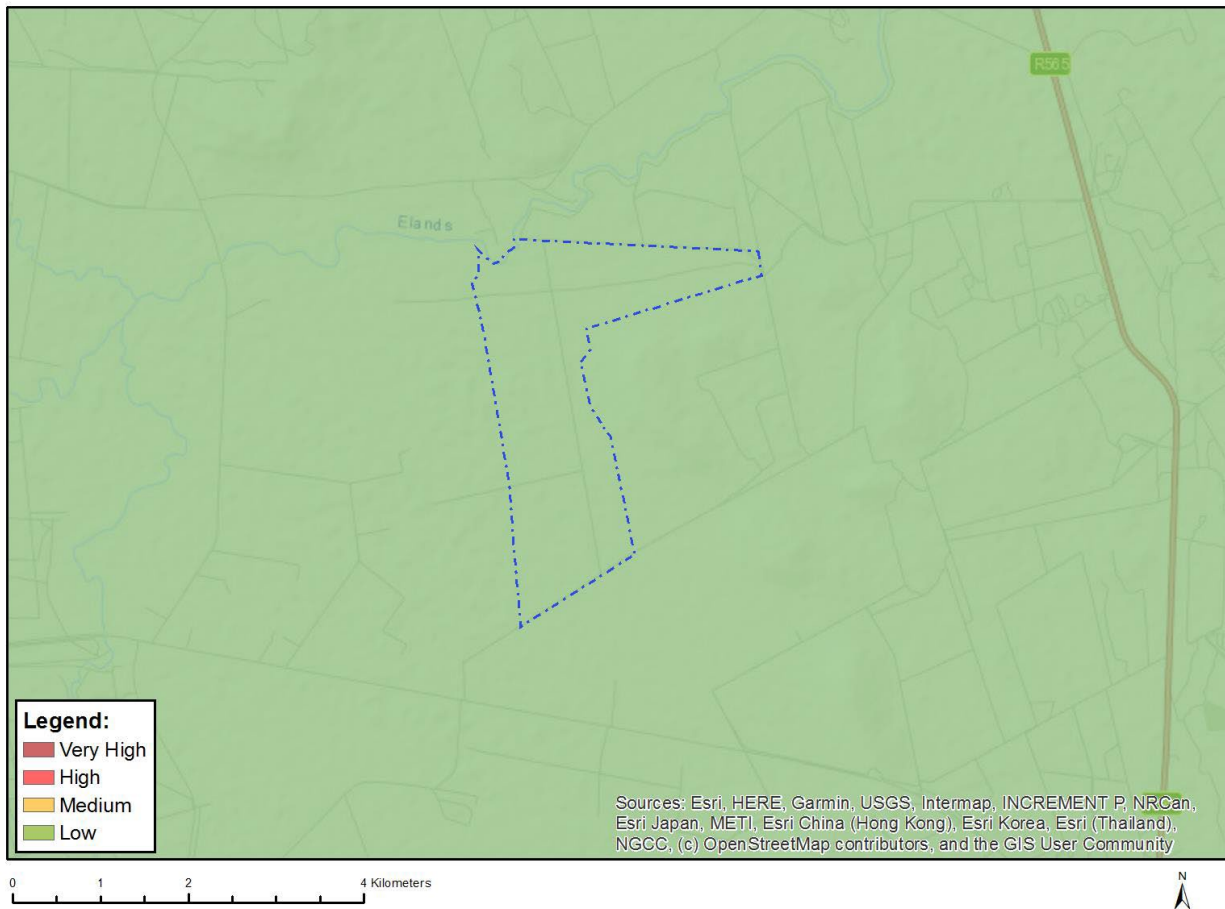


Figure 70: Map of relative civil aviation theme sensitivity for Solar PV Site

12.23.2 Impact Assessment

A quantitative impact assessment was not undertaken from a civil aviation perspective, due to the reasons provided in **Section 13.23.1** above.

12.24 Existing Structures and Infrastructure

12.24.1 Impact Description

An existing overhead power line traverses the PV Site and the Lindleyspoort Road (off the R565) runs along the southern boundary of the site. The setbacks / conditions required by the custodians of infrastructure on the PV Site and along the power line route will need to be adhered to.

Potential impacts of the Project to existing structures and infrastructure include:

- Disruptions to services or damage caused as a result of construction activities;
- Disruptions to traffic on Lindleyspoort Road (off the R565) during construction (see **Section 13.19** above); and
- Construction-related disturbances (e.g. noise, dust).

A detailed survey will be conducted to identify all physical features that are located within the final project footprint. Optimisation of the layout during the design phase will seek to avoid existing structures and infrastructure, where possible. Where avoidance is not possible, suitable compensation measures need to be established, as necessary.

During the public participation process conducted to date, infrastructure owners and custodians (example Eskom Distribution) provided wayleave requirements and conditions when working near or closer to existing services.

12.24.2 *Impact Assessment*

Environmental Feature	Existing Structures and Infrastructure
Relevant Alternatives & Activities	All activities that affect existing structures and infrastructure
Project life-cycle	Construction & operational phases
Potential Aspects & Impacts	Proposed Management Objectives / Mitigation Measures
<ul style="list-style-type: none"> • Disruption of existing services. • Damage to existing structures and infrastructure. 	<ul style="list-style-type: none"> ○ Identify and record existing services and infrastructure. ○ Conform to requirements of relevant service providers and infrastructure custodians (e.g. Eskom, Transnet, Telkom, SANRAL, NWDPR, etc.). ○ Ensure access to infrastructure is available to service providers at all times. ○ Immediately notify service providers of disturbance to services. Rectify disturbance to services, in consultation with service providers. Maintain a record of all disturbances and remedial actions on site. ○ Adequate reinstatement and rehabilitation of affected environment.

	+/- Impacts	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	-	local	medium-high	short-term to permanent	likely	3
After Mitigation	-	local	low	short-term	unlikely	1

12.25 Health and Safety

12.25.1 *Impact Description*

Construction Phase

Health and safety related risks associated with the Project during the construction phase include the following:

- Hazards related to construction work;
- Increased levels of dust and particulate matter, as well as noise;
- Water (surface and ground) contamination;
- Poor water and sanitation services for construction workers;
- Communicable diseases;
- Psychosocial disorder (e.g. social disruptions);
- Safety and security to the local community; and

- Lack of suitable health services.

These risks are addressed through mitigation measures identified under other environmental features, such as socio-economic environment, surface water, air quality, noise, as well as best practices included in the EMP. Additional management requirements will be included in the Project's Occupational Health and Safety system.

Operational Phase

The predominant types of hazards associated with battery systems include electric shock, stored energy, chemical, flammable emission, thermal runaway, transportation, kinetic energy and manual handling (Energy Storage Council, 2016). A lithium-ion based BESS must be designed with proper disconnects, relays, thermal management, enclosures, layout, monitoring and controls to mitigate risks to the required level of safety. Operating strategies spanning proper planning, risk assessment, storage methods, maintenance protocols, and response protocols are the other important factors in mitigating lithium-ion safety risks (Butler, 2013).

Electromagnetic fields (EMFs) are produced whenever electricity is used. Research into electric and magnetic fields undertaken at utility scale PV installations in California by Chang and Jennings (1994), indicated that magnetic fields were significantly less for solar arrays than for household applications. Chang and Jennings (1994) found magnetic fields from solar arrays were not distinguishable from background levels at the site boundary, suggesting the health risk of EMFs from solar arrays is minimal.

For a transmission line, the strength of the electric field varies generally with the operating voltage of the line (measured in volts) while the magnetic field strength is related to the current flowing in the line (measured in amps) (Parsons Brinckerhoff, 2013). EMF strengths dependent on *inter alia* the height of the electrical wires above the ground and their geometric arrangements, which are supported by the transmission structures.

Even though the EMF inside a substation is high (but less than occupational limits), the fields outside the substation decrease with distance, as is the case with power lines (Wolhuter & Holtzhausen, 2015). It is documented in literature that EMF levels reduce rapidly with distance from the source. The Project's proposed substation, which contains high voltage transformers, will be enclosed by security fencing to prevent unauthorised access and the exposure to high voltage electricity. This will also provide safe distance between electrical equipment and the general public.

Other health and safety risks associated with the Project during the operational phase include the following:

- Leaching of materials from broken or fire damaged PV modules;
- Injuries to workers from operation and maintenance activities (vehicle accidents, replacement of components/parts, etc.) and;
- Emergency fire hazards; and
- Electrocution of workers.

12.25.2 Impact Assessment

Environmental Feature	Health and Safety
Relevant Alternatives & Activities	Construction activities

Project life-cycle	Construction phase
Potential Aspects & Impacts	Proposed Management Objectives / Mitigation Measures
<ul style="list-style-type: none"> Health and safety risks during construction. 	<ul style="list-style-type: none"> Dedicated Occupational Health and Safety system to be implemented by the Contractor. Undertake a hazard identification and risk assessment and identify preventive and protective measures. Conduct basic safety awareness training with construction workers. Provide all workers with the necessary Personal Protective Equipment (PPE). Prevent environmental contamination. Provide potable water and sanitation services to workers. All workers shall be clearly identifiable and shall remain within the construction domain during working hours. Prepare an Emergency Response Plan. Ensure adequate control of communicable diseases. Maintain access control to construction domain.

	+/- Impacts	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	-	local	high	short-term	likely	3
After Mitigation	-	local	low	short-term	unlikely	1

Relevant Alternatives & Activities	Operation and maintenance activities
Project life-cycle	Operational phase
Potential Aspects & Impacts	Proposed Management Objectives / Mitigation Measures
<ul style="list-style-type: none"> Health and safety risks posed by operation and maintenance activities. 	<ul style="list-style-type: none"> Dedicated Occupational Health and Safety system to be implemented by the Operator of the PV Plant. Conduct basic safety awareness training with all operational staff. Temporary Contractors to adhere to Occupational Health and Safety requirements. Provide potable water and sanitation services to operational staff. Prepare an Emergency Response Plan. Measures at the battery storage area to manage fire risks will include a non-flammable buffer area to prevent the spread of fire, battery temperature monitoring, circuit breakers, fire detection and fire suppression as per fire and electrical regulatory requirements. Provide adequate access/egress for installation and maintenance at the BESS. Maintain servitude. Ensure EMF remain less than occupational limits within substation. Control access to the substation.

	+/- Impacts	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	-	local	high	long-term	likely	3
After Mitigation	-	local	low	long-term	unlikely	1

12.26 Social Environment

The findings from the Social Impact Assessment (Tanhuke & Chidley, 2023) follow. The specialist report is contained in **Appendix E7**.

12.26.1 *Impact Description*

An “Activity” is defined as a distinct process or risks undertaken by an organisation for which a responsibility can be assigned. Activities also include facilities or pieces of infrastructure that are possessed by an organisation (International Organization for Standardization, 2011). An aspect is defined as elements of an organisation’s activities, products, or services that can interact with the environment. To capture the impacts associated with the proposed infrastructure, an activity – aspect – impact table was created refer to the table below.

The activities, aspects and impacts associated with the social environment are captured as follows:

Activity	Aspect	Potential Impact – Positive	Potential Impact – Negative	
Planning Phase	Land Acquisition		Loss of agricultural production	
			Loss of land through land acquisition for project infrastructure	
	Servitude Rights		Some restrictions on use of productive land, owing to servitude rights being established	
Construction Phase	Access into private property		Property Damage	
			Risk of trespassing	
	Solar Park Construction – piling, frame erection and solar panel mounting, electrical installation and rehabilitation	Employment of local staff		
		Opportunity for local business		
		Skills development		
				Noise
				Dust
				Cultural Resistance to Women in the Workplace
		Injuries and poor workforce health		
		Increased community conflicts due to employment of outsiders		

Activity	Aspect	Potential Impact – Positive	Potential Impact – Negative	
Scheme Operations			Influx of people seeking employment and associated impacts (e.g., cultural conflicts, squatting, demographic changes, anti-social behaviour, and incidence of HIV/AIDS)	
			Livestock and game animal theft	
	Transport of goods to site and employment of staff		Increased traffic	
	Rehabilitation			Damage or wear to access roads
				Security
				Damage to property or equipment
	Electricity generation	Economic growth and induced impacts		
	Supply of goods and services to the project		Opportunity for local business	
			Employment of local staff	
	Administration and Technical Input		Employment of local staff	
		Skills development		

12.26.2 Impact Assessment during planning

Impact for institutional, legal, political and equity for all phases

Environmental Feature	Land Acquisition and Servitude Rights					
Project life cycle	All Phases					
Potential Impact	Proposed Management Objectives / Mitigation Measures					
Loss of agricultural production	<ul style="list-style-type: none"> This impact has been considered by a dedicated specialist study. The SIA defers to the opinions of the agricultural specialists in this regard and their mitigation measures should be adopted 					
Loss of land through acquisition for project infrastructure	<ul style="list-style-type: none"> Any land acquisition should be conducted on a willing buyer, willing seller basis and that the owner is not treated unfairly in the process. 					
Some restrictions on use of productive land, owing to servitude rights being established	<ul style="list-style-type: none"> Any servitude establishment should result in fair compensation for land owners. The establishment of servitude rights should not reduce the existing productivity of land owner's land holdings. 					
	Nature	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	Negative	Site	Moderate	Long Term	High	2

After Mitigation	Negative	Site	Low	Long Term	High	1
Significance of Impact and Preferred Alternatives	The impact on project progress could be significant if land acquisition is not compensated. This can be effectively mitigated.					
	The impact has no consequence for project alternatives.					

12.26.3 *Impact Assessment during construction*

Impact for economic opportunities

The project is expected to bring economic benefit to the local community through employment opportunities for labourers and locally owned businesses.

In addition to the economic value added, the construction phase was estimated to produce some 1 387 job years in the regional study area. Considering experience with renewable project implementation in South Africa, 111 job years (8%) are likely to accrue to females, and a total of 624 years (41%) are likely to accrue to youth.

The official youth unemployment rate in the region is likely higher than the general unemployment rate, this being the trend nationwide. This project has the potential to impact positively on this rate should employment practises targeted at workers (male and female) under 35 years old be adopted.

Environmental Feature	Economic Opportunities					
Project life-cycle	Construction phase					
Potential Impact	Proposed Management Objectives / Mitigation Measures					
Employment of people locally	<ul style="list-style-type: none"> Youth development should be considered as an initiative so that there is a benefit of transferring skills to the community. This can be achieved through the assistance of the local municipality. 					
	<ul style="list-style-type: none"> The main contractor should employ non-core labour from the regional study area as far as possible during the construction phase. 					
Opportunity for local business	<ul style="list-style-type: none"> Local SMMEs should be given an opportunity to participate in the construction of the project through the supply of services, material or equipment. 					
Skills development	<ul style="list-style-type: none"> A skills transfer plan should be put in place at an early stage and workers should be given the opportunity to develop skills whilst in employment. 					
	Nature	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	Positive	Regional	Medium	Short Term	Likely	1
After Mitigation	Positive	Regional	Large	Short Term	Likely	3
Significance of Impact and Preferred Alternatives	Individuals who will benefit during the construction are limited to those who actively participate in the construction activity through employment, sub-contracting or other economic opportunities. Active local participation should be encouraged.					
	The economic benefits of construction will take place irrespective of which alternative is presented.					

Impact for noise, dust and traffic

During the construction phase, there is a potential for communities to be exposed to increased dust, and noise. The site is in an isolated area where the number of community receptors is limited, conversely however there a few noise and dust generating activities in the area, hence small increases in noise and dust will be noticed by local communities.

Environmental Feature	Noise, Dust and Traffic					
Project life-cycle	Construction phase					
Potential Impact	Proposed Management Objectives / Mitigation Measures					
Increase in Dust	<ul style="list-style-type: none"> Dust can be mitigated using appropriate dust suppression mechanisms. Limit road speeds on site through the erection of speed limits signage 					
Noise impacts	<ul style="list-style-type: none"> Prior notice should be given to surrounding communities of noisy events such as blasting. Construction work should take place during working hours – defined as 07h00 to 17h00 on weekdays and 07h00 to 14h00 on Saturdays. Should overtime work be required, that will generate noise, notice should be given to the affected community or landowners. 					
Increase in Traffic	<ul style="list-style-type: none"> This impact has been considered by a dedicated specialist study. The SIA defers to the opinions of the traffic specialists in this regard and their mitigation measures should be adopted 					
Damage or wear to access roads	<ul style="list-style-type: none"> This impact has been considered by a dedicated specialist study. The SIA defers to the opinions of the traffic specialists in this regard and their mitigation measures should be adopted 					
	Nature	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	Negative	Local	Medium	Short Term	Likely	2
After Mitigation	Negative	Local	Low	Short Term	Moderate	1
Significance of Impact and Preferred Alternatives	<p>Noise and dust during construction is to be expected. These can then be successfully mitigated through contractor controls and through the continuous monitoring of contractor progress during the construction phase.</p> <p>Negative impacts owing to the construction will unfortunately be experienced irrespective of the site and routing alternative that is most preferred and chosen.</p>					

Impacts for Cultural Resistance to Women in the Workplace

Gender relations are recognised as an important factor in the efforts to achieve equity across society. Construction is a male-dominated industry; however, skills development initiatives directed at women may mean it is an industry that could benefit from equitable representation.

Although equal access to employment across gender lines is a recognised right, the application of this right is often executed without careful consideration of the factors that may frustrate this right amongst women in the workplace. In this regard women are often subjected to cultural factors within the workforce from both

peers on the job and from management who may resist both employing and promoting women, often based on cultural prejudices. Consequently, the International Labour Organisation points out that:

“Societies therefore have an obligation to create conducive social environment for all their citizens to be able to exercise their right to work, fully utilizing their human potential. Furthermore, evidence has shown that when women are employed and have their own income in their hands, there exist both direct and indirect social benefits for themselves and their households” (Otope, 2014, p. 1).

Environmental Feature	Cultural resistance towards women					
Project life-cycle	All phases					
Potential Impact	Proposed Management Objectives / Mitigation Measures					
Cultural resistance towards women because of increased gender representation in the workforce	<ul style="list-style-type: none"> Sensitise staff in respect of gender issues that are pertinent to the workplace. 					
	<ul style="list-style-type: none"> Ensure gender inclusivity and equity with respect to all compensation. 					
	<ul style="list-style-type: none"> Prioritise gender inclusivity and equity in access to resources, goods, services and decision making with the aim of empowering women. 					
	<ul style="list-style-type: none"> Promote equal job opportunities for women and men during the construction phase 					
	<ul style="list-style-type: none"> Employment practises should be demonstrated free of coercion or harassment. 					
	<ul style="list-style-type: none"> Develop a grievance procedure to specifically address gender matters. There should be a policy on harassment that is well understood by all. 					
	<ul style="list-style-type: none"> There should be separate changing and ablution facilities for men and women, and they should be clearly marked as such. 					
	Nature	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	Negative	Site	Moderate	Short term	High	2
After Mitigation	Positive	Site	Low	Short term	High	1
Significance of Impact and Preferred Alternatives	<p>The employment of women during the construction phase will have moderately negative impacts should workforce integration not be addressed. If workforce integration is successfully implemented, the impact on the project be positive.</p> <p>The impact has no influence on the choice between project alternatives.</p>					

Impact on injuries and poor workforce health

The impacts of construction can affect the health and safety of those working on the construction site. These impacts can be mitigated in the Environmental Management Programme (EMPr) and through adherence to the Occupational Health and Safety Act 85 of 1993.

An influx of workers is often characterised by higher health risks, particularly if the influx is male dominated. These include a higher disease burden and rise in HIV/AIDS rates.

It is expected that this influx will be limited owing to the large pool of potential workers for the project being available in the local study area. The fact that the labour sending areas, such as Phatsima and Rasimone are close to the construction site will obviate the need for communal living conditions that may increase the chances for the spread of disease.

There should also be awareness and education campaigns on health and socio-economic risks such as HIV/AIDS.

Environmental Feature	Injuries and Poor Workforce Health					
Project life cycle	Construction Phase					
Potential Impact	Proposed Management Objectives / Mitigation Measures					
Injuries and poor workforce health	<ul style="list-style-type: none"> The provisions of the OHS Act 85 of 1993 and the Construction Regulations of 2014 should be implemented on all sites; Account should be taken of the safety impacts on the local community when carrying out the longitudinal aspects of the project, such as the access road Contractors should establish HIV/AIDS awareness programmes at their site camps. Measures should be taken to provide condoms and, where necessary, access to counselling to address any risks to health 					
	Nature	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	Negative	Local	Medium	Short Term	Likely	2
After Mitigation	Negative	Local	Low	Short Term	Moderate	1
Significance of Impact and Preferred Alternatives	<p>The potential significance of the impact is high if a lack of attention to this aspect results in injuries to staff. The implementation of a safety system on site will minimise the risk of injuries and poor staff health during the construction phase.</p> <p>The impact has no influence on the choice between project alternatives.</p>					

Impact on Influx of Job Seekers

It is expected that the impact of this influx will be limited owing to the large pool of potential workers for the project being available in the local study area. The fact that Phatsima is close to the construction site will ensure that the workforce is able to live at home for the duration of the construction project.

Environmental Feature	Influx of Job Seekers
Project life cycle	Construction Phase
Potential Impact	Proposed Management Objectives / Mitigation Measures
Influx of people seeking employment and associated impacts (e.g., cultural conflicts, squatting, demographic changes, anti-social behaviour, and incidence of HIV/AIDS)	<ul style="list-style-type: none"> All employment of locally sourced labour should be controlled and formalised. No employment should take place from the project gate and contracts of employment should be entered into taking into account the Labour Relations Act; If possible, and if the relevant Ward Councillors deems it necessary, the employment process should include the affected Ward Councillors and their ward committee. To limit the growth of informal settlements in the project area, labour should be sourced from existing labour sending areas, from people who resided in the area prior to appointment. This process should include the Ward Councillor to ensure that only local residents are employed, rather than labour migrants.

	<ul style="list-style-type: none"> No staff accommodation should be allowed on site; To limit the growth of settlements near the project site the project proponent should provide worker transport to and from the work site for the duration of construction. The risk exists that un-controlled Spaza/informal trader shops may open next to the site to cater for construction workers. These should be controlled by the contractor to limit their footprint and to ensure that the municipal by-laws are complied with. 					
Increased community conflicts due to employment of local and non-local labourers	<ul style="list-style-type: none"> Programmes should be developed to boost the local economy. These should be in the form of Corporate Social Responsibility (CSR) that will favour local empowerment. 					
	Nature	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	Negative	Site	Moderate	Short term	High	2
After Mitigation	Negative	Site	Low	Short term	High	1
Significance of Impact Preferred Alternatives	<p>The unmitigated significance of the impact is high as community attitudes can be altered. The implementation of the overall mitigation measures is essential and necessary to minimise the impact from job-seekers influx and community impacts.</p> <p>The impact has no influence on the choice between project alternatives</p>					

12.26.4 Impact Assessment during operation

Impact on positive economic development

The positive economic and material well-being impacts associated with the project include: support to the national grid through the generation of electricity; stimulus to the national and regional study area in the form of spending associated with the project; and increase in employment opportunities; and increased opportunities for SMMEs.

Jobs created during the operational phase of the project will be limited when compared to the construction phase, but 175 jobs will be created directly by the project over its 20-year operational lifespan. In total it was estimated that 96 jobs in total will be created in this timeframe in the South African economy owing to the project.

Environmental Feature	Economic Impacts (positive)
Project life-cycle	Operational Phase
Potential Impact	Proposed Management Objectives / Mitigation Measures
Economic growth and induced impacts	<ul style="list-style-type: none"> The solar park will stimulate the local economy through the provision of jobs and through local procurement. It will contribute to the improvement of the national electricity supply at a price that has been set by a competitive bidding process
Opportunity for local business	<ul style="list-style-type: none"> Local SMMEs should be given an opportunity to participate in the operation of the project through the supply of services, material or equipment.
	<ul style="list-style-type: none"> A procurement policy promoting the use of local business where possible, should be put in place and applied throughout the operational phases of the project.
Employment of local staff	<ul style="list-style-type: none"> Women should be given equal employment opportunities and encouraged to apply for positions.

Skills development	<ul style="list-style-type: none"> A skills transfer plan should be put in place at an early stage and workers should be given the opportunity to develop skills whilst in employment. 					
	Nature	Extent	Magnitude	Duration	Probability	Significance
Before Mitigation	Positive	Regional	High	Long Term	Likely	3
After Mitigation	Positive	Regional	High	Long Term	Likely	3
Significance of Impact and Preferred Alternatives	<p>The solar park will provide economic stimulus to the regional study area for the long-term. The solar park should adopt policies that are supportive of local procurement and support for local enterprises.</p> <p>The impact has no influence on the choice between project alternatives</p>					

12.27 “No-Go” Impacts

The “no-go option” is the alternative of not implementing the activity / development. The “no-go option” also provides the baseline against which the impacts of other alternatives are compared.

The “no go option” needs to be considered in light of the motivation (see **Section 3** above) as well as the need and desirability of the Project (see **Section 8** above).

SA has identified the need to supply diversified power generation that includes renewable energy technologies, such as proposed by the Project. This is in light of the country’s endeavour and commitment to reduce the carbon footprint created by the current heavy reliance on coal to produce electricity. In this regard, the Applicant intends to bid for the current and future REIPPPP bid windows and/or other renewable energy markets within SA.

In contrast, should the proposed Project not go ahead, any potentially significant environmental issues associated with the Project (refer to **Section 13.9** to **Section 13.26** above) would be irrelevant and the status quo of the local receiving environment would not be affected by the Project-related activities. The prerogative will lie with the landowner to determine an alternative future desired use of the land where the Solar PV Plant is proposed. It is noted that the site was historically used for agricultural purposes, but it is currently used for grazing. With the “no-go option” the objectives of the Project would not be met. This will *inter alia* mean that the Project’s intended benefits will not materialise. From a social perspective, the No-Go alternative will present the following implications:

- There will be no contribution employment and skills development to the local community.
- The local economy will remain unchanged as the area and will not attract new economic investment.
- The opportunity to improve the overall supply of electricity in the regional will be missed; and
- The economic stimulus presented by the project will be foregone.

There will be less economic development as there will be no opportunities for SMMES and local labourers. Having taken into consideration the project aims of electricity generation using renewable power sources and considering the assessment above which does not indicate any fatal socio-economic flaws, the benefits from the project going ahead, from a socio-economic perspective, will be larger than not proceeding.

The “no go option” is thus not preferred.

12.28 Cumulative Impacts

12.28.1 *Introduction*

A cumulative impact, 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.

12.28.2 *Other Renewable Energy Projects in Proximity to the Proposed PV Site*

Cumulative impacts can be identified by combining the potential environmental implications of the Project with the impacts of projects and activities that have occurred in the past, are currently occurring, or are proposed in the future within the Project Area. It is noted that the accurate characterisation of the future state of the Project area is inherently speculative to an extent, due to the dynamic nature of future decisions related to land use and growth, protection of terrestrial and aquatic biological resources, water use (consumptive, waste-related and encroachments), etc.

According to the REEA Database (quarter 4, 2022), no renewable energy applications have been made for properties that are located within a 30km radius of the PV Site (refer to **Figure 71** below). There are two other known renewable energy applications in close proximity to the Project i.e. Onderstepoort Solar 2 (which is located to the west of Onderstepoort Solar 1) and Rhino Solar PV that is located 2.6 km south west of the site. These two applications will be submitted concurrently with the Onderstepoort Solar 1 application and the respective EIA processes are running concurrently.

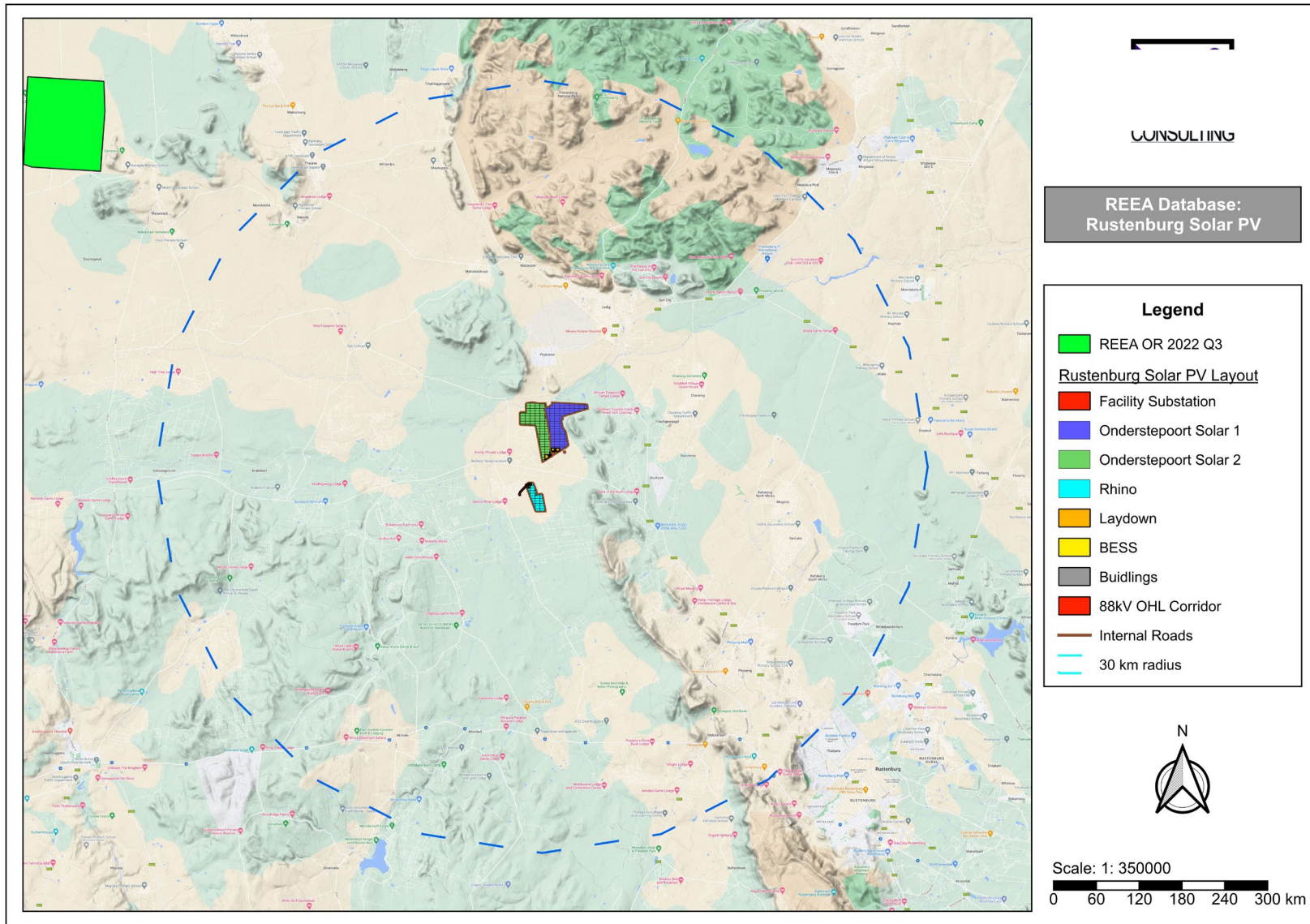


Figure 71: Renewable energy applications in relation to the Project (within a 30km radius)

The following is noted in terms of the cumulative impacts of the Project and the Onderstepoort Solar 2 and Rhino Solar PV renewable energy applications:

- ❑ There will be a cumulative loss of indigenous vegetation for these renewable energy developments. The total footprint area of the proposed Project's Solar PV Plant is difficult to estimate since most of the vegetation falling under the panels will be retained, and only hardstanding areas will be stripped of vegetation. As with the Project Area, both Onderstepoort Solar 2 and Rhino Solar PV have also been disturbed by agricultural activities.
- ❑ Cumulative impacts to freshwater resources through sedimentation (silt-laden runoff) caused by inadequate stormwater management, as well as contaminated through inadequate storage and handling of hazardous materials and poor management of waste and wastewater, would affect the same catchment (see **Figure 72** below).
- ❑ The renewable energy developments will require water for construction and operational purposes. As explained in **Section 9.8.2** above, water for the Project will be supplied from approved sources such as the RLM, Private Contractor, existing or new registered boreholes. Provision is made in the Project's EMPr to manage the consumptive use of water.
- ❑ Localised impacts in terms of noise, reduction in air quality (dust) and traffic disruptions will be managed by the provisions of the EMPr for the respective renewable energy developments.
- ❑ All three sites (Onderstepoort Solar 1, Onderstepoort Solar 2, Rhino Solar,) are accessed by roads that are linked to the R556, which is the road between Lindleyspoort and Boschhoek. The cumulative traffic impact assumes that all the proposed renewable energy projects will be constructed at the same time. 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. Provision is made in the Project's EMPr to manage traffic-related impact.



Figure 72: Major rivers in relation to the Project Area and Onderstepoort Solar 1 and 2

The following is noted in terms of the Project's contribution towards cumulative impacts:

- ❑ The construction period may cause traffic-related impacts in terms of the local road network, which will be associated with heavy vehicle construction traffic for the delivery of material, transportation of construction workers and general construction-related traffic. The EMPr includes mitigation measures to manage traffic-related impacts.
- ❑ The clearance of the vegetative cover over large areas associated with the Project's development footprint may cause erosion. According to Gouws (2023), the on the site soil is well-drained with moderately developed structure, and it is also on evenly sloped land where erosion is not expected. Mitigation measures to control erosion are included in the EMPr.
- ❑ From an agricultural perspective, the proposed development will not have impacts on farming land due to fragmentation or subdivisions of land that can lead to unsustainable farming units. There is no subdivision proposed and the land will return to farming after the life of the Project.
- ❑ There will be an increase in the dust levels during the construction phase, as a result of earthworks, use of haul roads and other gravel roads, stockpiles, material crushing, etc. Sensitive receptors to dust and other air quality impacts in the study area are discussed in **Section 13.19.1** above. Measures to manage dust are included in the EMPr.
- ❑ Construction of the proposed facilities along with construction activities of other developments in the Project Area could potentially increase noise impacts on surrounding land uses. This impact will be temporary in nature. It is further noted that noise is a localised issue that diminishes in intensity with distance from the source. Sensitive receptors to noise in the study area are discussed in **Section 13.20.1**

above. The Project's contribution to cumulative noise impacts is thus not anticipated to be significant. Measures are included in the EMP to manage noise impacts that may be caused by the Project.

- ❑ Changes in demographics in the region due to the influx of employment seekers may cause problems such as crime, STDs, conflicts with local communities, etc. This was assessed as part of the Social Impact Assessment and mitigation measures are included in the EMP.
 - ❑ There is a potential for positive cumulative economic effects from the construction of multiple developments in the area. The increased creation of jobs and economic input into local businesses would provide a benefit to local communities.
 - ❑ Specialists' assessment of cumulative impacts –
 - Heritage Impact Assessment (Kitto, 2023):
 - The Project Area and surrounding region has been affected by the following impacts:
 - Past impacts: The past HIA reports recovered from the SAHRIS database indicated that the Onderstepoort 1 Solar PV project footprint and surrounding region has been affected by several development and other activities that would have disturbed the heritage resources which occur in the area. These include mainly prospecting and mining related projects, as well as powerline construction, in addition to historical farming activities around Rustenburg and the development of Rustenburg town.
 - Current impacts: the immediate area of the Onderstepoort Solar 1 PV footprint is affected mainly by farming activities (cattle and game).
 - The baseline impacts are considered to be Low for Heritage resources, and additional project impacts (if no mitigation measures are implemented) will increase the significance of the existing baseline impacts, where the cumulative unmitigated impact will probably be of a low significance. The impact is going to happen and will be long-term in nature, but the impact risk class will be Low.
 - Visual Impact Assessment (Buys, 2023):
 - ❑ the proposed site is surrounded by various commercial and agricultural activities. In addition, according to the REEA Database, there are two (2) renewable energy applications have been made for properties located near the project site. Most of the proposed site currently grassland vegetation and the clearance and subsequent development of the site will result in the alteration of this space. Consequently, the development of this site will add cumulatively to the loss of sense of place. While the result in a change in the sense of place for those areas that look onto the project site, the magnitude of the impact is likely to be moderate as most of the sensitive receptors are located more than 2.5km from the project site (Desktop assessment).
 - Terrestrial Ecology
 - ❑ Cumulatively these developments will be responsible for the destruction of a low portion of bushveld in the area. In isolation this project will only affect 0,02% of the total area for the Zeerust Thornveld and 0.14% for the Gold Reef Mountain Bushveld vegetation bioregions; but cumulatively it will affect 0.21% of the total area for the Zeerust Thornveld.
- 1.3 Avifauna Impact Assessment (Husted, 2023):
- Localised cumulative impacts include those from operations that are close enough to potentially cause additive effects on the local environment or any sensitive receivers (such as nearby large road networks, other solar PV facilities, and power infrastructure). Relevant activities and impacts include dust deposition, noise and vibration, loss of corridors or habitat, disruption of waterways, groundwater drawdown, groundwater and surface water depletion, and transport activities. Long-term cumulative impacts associated with the site development activities can lead to the loss of endemic and threatened species, including natural habitat and vegetation types, and these

impacts can even lead to the degradation of conserved areas such as the adjacent game parks and reserves.

- The total area within the 30 km buffer around the project area amounts to 376 845.686 ha, but when considering the transformation (94 457.686 ha) that has taken place within this radius, 278 388 ha of intact habitat remains according to the 2018 National Biodiversity Assessment. Therefore, the area within 30 km of the project has experienced approximately 26.13% loss in natural habitat. Considering this context, the project footprint for the Onderstepoort 1 PV facility (according to the provided layout), and similar projects that exist in the 30 km region (Including the others of the same Rustenburg proposed development) measuring a maximum of 1 121.37 ha (as per the latest South African Renewable Energy EIA Application Database). This means that the total amount of remaining habitat lost as a result of solar projects in the region amounts to 0.4% (the sum of all related developments as a percentage of the total remaining habitat).
- Approximately 26.13% of the habitat has already been lost, and as discussed above the proposed solar developments will result in a cumulative loss of approximately 0.4% from only similar developments (Solar, approved and in process) in the area, as such the cumulative impact from the proposed development is rated as Moderately high (see Figure 58). 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.

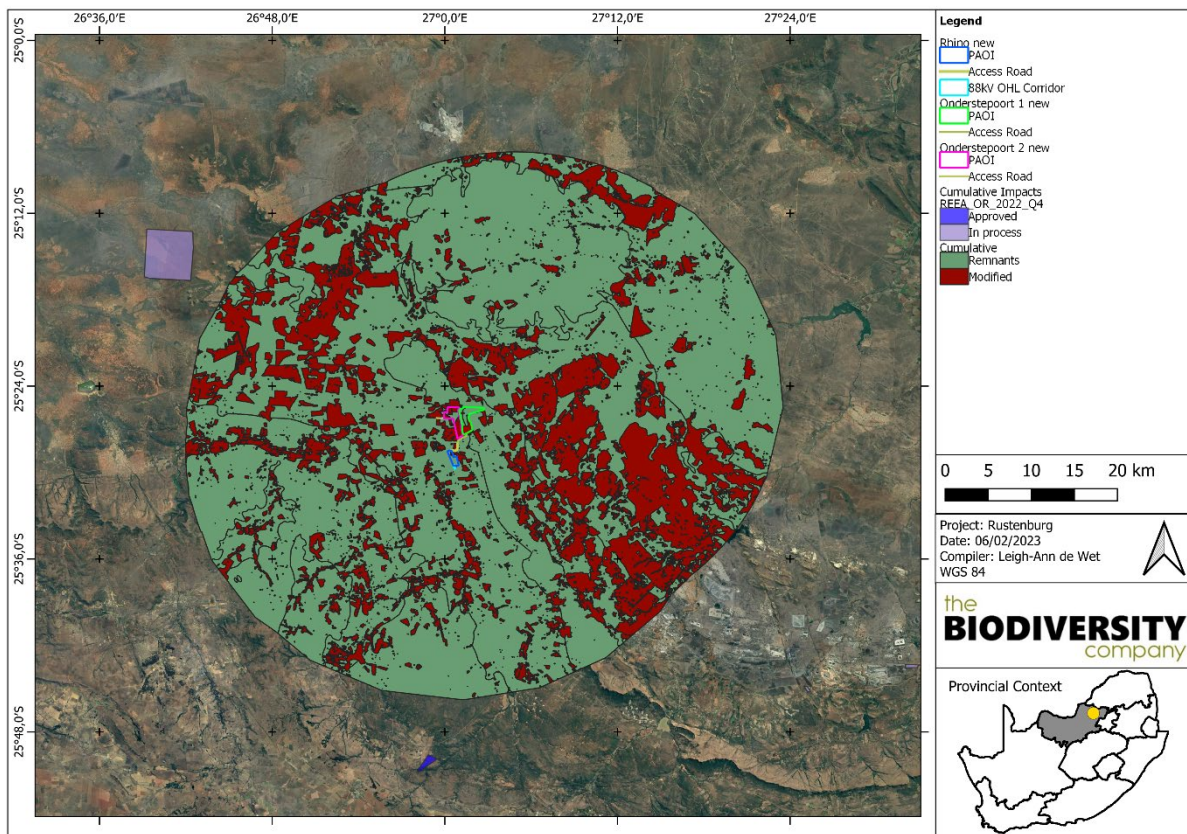


Figure 72: Additional renewable energy developments within the landscape overlaid onto the remnant vegetation types (Onderstepoort Solar 1, Onderstepoort Solar 2, and Rhino Solar PV,) (Husted, 2023)

12.28.3 Cumulative Environmental Impact Statement

From a cumulative impact perspective, there are no approved renewable energy applications within a 30km radius of the Project's PV Site (refer to **Section 13.28.2** above) according to the REEA Database (quarter 2, 2022). Cumulative impacts in relation to the Project were assessed individually in **Section 13.9** to **Section 13.26** above and mitigation measures were developed for each of the impact categories.

13 ANALYSIS OF ALTERNATIVES

13.1 General

Alternatives are the different ways in which a project can be executed to ultimately achieve its objectives. Examples could include carrying out a different type of action, choosing an alternative location or adopting a different technology or design for the project.

By conducting the comparative analysis, the Best Practicable Environmental Option (BPEO) can be selected with technical and environmental justification. Münster (2005) defines BPEO as the alternative that “*provides the most benefit or causes the least damage to the environment as a whole, at a cost acceptable to society, in the long term as well as in the short term*”.

13.2 “No-Go” Option

The implications of the “no-go” option are discussed in **Section 13.27** above. The “no go option” is not preferred, as the objectives of the Project will not be met, and the associated benefits will not materialise. Although not proceeding with the Project would avoid the adverse environmental impacts, these impacts are considered to be manageable through the provisions contained in the EIA Report and EMPr.

13.3 Layout Alternatives

13.3.1 Solar PV Plant

The original layout of the Solar PV Plant, referred to as PV Layout Alternative 1, was assessed by the specialists (refer to **Section 12.4** to **Section 12.11** above). This new layout is referred to as PV Layout Alternative 2 (see **Figure 73 and 74** below) and includes the associated changes to the various components of the Solar PV Plant:

- The initial Aquatic and Wetland Assessment advocated that the proposed development avoid the non-perennial drainage lines, as well as their associated buffers. In response, PV Layout Alternative 1 was revised to avoid encroachment into the drainage lines.
- PV Layout Alternative 2 does take into account both riparian zones as well as its 32 m buffer zones and is therefore outside any freshwater sensitive features.
- Dam
- All areas indicated as CBA2 and as high sensitivity has been excluded from development.

Through the specialist’s impact assessments and consideration of alternative 1 and 2 layouts, the following was concluded:

- The internal layouts of the facility will not impact upon the social, visual, heritage, agricultural, traffic and environment beyond the plant.
- For ecology, both alternatives are considered to have a moderate to low negative impact on the terrestrial ecosystem associated with the project area after implementation of mitigation measures. The assessment area possesses a moderate diversity and density flora species, which is well represented in

the general area. Moreover, fauna is ubiquitous within the assessment area and surrounding landscape. This area has a sensitive CBA 2 area with protected trees which cannot be relocated or re-planted as these will not survive. Alternative 2 is, however, the preferred layout alternative due to the following:

- It excludes the high sensitivity areas in alternative 1; and
 - All areas indicated by the database as CBA2 will be excluded from development.
- As the geology of the alternatives are the same there is no preference between the alternatives from a Palaeontological point of view.
- The overall impact of the project is regarded as acceptable should the mitigations and recommendations be implemented. The alternative design (Alternative 2) is the preferred layout.

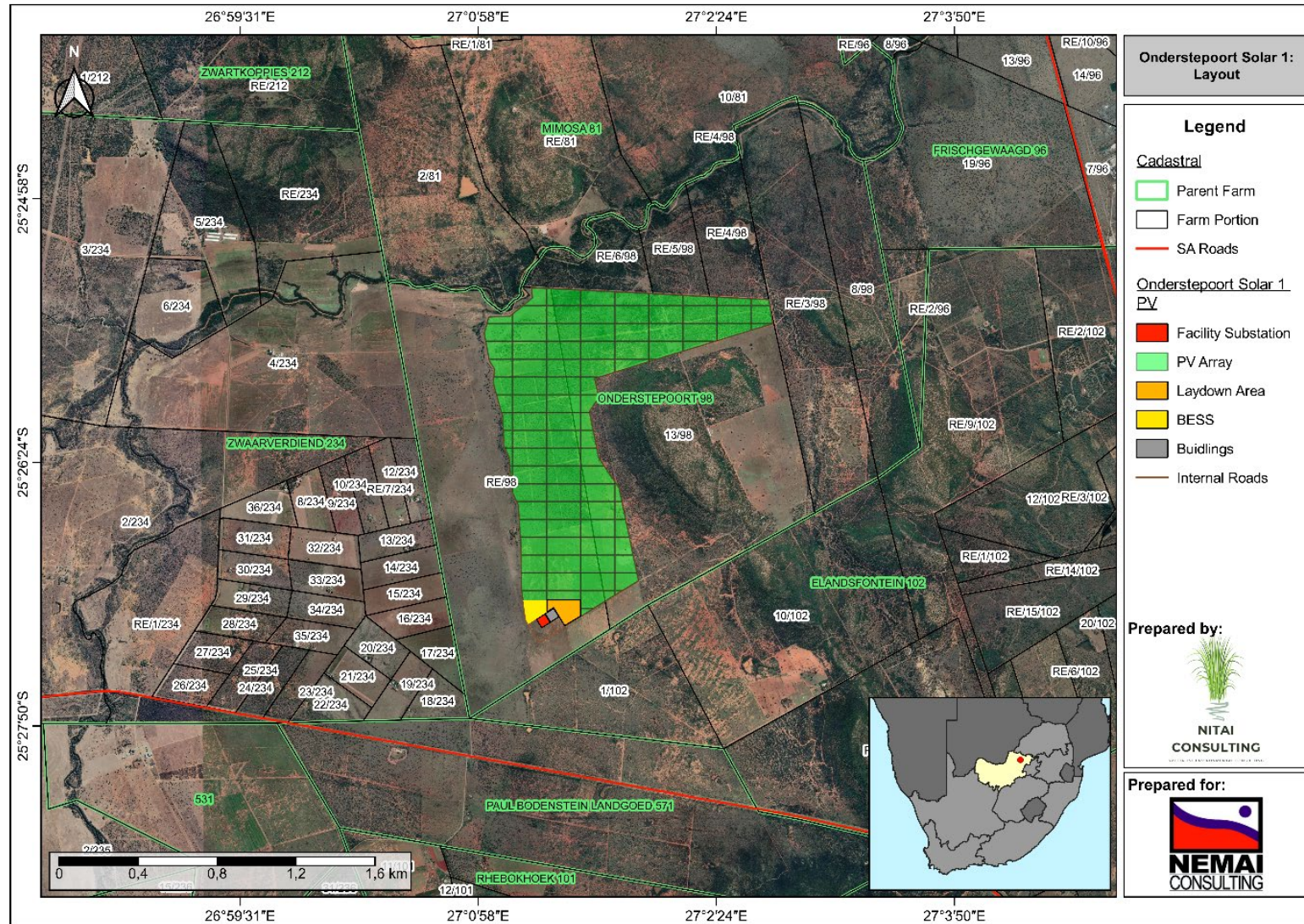


Figure 73: PV Layout Alternative 1

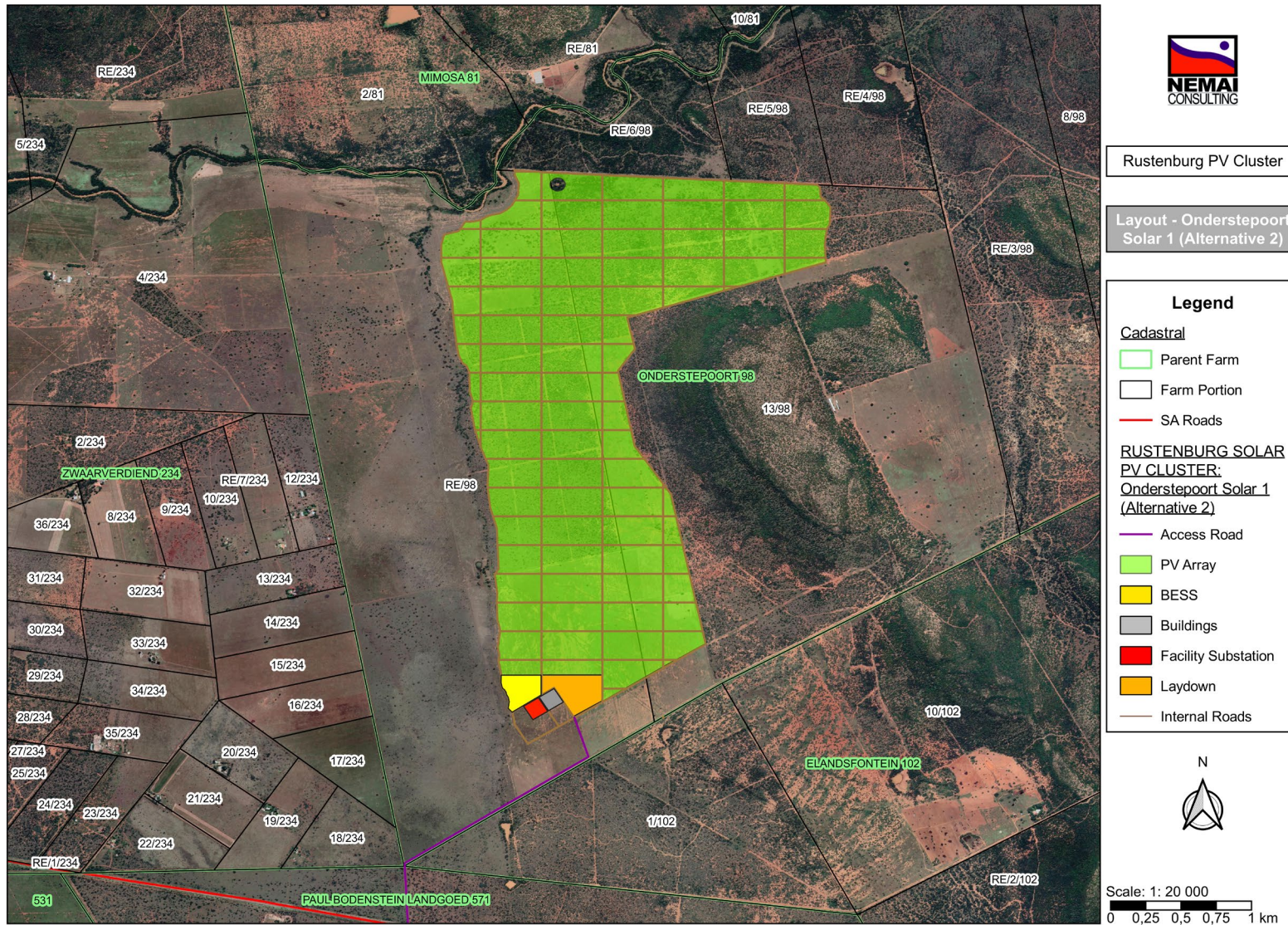


Figure 74: PV Layout Alternative 2

Based on the recommendations of the specialists, PV Layout Alternative 2 was identified as the BPEO.

13.4 Technology Alternatives

13.4.1 PV Technology

The different solar PV technologies, as explained in **Section 10.4.1** above, include a single axis tracker system and bifacial solar panels. These technology options do not constitute alternatives however, and the choice of technology will be determined during detailed design.

13.4.2 BESS Technology

The BESS can be broken into solid state and flow battery systems. A single battery technology, namely solid state, will be implemented for the Project.

14 PUBLIC PARTICIPATION

14.1 Introduction

The purpose of public participation includes the following:

- To provide I&APs with an opportunity to obtain information about the Project;
- To allow I&APs to express their views, issues, and concerns with regard to the Project;
- To grant I&APs an opportunity to recommend measures to avoid or reduce adverse impacts and enhance positive impacts associated with the Project; and
- To enable the Applicant to incorporate the needs, concerns, and recommendations of I&APs into the Project, where feasible.

The public participation process that is being undertaken is governed by NEMA and the EIA Regulations. **Figure 75** below outlines the public participation process for the upfront Announcement Phase (completed), Scoping Phase (completed) and EIA Phase (current).

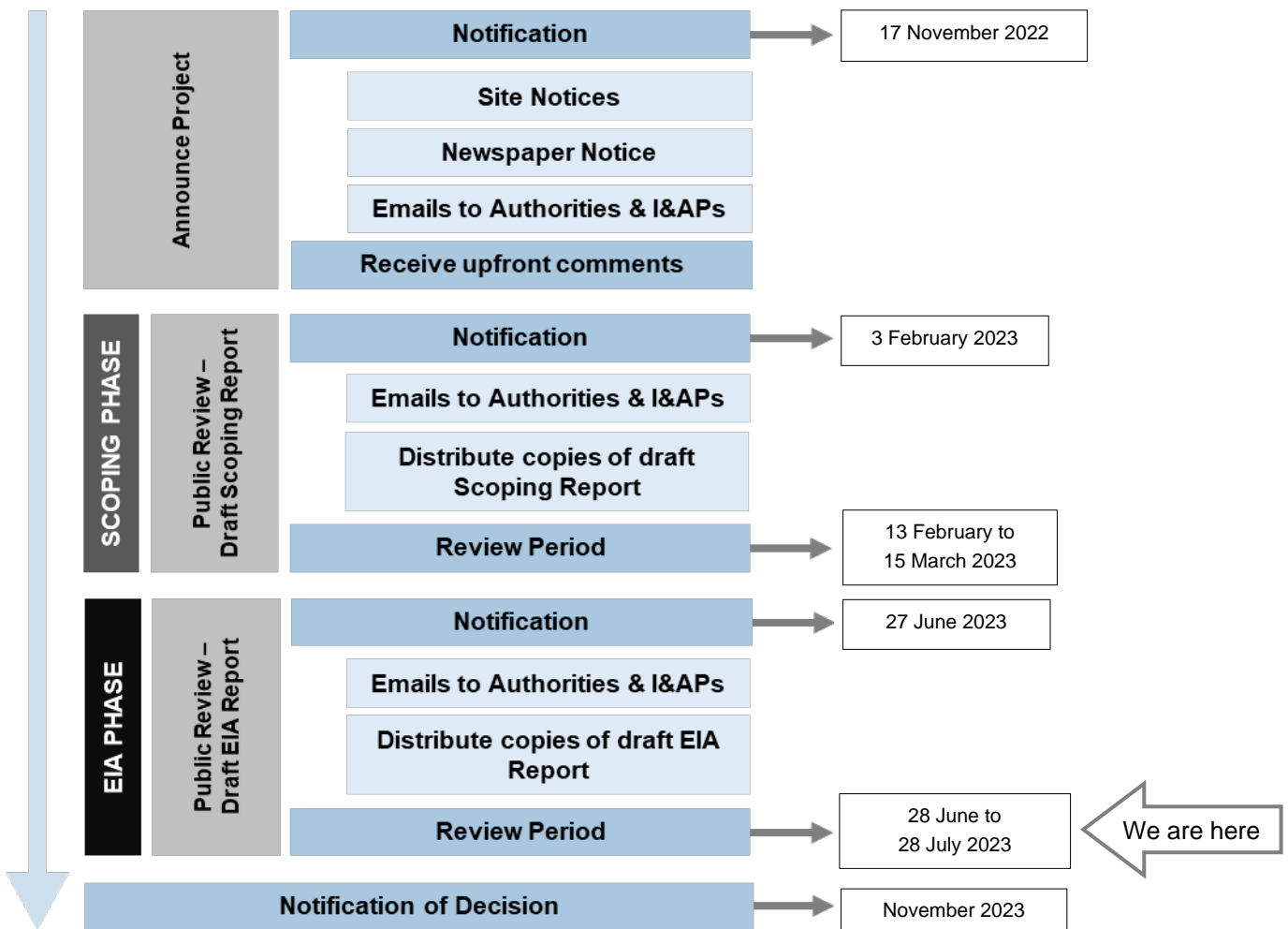


Figure 75: Outline of Public Participation Process (*note: dates are subject to change*)

14.2 Public Participation during the Announcement & Scoping Phases

The primary tasks undertaken as part of public participation during the Announcement and Scoping Phases included the following (details provided in the Scoping Report):

- Compiling a database of organs of state and I&APs;
- Announcing the Project by placing notices in newspapers, erecting site notices and circulating a Background Information Document and Reply Form to organs of state and I&APs;
- Lodging the draft Scoping Report for public review and notifying organs of state and I&APs; and
- Compiling and maintaining a CRR (contained in **Appendix G**).

14.3 Public Participation during the EIA Phase

14.3.1 *Maintenance of the Stakeholders' Database*

The database of stakeholders (contained in **Appendix F**), which includes authorities, different spheres of government (national, provincial and local), parastatals, stakeholders, landowners, interest groups, members of the general public and I&APs, was maintained during the EIA phase.

14.3.2 *Period to Review the Draft EIA Report*

In accordance with Regulation 43(1) of the EIA Regulations, organs of state and I&APs are granted an opportunity to review and comment on the draft EIA Report from **28 June 2023 until 28 July 2023**.

14.3.3 *Notification of Review of Draft EIA Report*

Organs of state and I&APs contained in the database (refer to **Appendix F**) were notified of the review of the draft EIA Report. Proof of notification will be included in the final EIA Report.

14.3.4 *I&APs' Access to the Draft EIA Report*

The draft EIA Report can be accessed as follows:

- A hardcopy of the draft EIA Report was placed at the Mangaung Public Library; and
- An electronic copy was uploaded to the following website, for downloading purposes: <https://nema.co.za/downloads/>.

The draft EIA Report was provided to the following parties, which include key regulatory and commenting authorities with jurisdiction over the receiving environment:

- DFFE (including Biodiversity Conservation Unit);
- DEDECT;
- DWS: North West Region;
- DMRE;
- NWDPR; and
- RLM.

A Comment Sheet is provided in **Appendix L**, which can be used to provide comments on the draft EIA Report.

14.3.5 Public Meeting to Present the Draft EIA Report

Anyone that has an interest in attending a public meeting will need to inform Nema Consulting in writing by **10 July 2023**. Should a public meeting be requested, a suitable date will be confirmed. Only preregistered parties that confirmed interest will receive an invitation to the public meeting.

14.3.6 Comments Received on the Draft EIA Report

The CRR will be updated with all comments received from organs of state and I&APs during the review period of the draft EIA Report. The updated CRR will be appended to the final EIA Report that will be submitted to DFFE.

14.4 Notification of DFFE Decision

Registered I&APs will be notified after having received written notice from DFFE (in terms of NEMA) on the final decision for the Project. The notification will include the appeal procedure to the decision and key reasons for the decision.

15 EIA CONCLUSIONS

15.1 Outcomes of the EIA Phase

The following key tasks were undertaken during the EIA phase for the proposed Project:

- The specialist studies identified in the Plan of Study for the EIA were undertaken and the findings were incorporated into the EIA Report in terms of understanding the environmental status quo and sensitive features, assessing the potential impacts and establishing concomitant mitigation measures, as well as identifying the preferred alternatives;
- Potentially significant impacts pertaining to the pre-construction, construction and operational phases of the Project were identified and assessed, and mitigation measures were provided; and
- Alternatives for achieving the objectives of the proposed activity were considered, and the BPEO was identified. The “no-go” option is not supported when considering the implications of not implementing the Project.

The outcomes of these tasks are captured below.

15.2 Sensitive Environmental Features

The following sensitive and significant environmental features and aspects that are associated with the Project and its receiving environment are highlighted, for which mitigation measures are included in the EIA Report and EMPr:

- The initial Aquatic and Wetland Assessment advocated that the proposed development avoid the non-perennial drainage lines, as well as their associated buffers. In response, PV Layout Alternative 1 was revised to avoid encroachment into the drainage lines. PV Layout Alternative 2 does take into account both riparian zones as well as its 32 m buffer zones and is therefore outside any freshwater sensitive features.
- In terms of the North West Conservation Plan, the project area overlaps with an ESA1, and ESA 2 areas.
- The project area lies 5 km south from Pilaesberg National Park and is thus on the edge of the 5 km Protected Area Buffer Zone of this Nature reserve.
- Based on field surveys, one SCC were recorded during the survey period, namely *Sagittarius serpentarius* (Secretarybird). Sixteen and seventeen priority species respectively were recorded in the first and second survey. These species are at risk of either habitat loss, collisions or electrocutions.
- Visual impacts are likely to be largely localised and within 5 km of the proposed project boundary, while significant visual impacts with regards to the proposed activities are expected at the sensitive receptors located within 2km of the proposed project boundary.
- No fossiliferous outcrop was detected in the proposed development.

The combined sensitivity map overlaid with the Project's layout and BPEO is provided in **Figure 76 and 77** below. Key environmental features that contributed toward the sensitive areas shown in the map included watercourses and their associated buffer zones, as well as avifaunal habitats, as determined by the relevant specialist studies.

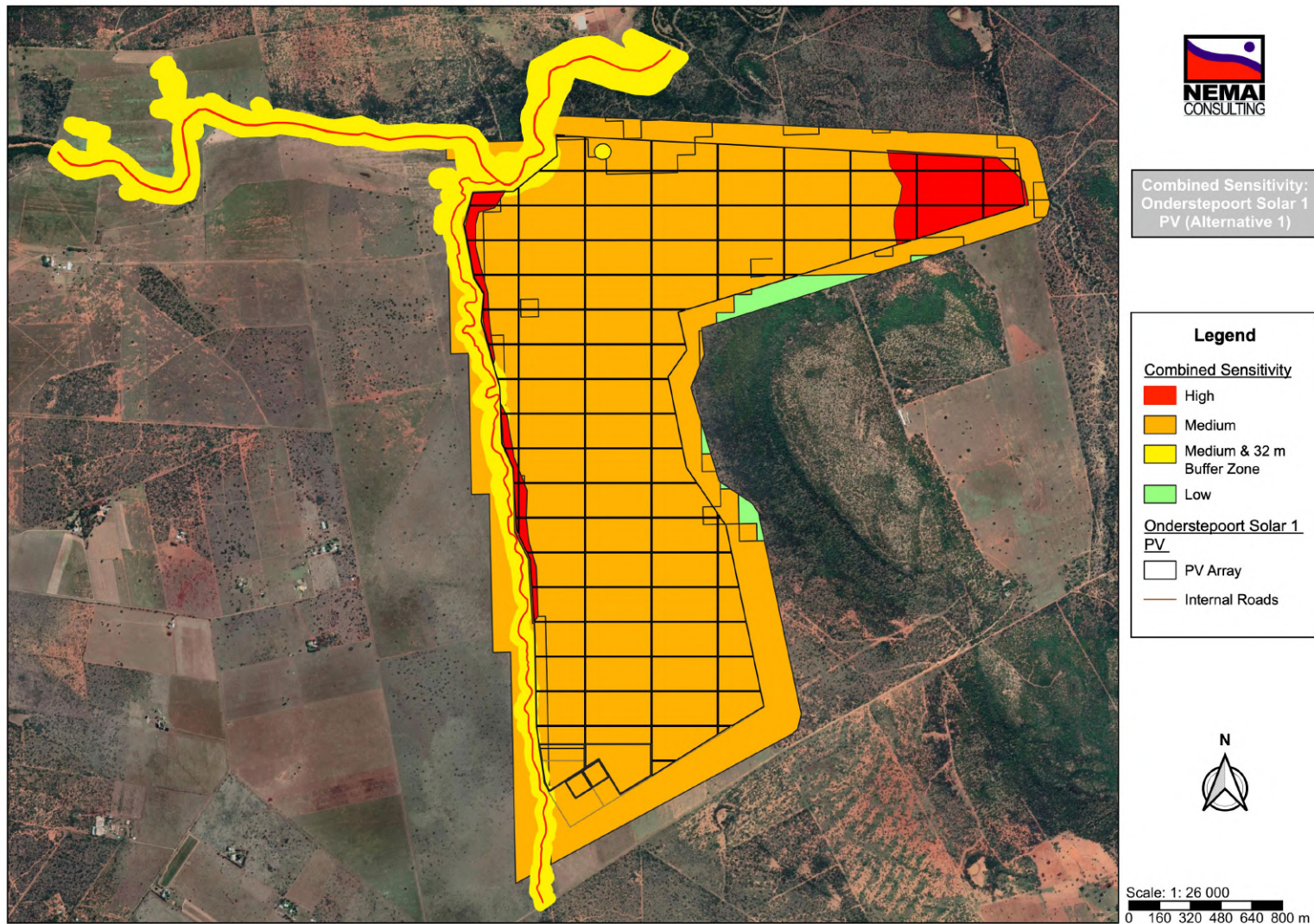


Figure 76: Combined sensitivity map of Layout Alternative 1

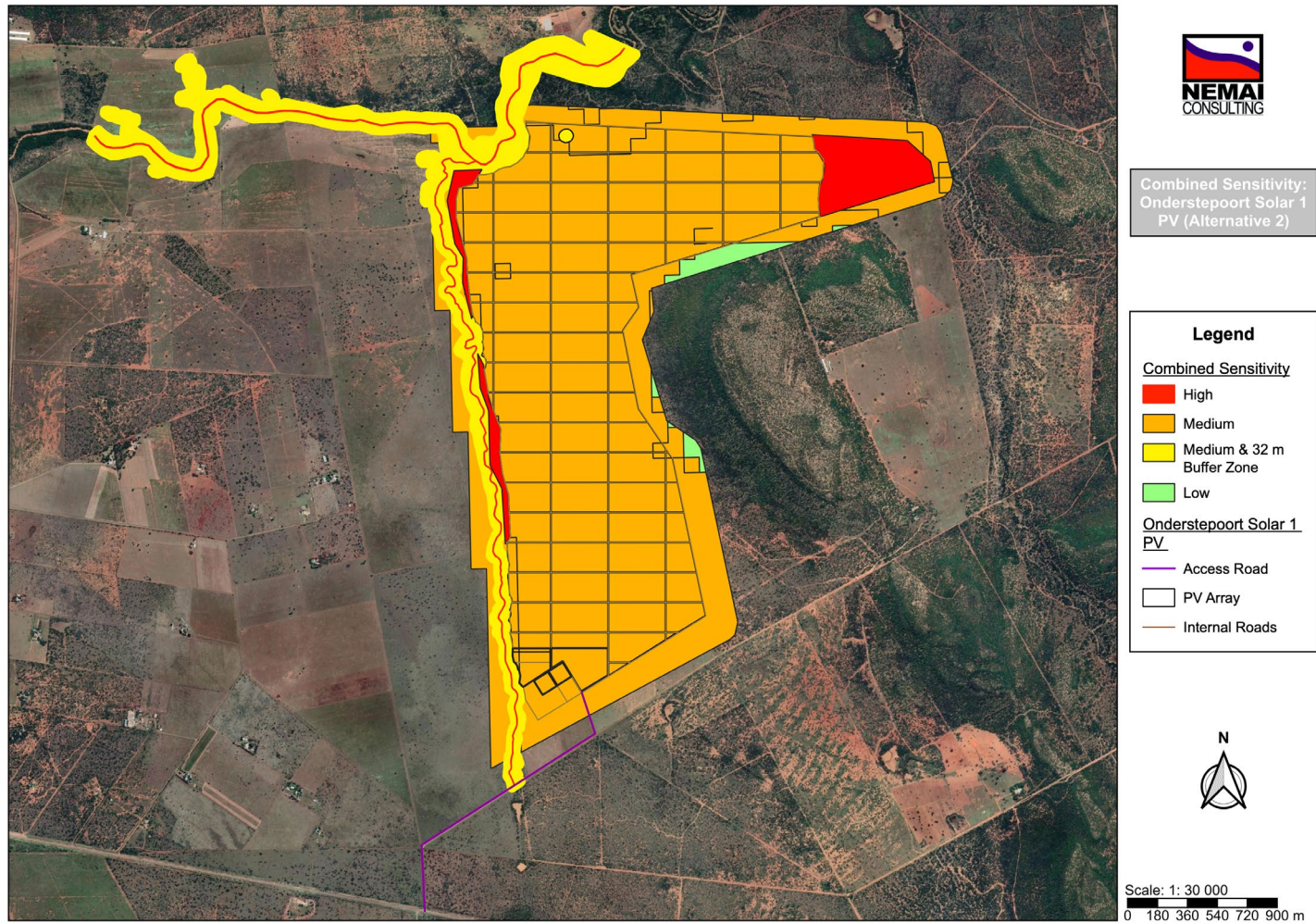


Figure 77: Combined sensitivity map of Layout Alternative 2, the identified BPEO

15.3 Environmental Impact Statement

The Project's strategic intent is linked to the SA Government's pursuit of promoting the country's renewable energy development imperatives, which encourages the role of Independent Power Producers (IPPs) to feed into the national grid. In this regard, the Applicant intends to bid for the current and future REIPPPP bid windows and/or other renewable energy markets within SA.

The rationale for the siting of the Project is based on its suitable geographic location, including the area's favourable solar irradiation levels, short distance to grid connection point, flat topography, suitable site access and availability of land. The initial PV Layout was revised to minimise encroachment into the non-perennial drainage lines and sensitive ecology features and their buffer areas.

Based on the recommendations of the specialists, technical considerations, feedback from I&APs and the comparison of the impacts, PV Layout Alternative 2 was identified as the BPEO.

The potentially significant environmental impacts were investigated through the relevant specialist studies. Key findings from the EIA, apart from the sensitive environmental features and aspects listed in **Section 16.2** above, which may also influence the conditions of the Environmental Authorisation (if granted), include the following:

- Terrestrial Ecology –
 - If high sensitivity cannot be avoided, the necessary permits must be obtained to destroy, rescue, or relocate plants. For each protected plant destroyed, another individual must be propagated and replanted in a suitable area to mitigate the loss.
 - 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. 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. 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.
- No towers are to be located within watercourses.
- Adhere to the requirements of the NWDPRP for the Lindleyspoort Road (off the R565) and other tertiary roads impacted by the development.
- The Risk Assessment undertaken for the BESS technology selected must be appended to the Operational EMPr.

The Project is considered to be compatible with existing land uses encountered in the area. The impacts and risks assessed as part of the EIA process that was undertaken for the Project are considered manageable with the effective implementation of the measures stipulated in this EIA Report and EMPr.

With the selection of the BPEO, the adoption of the mitigation measures included in the EIA Report and the dedicated implementation of the EMPr, it is believed that the significant environmental aspects and impacts associated with this Project can be suitably mitigated. With the aforementioned in mind, it can be concluded

that there are no fatal flaws associated with the Project and that authorisation can be issued, based on the findings of the specialists and the impact assessment, through the compliance with the identified environmental management provisions.

It is further the opinion of the EAP and EIA team that the EIA was executed in an objective manner and that the process and EIA Report conform to the requirements stipulated in the EIA Regulations.

The period for which the EA is required is 10 years.

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APPENDICES
