

APPENDIX 7
SPECIALIST MOTIVATIONS REGARDING THE STATUS OF THE ENVIRONMENTAL ASPECTS

14 October 2022

Ref: 671HIA-001

Environmental Impact Management Services Pty Ltd
8 Dalmeny Road,
Pine Park,
Randburg,
South Africa

Attention: GP Kriel

PART 1 ENVIRONMENTAL AUTHORISATION (EA) AMENDMENT PROCESS FOR EXTENDING THE VALIDITY OF THE EA BY AN ADDITIONAL 3 YEARS FOR THE AUTHORISED MULILO STRUISBULT PV2 FACILITY, LOCATED NEAR PRIESKA IN THE SIYATHEMBA LOCAL MUNICIPALITY, PIXLEY KA SEME DISTRICT MUNICIPALITY IN THE NORTHERN CAPE PROVINCE OF SOUTH AFRICA – HERITAGE SPECIALIST OPINION

1. INTRODUCTION

PGS Heritage (Pty) Ltd (PGS), a heritage specialist consultancy, was requested to evaluate the request to extend the validity of the Environmental Authorisation by an additional 10 years for the Mulilo Struisbult PV2 facility (DFFE Reference No.: 12/12/20/2502). Dr Jayson Orton completed the original Heritage Impact Assessment in 2012

2. PROJECT DESCRIPTION

Mulilo Renewable Project Developments (Pty) Ltd (Mulilo), was issued with an Environmental Authorisation (EA) for the proposed Struisbult PV2 Facility close to Prieska in the Siyathemba Local Municipality, Pixley ka Seme District Municipality in the Northern Cape Province of South Africa on 01 October 2012 (DFFE Reference No.: 12/12/20/2502).

After the issuing of the original EA in October, the following amendments have been undertaken and granted for the authorised SEF:

- 2013/03/28: Name Change Amendment: 12/12/20/2502
- 2013/10/01: Name Change Amendment: 12/12/20/2502
- 2015/10/07: Struisbult PV2 EA Extension: 12/12/20/2502/AM2
- 2017/12/11: Struisbult PV2 EA Extension: 12/12/20/2502/AM3

- 2020/12/10: Struisbult PV2 EA Extension: 12/12/20/2502/AM4

The last EA Extension extended the validity of the EA to 2 January 2023.

The Struisbult PV2 (PV) Solar Energy Facility is to be constructed on Portion 1 of the Farm No 104, near Copperton in the Northern Cape Province.

The following infrastructure have been authorised by the DFFE:

- Solar PV facility with a capacity to generate 100MW
- Upgrading of existing internal farm roads and construction of new roads to accommodate construction vehicles and access to the site;
- Construction of a 132 kV transmission line to connect the proposed PV plant with Eskom's grid via the Cuprum Substation located to the southwest of the study area;
- Construction of an electrical fence to prevent illegal trespassing, as well as to keep livestock from roaming between the solar arrays and causing accidental damage; and
- Construction of an office, connection centre and a guard cabin.

3. SPECIALISTS' TERMS OF REFERENCE

- A detailed motivation as to why the Department should extend the commencement period of the authorised development, including the advantages and disadvantages associated with the approval or refusal to the request for extension.
- The status (baseline) of the environment (social and biophysical) that was assessed during the initial assessment (by the relative specialist, if applicable);
- The current status of the assessed environment (social and biophysical) (by the relative specialist, if applicable).
- A review of all specialist studies undertaken, and a detailed assessment, including a site verification report providing an indication of the status of the receiving environment (by the relative specialist, if applicable);
- The terms of reference for the specialist reports and declaration of interest of each specialist must be provided.
- The report mentioned above, must indicate if the impact rating as provided in the initial assessment remains valid; if the mitigation measures provided in the initial assessment are still applicable; or if there are any new mitigation measures which need to be included into the EA, should the request to extend the commencement period be granted by the Department.
- An indication if there are any new assessments/guidelines which are now relevant to the authorised development which were not undertaken as part of the initial assessment, must be taken into consideration and addressed in the report.

- A description and an assessment of any changes to the environment (social and biophysical) that has occurred since the initial EA was issued;
- A description and an assessment of the surrounding environment, in relation to new developments or changes in land use which might impact on the authorised project, the assessment must consider the following:
 - similar developments within a 30km radius.
 - Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.
 - Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
 - The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
 - A cumulative impact environmental statement on whether the proposed development must proceed.

4. ANY NEW GUIDELINES/ PROTOCOLS

None

5. CURRENT BASELINE HERITAGE STATUS

No significant change to the baseline heritage environment has occurred since the original assessment. PGS has completed various other studies in the surrounding area and for the grid connection associated with the Struisbult PV2 facility (2022).

Findings relating to cultural heritage and palaeontology (2012) for the project are still applicable.

6. MOTIVATION FOR EXTENDING THE VALIDITY EXTENSION

The Struisbult PV2 facility was issued an Environmental Authorisation (EA) during 2013 by the Department of Forestry, Fisheries and the Environment (DFFE Ref: 12/12/20/2502). The Applicant wishes to extend the validity of the Environmental Authorisation to 02 January 2025.

The proposed project was earmarked for construction to commence in 2022 for a private off-taker until an Eskom Cost Estimate Letter (CEL) greatly increased the scope of self-build infrastructure required for the project to connect to the grid. The cost implications of the CEL scope increase made the project

unfeasible for the proposed private off-taker. EA validity extension is being sought to allow this project which is near construction-readiness to be bid in upcoming renewable energy tender processes, specifically Bid Window 6 and 7 of the REIPPP programme.

Extension of the validity of the EA will ensure that the EA remains valid for the undertaking of the authorised activities such that the project can be bid into future bidding rounds of the REIPPP Programme or similar programmes.

7. SPECIALIST COMMENT

We note that no changes to the layout and infrastructure from the original layouts are proposed and only the extension of the EA.

Our evaluation of the original HIA and PIA and subsequent documentation has shown that we envisaged no changes to the projected impact. We have further evaluated the cumulative impact related to the number of other proposed wind and solar renewable projects in the vicinity of the approved Struisbult PV2 Facility (**Figure 1**).

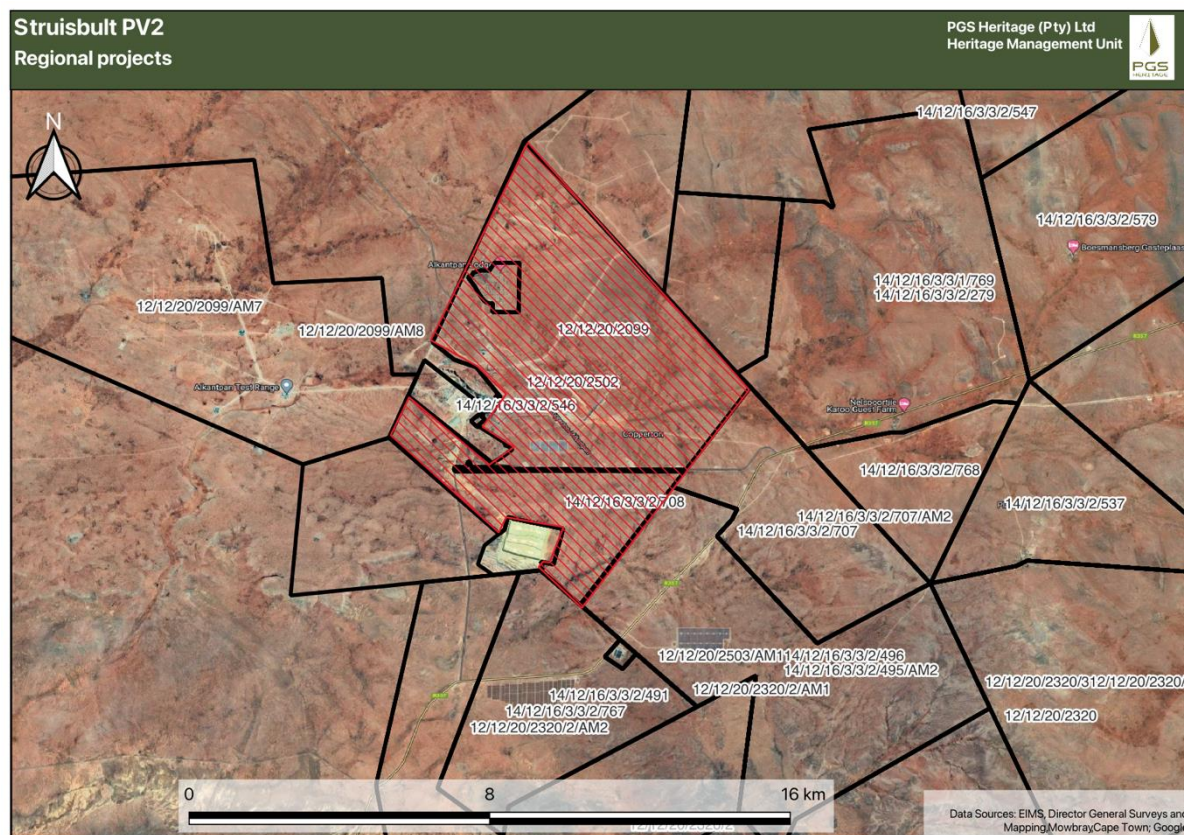


Figure 1 - Surrounding projects

The cumulative impact on cultural heritage resources would potentially change since the project's inception in 2012. However, no cumulative impact assessment was done in 2012. It must be considered that the whole of the Copperton area is being developed for Renewables Energy Projects. Still, the occurrence of cultural heritage resources is considered to be low and localised and managed through the recommendation from the HIA and PIA contained in the EMPR for the project.

The management measures as included in the HIA and PIA (2012) remain true and need to be implemented and are listed below:

Palaeontology

As far as fossil heritage is concerned, the impact significance of the proposed solar energy facility is considered to be LOW for the following reasons:

- *The Precambrian basement rocks are entirely unfossiliferous;*
- *The Karoo Supergroup bedrocks here are deeply weathered and at most sparsely fossiliferous;*
- *The development footprints for both the preferred and alternative sites are small and largely underlain by superficial deposits of low palaeontological sensitivity;*
- *Significant fossil material (e.g. mammal remains) at or near surface is probably very sparsely distributed within the study area; and*
- *Extensive, deep bedrock excavations are not envisaged during the construction phase.*

Potential impacts on fossil heritage are confined to the development footprint and are only anticipated, if at all, during the construction phase. There is no preference on fossil heritage grounds for the preferred versus alternative development area within the boundaries of Struisbult Farm. Neither of these sites has fatal flaws in palaeontological heritage terms. A number of other alternative energy projects – including both wind energy and solar energy facilities – have been proposed for the Copperton area (cf Almond 2010a, 2010b, 2011a, 2011b, 2012a, 2012b; Gresse & Corbett 2012). Given the generally low palaeontological sensitivity of the Karoo bedrocks and Pleistocene to Recent superficial sediments in the region as a whole, the cumulative impact of these developments is not considered to be of high significance.

It is recommended that:

- *The ECO responsible for the development should be aware of the possibility of important fossils (e.g. mammalian bones, teeth) being present or unearthed on site and should monitor all substantial excavations into superficial sediments as well as fresh (i.e. unweathered) sedimentary bedrock for fossil remains;*
- *In the case of any significant fossil finds (e.g. vertebrate teeth, bones, burrows, petrified wood) during construction, these should be safeguarded - preferably in situ - and reported*

by the ECO as soon as possible to the relevant heritage management authority (SAHRA, Cape Town) so that any appropriate mitigation (i.e. recording, sampling or collection) by a palaeontological specialist can be considered and implemented, at the developer's expense; and

- *These recommendations should be incorporated into the EMP for the Struisbult PV2 solar energy facility project.*

Archaeology

A background scatter of Early Stone Age (ESA) and Middle Stone Age (MSA) artefacts was found across the site and is of very low archaeological significance. Several discrete Later Stone Age (LSA) sites were found focused around Perdepan. These sites are more significant and would require mitigation should they be under threat. Furthermore, evidence from elsewhere suggests that the possibility of finding important subsurface material close to pans exists. No buildings exist on the site and no cultural landscape elements were noted.

Visual impacts to scenic routes and sense of place will be limited due to the partial screening effect from a large berm and the presence of existing abandoned mining infrastructure in the vicinity.

Archaeological impacts are assessed as being of high significance for both alternatives but Low with mitigation. Impacts of visual concern are rated as of Low significance and no mitigation is suggested. Impacts to heritage resources are not considered to be highly significant and it is thus concluded that the project may proceed but subject to the following recommendations:

- *The suggested archaeological mitigation should be implemented as necessary;*
- *Test excavations around the pan should be done to check for buried archaeological material (if development encroaches within 100 m of the pan margin but excluding for access roads);*
- *Transmission lines should stay at least 100 m away from the edge of any pans implicated in the final route; and*
- *If any human remains are uncovered during development then work in the immediate vicinity should*

8. CONCLUSION

It is our considered opinion that the extension of the EA for the authorised Struisbult PV2 Facility will not have any additional impacts on the heritage resources inventory identified for the project as part of

the original heritage studies. We conclude that this proposed extension of the EA can proceed from a heritage perspective.

Any enquiries can be submitted to Wouter Fourie at wouter@pgsheritage.com.

A handwritten signature in black ink, appearing to read 'Wouter Fourie', is written over a light blue horizontal line.

Wouter Fourie

Accredited Professional Heritage Practitioner (APHP), Accredited Professional Archaeologist (ASAPA)

Director – PGS Heritage

APPENDICES

Appendix 1: Specialists declaration of Interest (signed by a Commissioner of Oaths)

Appendix 2: Specialist CVs

Appendix 1: Specialists declaration of Interest (signed by a Commissioner of Oaths)

Appendix 2: Specialist CVs



WOUTER FOURIE

Professional Heritage Practitioner

PROFILE

I am involved in heritage resources management for the past 20 years acting as a specialist consultant on various high-profile projects involving heritage and archaeology. I aim to develop tailor-made heritage solutions to the mining, water and oil and gas industries. I have worked in various African countries, including South Africa, Lesotho, Mozambique, Mauritius, Malawi and the DRC.

I thrive on developing and implementing heritage projects in new territories and with these securing local partnerships that enable skill development for local graduates.

CONTACT

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+258 84 774 6768

WEBSITE:
www.pgsheritage.com

EMAIL ADDRESS:
wouter@pgsheritage.com



EDUCATION

University of Pretoria

1993-1996

BA Degree - Majors in Archaeology, Anthropology and Geography

University of Pretoria

1997

BA Hon Archaeology, with further specialisation in environmental management.

University of Cape Town

2016 - present

MPhil Conservation of the Built Environment

WORK EXPERIENCE

PGS Heritage Group of Companies - Director - Heritage Specialist

2003- present

I am actively involved in the management of the business and focus on marketing and new business for PGS, specifically the broader SADC region. Acting as heritage specialist in multidisciplinary teams

The University of the Witwatersrand - Project Manager - Archaeological Contracts Unit

2007-2008

Responsible for conducting heritage and archaeological impact studies, archaeological excavations and general management of the unit

Matakoma Consultants - Director - Heritage Specialist

2000 - 2008

Heritage specialist and Director responsible for heritage and archaeological impact studies

Randfontein Estate Gold Mine - Environmental Coordinator

Oct 1998- Feb 2000

Coordinating all environmental Rehabilitation work

Department of Minerals and Energy Environmental Officer

Oct 1997 - Sept 1998

PROFESSIONAL AFFILIATION

Accredited Professional Heritage Practitioner

Association of Professional Heritage Practitioners
Since 2014

Accredited Professional Archaeologist

Association of Southern African Professional Archaeologists -
Since 2001



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

DETAILS OF THE SPECIALIST, DECLARATION OF INTEREST AND UNDERTAKING UNDER OATH

File Reference Number:
NEAS Reference Number:
Date Received:

(For official use only)

DEA/EIA/

Application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

PROJECT TITLE

Mulilo Struisbult PV2

Kindly note the following:

1. This form must always be used for applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting where this Department is the Competent Authority.
2. This form is current as of 01 September 2018. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at <https://www.environment.gov.za/documents/forms>.
3. A copy of this form containing original signatures must be appended to all Draft and Final Reports submitted to the department for consideration.
4. All documentation delivered to the physical address contained in this form must be delivered during the official Departmental Officer Hours which is visible on the Departmental gate.
5. All EIA related documents (includes application forms, reports or any EIA related submissions) that are faxed; emailed; delivered to Security or placed in the Departmental Tender Box will not be accepted, only hardcopy submissions are accepted.

Departmental Details

Postal address:

Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Private Bag X447
Pretoria
0001

Physical address:

Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Environment House
473 Steve Biko Road
Arcadia

Queries must be directed to the Directorate: Coordination, Strategic Planning and Support at:
Email: EIAAdmin@environment.gov.za

1. SPECIALIST INFORMATION

Specialist Company Name:	PGS Heritage Pty Ltd		
B-BBEE	Contribution level (indicate 1 to 8 or non-compliant)	4	Percentage Procurement recognition
Specialist name:	Wouter Fourie		
Specialist Qualifications:	BA Hon Archaeology		
Professional affiliation/registration:	APHOP ASAPA		
Physical address:	906 Bergarend street, Waverley, Pretoria		
Postal address:	PO Box 32542, Totiusdal		
Postal code:	0134	Cell:	
Telephone:	012 3325305	Fax:	
E-mail:	wouter@pgsheritage.com		

2. DECLARATION BY THE SPECIALIST

I, Wouter Fourie, declare that –

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- all the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.



Signature of the Specialist

PGS Heritage

Name of Company:

Date

25/11/2022

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, W. Fourie, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.



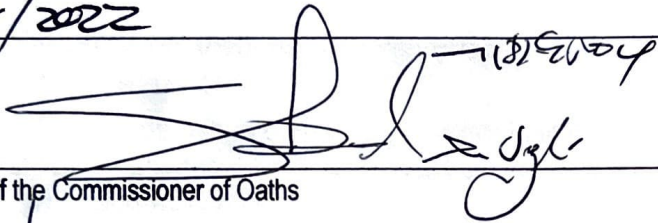
Signature of the Specialist

POS HERITAGE .

Name of Company

25/11/2022

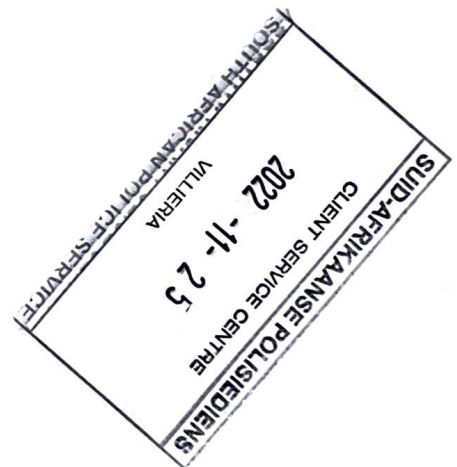
Date



Signature of the Commissioner of Oaths

25/11/2022

Date



18 November 2022

MULILO RENEWABLE PROJECT DEVELOPMENTS PROPRIETARY

GP Kriel gp@eims.co.za

To whom it may concern:

ECOLOGICAL SPECIALIST INPUT FOR THE PART 1 AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (EA) FOR THE 100MW PHOTOVOLTAIC (PV) SOLAR ENERGY FACILITY (PV2) ON THE FARM STRUISBULT (PORTION 1 OF FARM NO. 104) IN THE SIYATHEMBA LOCAL MUNICIPALITY NEAR COPPERTON IN THE NORTHERN CAPE PROVINCE.

- 1 The 2011 Botanical Impact Assessment, conducted by Dr D McDonald (Bergwind Botanical Surveys and Tours) and 2012 Bird Impact Assessment by A Jenkins (Avisense Consulting) as part of the Environmental Impact Assessment (EIA) for the proposed Photovoltaic Energy Plant on Struisbult Farm Near Copperton, Northern Cape (DEA REF. NO. 12/12/20/2502), refers.
- 2 The two abovementioned studies as part of the Environmental Authorisation process (DEA REF. NO. 12/12/20/2502) have been reviewed by The Biodiversity Company who conducted a site walkdown assessment in February 2022.
- 3 The construction date for the Struisbult Renewable Energy Facility is not yet finalized. However, to optimize the proposed project, the following amendments are applied for in terms of the EIA Regulations, 2012:
 - 3.1. It is being requested that the validity of the Environmental Authorisation be extended by an additional 3 years.
- 4 This validity extension requires that the respective specialist studies hitherto undertaken as part of the original EA process must be reviewed by respective specialists in order to ascertain whether conditions on site have changed. This letter serves this purpose.
- 5 Conclusions from the 2011 Botanical Impact Assessment report included the following:
 - 5.1. Construction of a solar energy plant at Struisbult Farm 104/1 on the Alternative 1 (preferred) footprint would result in LOW NEGATIVE impact in terms of loss of vegetation and ecological processes. Alternative 2 would however result in a MODERATE NEGATIVE impact in terms of vegetation loss due to the possibility of affecting the protected plant species listed above.
 - 5.2. The overall result of the impact assessment is that the 'No Go' option would allow the status quo to continue which would have a LOW NEGATIVE impact on the site. The proposed renewable energy infrastructure development would have a LOW NEGATIVE impact, after mitigation, on most of the study area and can in general be supported from a botanical perspective.

- 5.3. With mitigation measures applied as recommended, development of a solar energy plant on the Alternative 1 (300 ha) site at Struisbult 104/1 is supported from a botanical perspective.
- 6 Conclusions from the 2011 Bird Impact Assessment report included the following:
- 6.1. The proposed PV Facility is likely to have little, if any significant, long-term impact on the avifauna of the area, after mitigation.
- 6.2. Careful and responsible implementation of the required mitigation measures should reduce construction and operational phase impacts to tolerable and sustainable levels, especially if every effort is made to monitor impacts throughout, to learn as much as possible about the effects of solar energy developments on South African avifauna, and to implement mitigation measures suggested as a result of ongoing monitoring.
- 7 Conclusions from the 2022 Terrestrial Ecology Walkdown report included the following:
- 7.1. The mitigation measures prescribed for the original Environmental Authorisation by Aurecon (2012) and Aurecon (2012a) remain applicable for the development and must be adhered to.
- 7.2. Avifaunal disturbance mitigation measures and long-term monitoring must be put in place and take action as according to Avisense (2012), specifically in line with sections 10 and 12 of the report. As per section 6.1 of Aurecon (2012a), an avifaunal specialist must be appointed to develop and undertake an avifauna monitoring programme that aligns with the requirements set in the Avisense (2012) report. This is especially critical due to the numerous species of conservation concern (SCC) bird species recently and historically recorded within and nearby to the project area.
- 7.3. The mitigation measures prescribed by Bergwind (2011) are now largely considered inadequate and must be supplemented and re-prioritised in accordance with the updated measures presented in the walkdown report.
- 7.4. All watercourses and any rocky outcrops must be avoided as much as possible. Avoid fragmenting any sensitive habitats.
- 8 Mitigation measures prescribed by each of the reviewed specialist reports remains applicable and must be adhered to. Recommended monitoring must be undertaken, specifically:
- 8.1. The construction phase should be closely monitored by an Environmental Control Officer who should identify any areas that would require rehabilitation in the post-construction phase ((Bergwind, 2012).
- 8.2. A comprehensive programme must be put forward to fully monitor and research the actual impacts of the PV Facility on the broader avifauna of the area, from preconstruction and into the operational phase of the development (Avisense Consulting, 2012).

- 9 In order to manage the impacts effectively, the following mitigation management should be put into place for the general impacts associated with flora and fauna:

Impact Management Actions	Implementation	
	Phase	Responsible Party
Sensitive area (drainage lines) must be avoided and access roads, and a no-go buffer of 20 m, must be applied around them.	Life of operation	Project manager, Environmental Officer
Clearing of vegetation should be minimized and avoided where possible. All activities must be restricted to flat areas as far as possible. It is recommended that areas to be developed be specifically demarcated so that during the construction phase, only the demarcated areas be impacted upon. All disturbed footprints to be rehabilitated and landscaped after installation is complete. Rehabilitation of the disturbed areas existing in the project area must be made a priority. Topsoil must also be utilised, and any disturbed area must be re-vegetated with plant and grass species which are endemic to the project area vegetation type.	Life of operation	Project manager, Environmental Officer
Existing servitudes, access routes, and especially roads must be made use of.	Construction/Operational Phase	Environmental Officer & Design Engineer
All laydown, chemical toilets etc. should be restricted to outside of the project area. No materials may not be stored within the project area, and all materials must be removed from the project area once the construction phase has been concluded. No permanent construction structures/formwork should be permitted. No storage of vehicles or equipment will be allowed outside of the designated project areas.	Construction/Operational Phase	Environmental Officer & Design Engineer
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 should always be kept out of the project area, especially areas that have been recently re-planted.	Operational phase	Environmental Officer & Contractor
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 to take place within the project area unless necessary. All contaminated soil/yard stone shall be treated in situ or removed and placed in containers. Appropriately contain any diesel or oil storage tanks, machinery spills (e.g., accidental spills of hydrocarbons oils, diesel etc.) in such a way as to prevent them from leaking and entering the environment. Construction activities and vehicles could cause the spillage 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.	Life of operation	Environmental Officer & Contractor
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.	Life of operation	Project manager, Environmental Officer
A fire management plan needs to be complied and implemented to restrict the impact that fire might have on the surrounding areas.	Life of operation	Environmental Officer & Contractor

<p>Any protected plant that may be present needs a relocation or destruction permit for any individual that may be removed or destroyed due to the development. If left undisturbed the sensitivity and importance of these species needs to be part of the environmental awareness program. All protected and red-list plants should be relocated, along with as many other geophytic species as possible (including the observed <i>Ledebouria</i> spp.). Refer to the Plant Rescue and Protection Plan in this regard.</p>	Life of operation	Project manager, Environmental Officer
<p>A pre-construction survey should be conducted in the flowering season (July-September) to ensure that a more comprehensive floral survey is compiled. For any threatened species that may not be destroyed, it is recommended that professional service providers dealing with plant search and rescue be used to remove such plants and use them either for later rehabilitation work or other conservation projects.</p>	Planning Phase, Pre-Construction	Project manager, Environmental Officer & Contractor
<p>A qualified environmental control officer must be on site when construction begins. A site walk through is recommended by a suitably qualified ecologist prior to any construction activities, preferably during the wet season, and any SSC should be noted. 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. Should any large nests be observed within the project area construction should stop immediately and a qualified specialist must be contacted.</p>	Construction Phase	Environmental Officer, Contractor
<p>The areas to be developed must be specifically demarcated to prevent movement of staff or any individual into the surrounding environments:</p> <ul style="list-style-type: none"> • Signs must be put up to enforce this. 	Construction/Operational Phase	Project manager, Environmental Officer
<p>The duration of the construction should be minimized to as short term as possible, to reduce the period of disturbance on fauna.</p>	Construction	Project manager, Environmental Officer & Design Engineer
<p>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.</p>	Construction/Operational Phase	Environmental Officer
<p>No trapping, killing, or poisoning of any wildlife is to be allowed:</p> <ul style="list-style-type: none"> • Signs must be put up to enforce this. 	Life of operation	Environmental Officer
<p>All construction and maintenance motor vehicle operators should undergo an environmental induction that includes instruction on the need to comply with speed limits, to respect all forms of wildlife. Speed limits must still be enforced to ensure that road killings, dust and erosion is limited. The speed limits should be restricted to a maximum of 30 km/h within the project area.</p>	Life of operation	Health and Safety Officer
<p>Outside lighting should be designed and limited to minimize impacts on fauna. All outside lighting should be directed away from highly sensitive areas. Fluorescent and mercury vapor lighting should be avoided, and sodium vapor (green/red) lights should be used wherever possible.</p>	Construction/Operational Phase	Project manager, Environmental Officer & Design Engineer
<p>Schedule activities and operations during least sensitive periods, to avoid migration, nesting and breeding seasons:</p> <ul style="list-style-type: none"> • Driving on access roads at night should be restricted in order to reduce or prevent wildlife road mortalities which occur more frequently during this period. 	Life of operation	Project manager, Environmental Officer & Design Engineer
<p>Any holes/deep excavations must be dug and planted in a progressive manner and should not be left open overnight:</p> <ul style="list-style-type: none"> • Should the holes remain open overnight they must be covered temporarily to ensure no small fauna species fall in. 	Planning and Construction	Environmental Officer & Contractor, Engineer
<p>Ensure that cables and connections are insulated successfully and adequately to reduce electrocution risk.</p>	Life of project	Environmental Officer & Contractor, Engineer

Monitoring of all overhead line routes must be undertaken to detect bird carcasses, to enable the identification of any potential areas of high impact which are to be marked with bird flappers if not already done so. Monitoring should be undertaken at least once a month for the first year of operation.	Life of project	Environmental Officer & Contractor
Compilation of and implementation of an Alien Invasive Plant Management Plan for the project area.	Life of operation	Project manager, Environmental Officer & Contractor
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. The footprint of the roads must be kept to prescribed widths.	Construction/Operational Phase	Project manager, Environmental Officer & Contractor
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 from entering the site	Life of operation	Environmental Officer & Health and Safety Officer
A pest control plan must be put in place and implemented; it is imperative that poisons not be used due to the presence of faunal SCC in the area.	Life of operation	Environmental Officer & Health and Safety Officer
Dust-reducing mitigation measures must be put in place and must be strictly adhered to. This includes wetting of exposed soft soil surfaces: <ul style="list-style-type: none"> No non-environmentally friendly suppressants may be used as this could result in the pollution of valuable water sources. 	Life of operation	Contractor
Waste management must be a priority and all waste must be collected and stored effectively.	Life of operation	Environmental Officer & Contractor
Litter, spills, fuels, chemical and human waste in and around the project area must be cleared and safely/appropriately stored immediately.	Construction/Operation/Closure Phase	Environmental Officer & Health and Safety Officer
A minimum of one toilet must be provided per 10 persons. Portable toilets must be pumped dry to ensure the system does not degrade over time and spill into the surrounding area.	Life of operation	Environmental Officer & Health and Safety Officer
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.	Life of operation	Environmental Officer & Health and Safety Officer
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 or stored in pits.	Life of operation	Environmental Officer, Contractor & Health and Safety Officer
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.	Life of operation	Environmental Officer, Contractor & Health and Safety Officer
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 (watercourses) and to inform contractors and site staff of the presence of red-listed faunal species, their identification, conservation status and importance, biology, habitat requirements and management requirements in line with the Environmental Authorisation and within the EMP. The avoidance and protection of the high sensitivity areas must be included in a site induction. Contractors and employees must all undergo the induction and be made aware of the “no-go” areas to be avoided.	Life of operation	Health and Safety Officer

<p>Speed limits of 30 km/h must be put in place to reduce erosion:</p> <ul style="list-style-type: none"> Dust generated, especially by earth moving machinery, must be minimised through wetting of the soil surface and putting up signs to enforce speed limits. Speed bumps must be built to force slow speeds; Signs must be put up to enforce this. 	Life of operation	Project manager, Environmental Officer
<p>Where possible, existing access routes and walking paths must be made use of.</p>	Life of operation	Project manager, Environmental Officer
<p>Areas that are denuded during construction need to be re-vegetated with indigenous vegetation to prevent erosion during flood events and strong winds. This is to be done according to the Re-vegetation and Habitat Rehabilitation Plan.</p>	Life of operation	Project manager, Environmental Officer
<p>A stormwater management plan must be compiled and implemented.</p>	Life of operation	Project manager, Environmental Officer

9.1. The following management plans have been compiled for the facility and must be implemented:

- 9.1.1.1. Alien Invasive Plant Management Plan.
- 9.1.1.2. Re-vegetation and Habitat Rehabilitation Plan.
- 9.1.1.3. Plant Rescue and Protection Plan.

10 The desktop terrestrial biodiversity theme sensitivity for the area is 'Very High' due to the presence Ecological Support Area and the Freshwater Ecological Priority Area (FEPA) Sub catchment. A baseline assessment (January 2022) determined the sensitivity of the shrubland habitat to be 'Medium', with drainage features assigned a 'High' sensitivity. The drainage features is not located within the planned development area.

11 It is further understood that a detailed monitoring Avifaunal Monitoring Programme has been prepared and monitoring undertaken by Wildskies Environmental Services during 2022 in compliance with the recommendations of the recommendations of section 6.1 of Aurecon (2012a).

12 All prescribed mitigation measures and supporting recommendations presented here will help to achieve an acceptable residual impact. These measures and recommendations will remain applicable for the requested extension of the EA. To this end, these measures have been included in the updated EMPr for this development as per the requirements of the Environmental Authorisation.

13 As such, should the measures described above, and as included in the updated EMPr for this development be implemented, it is the reasoned opinion of the specialist that the Environmental Authorisation be extended for an additional 3 years.

14 We trust you find the above in order. If there are any uncertainties or additional information required, please feel free to contact the undersigned.

Kind regards,



Andrew Husted

Project Management (SACNASP 400213/11)

info@thebiodiversitycompany.com



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

DETAILS OF THE SPECIALIST, DECLARATION OF INTEREST AND UNDERTAKING UNDER OATH

File Reference Number:
NEAS Reference Number:
Date Received:

(For official use only)

DEA/EIA/

Application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

PROJECT TITLE

Mulilo Struisbult PV2

Kindly note the following:

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2. This form is current as of 01 September 2018. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at <https://www.environment.gov.za/documents/forms>.
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Attention: Chief Director: Integrated Environmental Authorisations
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Arcadia

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Email: EIAAdmin@environment.gov.za

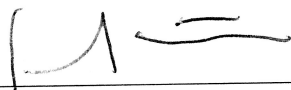
1. SPECIALIST INFORMATION

Specialist Company Name:	THE BIODIVERSITY COMPANY		
B-BBEE	Contribution level (indicate 1 to 8 or non-compliant)	4	Percentage Procurement recognition
			100%
Specialist name:	ANDREW HUSTED		
Specialist Qualifications:	MSc AQUATIC HEALTH		
Professional affiliation/registration:	SACNASP 400213/11		
Physical address:	777 PERIDDT STREET, JUKSKEI PARK, RANDBURG		
Postal address:	2148		
Postal code:	2148	Cell:	081 319 1225
Telephone:		Fax:	
E-mail:	andrew@thebiodiversitycompany.com		

2. DECLARATION BY THE SPECIALIST

I, ANDREW HUSTED, declare that -

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- all the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.



 Signature of the Specialist

THE BIODIVERSITY COMPANY

 Name of Company:

26/10/2022

 Date

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, ANDREW HUSTED, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.



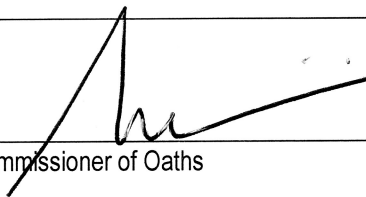
Signature of the Specialist

THE BIODIVERSITY COMPANY

Name of Company

26/10/22

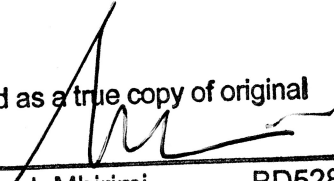
Date



Signature of the Commissioner of Oaths

Date

Certified as a true copy of original



Farai Shadrack Mbirimi **BD52805**
Minister of Religion / Commissioner of Oaths
391 11th Road, Erand, Midrand 1685

Date 26/10/2022



Mr GP Kriel
Environmental Impact Management Services (EIMS)
PO Box 19731, Tecoma, 5214

23 November 2022

RE: STRUISBULT PV 2 – AVIFAUNAL SITE SENSITIVITY VERIFICATION REPORT & MOTIVATION

Background to project

The Struisbult PV2 facility was issued an Environmental Authorisation (EA) during 2013 by the Department of Forestry, Fisheries and the Environment (DFFE Ref: 12/12/20/2502), and has been amended several times to remain current. The Applicant (Struisbult PV2 (Pty) Ltd) wishes to extend the validity of the Environmental Authorisation to 02 January 2025.

The proposed project was earmarked for construction to commence in 2022 for a private off-taker until an Eskom Cost Estimate Letter (CEL) greatly increased the scope of self-build infrastructure required for the project to connect to the grid. The cost implications of the CEL scope increase made the project unfeasible for the proposed private off-taker. EA validity extension is being sought to allow this project which is near construction-readiness to be bid in upcoming renewable energy tender processes, specifically Bid Window 7 of the REIPPP programme.

WildSkies Ecological Services was appointed by Environmental Impact Management Services (EIMS) to assist with this application in terms of avifauna.

Avifaunal studies to date

The avifaunal studies on site to date are summarised below:

1. The avifaunal impact assessment was conducted by Avisense (undated – but likely 2012) and was entitled “Struisbult PV Energy Facility – Avian Impact Assessment”.



2. Subsequently, the Applicant contracted JAH Environmental Consultancy (2013) to conduct pre-construction bird monitoring on the site (Pre-construction monitoring of bird populations at a PV facility near Copperton, Northern Cape: final report. Prepared by James Harrison for Mulilo-Gestamp Renewable Energy, Cape Town April 2013).
3. In 2021-2022 pre-construction bird monitoring was repeated on the site to ensure that current best practice was met, that nothing significant had changed on site with respect to the avifaunal community, and in compliance with the Environmental Authorisation conditions.

This monitoring consisted of the following:

- Two seasonal site visits, one of which was in summer, compliant in all respects with the best practice guidelines for this type of work (Jenkins *et al*, 2017).

Key findings of this study were as follows:

- *There are no new significant findings emerging from the second round of pre-construction monitoring. There is no need to change either layout or the previously recommended mitigation measures.*
- *There are no significant changes to the avifaunal community on and near site since the previous pre-construction bird monitoring.*
- *There is no need for any changes to the proposed layout from an avifaunal perspective.*
- *There are no avifaunal receptors which require construction phase monitoring.*
- *Operational phase monitoring will however be required as stipulated in the best practice guidelines (Jenkins *et al*, 2017). This monitoring should be supervised by an independent avifaunal specialist. The fatality search component could possibly be done by facility staff under the specialist's supervision. The framework for such monitoring is as follows:*
 - *For Regime 2 projects, post construction bird monitoring is necessary in order to:*
 - a. *Determine the actual impacts of the facility*
 - b. *Determine if additional mitigation is required*
 - c. *Learn about impacts and improve future assessments*

- *Post construction monitoring should be started as soon as the facility becomes operational*
 - *Post construction monitoring can be divided into three sections:*
 - a. *Habitat classification (this is a once off exercise)*
 - b. *Replicating pre-construction baseline monitoring (2 x site visits of 3 days each, one in peak season)*
 - c. *Estimating bird mortalities. This will include: searching a minimum of 20% of the PV panel array for bird fatalities every 14 days for the full year; estimating searcher efficiency and carcass persistence through bias trials. Fences, electrical compounds, and other key infrastructure which may kill birds should also be searched.*
 - *Operational monitoring should be done for one year, and if significant impacts recorded it can be extended to two years.*
 - *Quarterly reports summarising interim findings should be submitted to Birdlife South Africa and the DFFE.*
 - *Final year end reports with full results analysis should also be submitted to Birdlife South Africa and the DFFE.*
4. WildSkies provided input into the final layout EMPr through an avifaunal walk through of the facility conducted in 2022.

Site Sensitivity Verification (SSV)

We consulted the DFFE Online Screening Tool for the site, in accordance with GN 320 and GN 1150 (20 March 2020) of the NEMA EIA Regulations of 2014 (as amended). Prior to commencing with a specialist assessment, a Site Sensitivity Verification (SSV) must be undertaken to confirm the current land use and environmental sensitivity of the proposed project area as identified by the National Web-Based Environmental Screening Tool (i.e., Screening Tool). We examined the Screening Tool output generated by EIMS (dated 25 August 2022) and found the following:

- The Animal Theme is classed as High sensitivity (Figure 1), with Ludwig's Bustard *Neotis ludwigii* highlighted.
- The Avian Theme is classified as Low sensitivity (Figure 2). No bird species are highlighted.

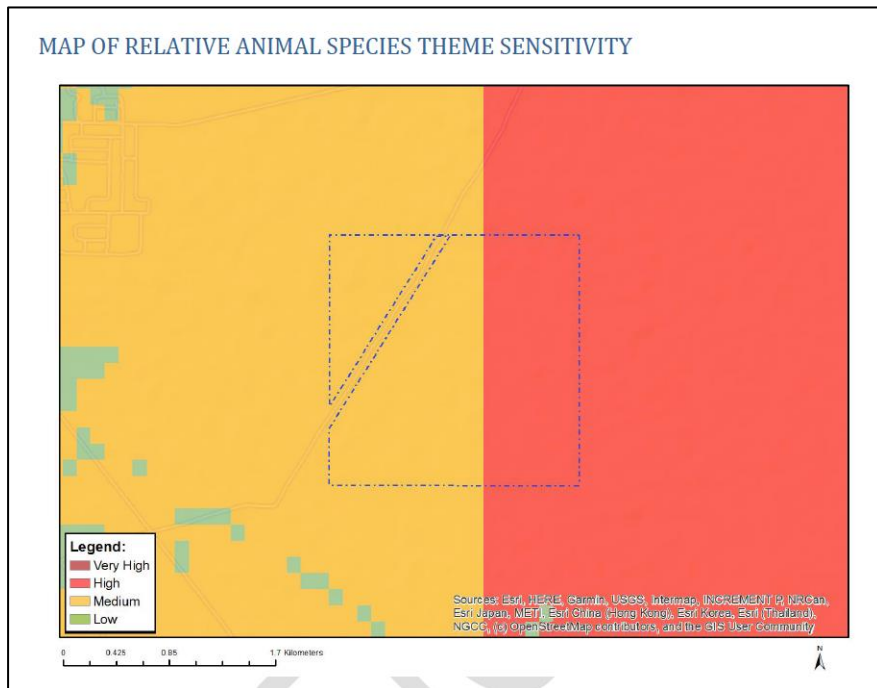


Figure 1. DFFE Screening Tool output for Animal Species Theme.

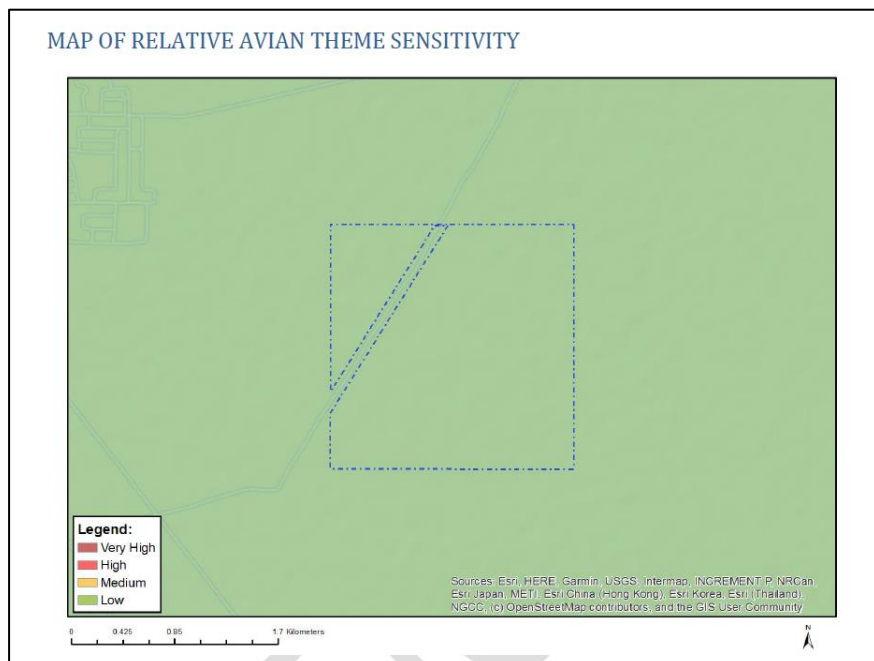


Figure 2. DFFE Screening tool output for Avian Theme.



We base this SSV on both a desktop analysis of the various avifaunal databases consulted in the Screening and Scoping Phases (e.g.: IUCN, SABAP, CWAC, CAR) as well as our comprehensive work on site as part of the pre-construction monitoring. Our on-site methodologies align with best practice requirements.

The on-site findings for the avian Species of Conservation Concern (SCC) recorded on site by our work are highlighted below. One of these species, the Ludwig's Bustard was identified as a SCC by the screening tool.

- A total of 71 bird species were recorded on and near the site during this monitoring programme, 50 species in Season 1 and 40 species in Season 2. These 71 species include six regionally Red Listed species: Ludwig's Bustard (Endangered); Verreaux's Eagle, Burchell's Courser, and Lanner Falcon (Vulnerable); and Abdim's Stork and Karoo Korhaan (Near-threatened).
- Verreaux's Eagle, Lanner Falcon and Abdim's Stork were not recorded on the site itself but within the close surrounds (<3km of the site boundary). As a result these species are judged to be likely to occur on site at times.
- Ludwig's Bustard, Karoo Korhaan and Burchell's Courser were all recorded on the site itself, as described below:
 - Several records of Ludwig's Bustard singly and in small groups on site during Season 1. This is a nomadic species which moves around the Karoo in response to rainfall and other environmental conditions. The species was not prevalent during Season 2. Ludwig's Bustard is Globally and Regionally listed as Endangered (Taylor *et al*, 2015; IUCN 2022). It is likely to be susceptible to two possible impacts associated with a solar photovoltaic facility: habitat destruction; and disturbance.
 - Multiple records of Karoo Korhaan *Eupodotis vigorsii* in pairs on site. It appears that several pairs reside in the broader area. Karoo Korhaan is classified as Near-threatened regionally and Least Concern globally (Taylor *et al*, 2015, IUCN, 2022). It is likely to be susceptible to two possible impacts associated with a solar photovoltaic facility: habitat destruction; and disturbance.
 - Multiple records of Burchell's Courser *Cursorius rufus* in pairs on site. The species is classified as Vulnerable regionally and Least Concern globally (Taylor *et al* 2015; IUCN, 2022). This species moves around in response to feeding conditions. The proposed project is unlikely to place them at much risk. It is likely to be susceptible to two possible impacts associated with a solar photovoltaic facility: habitat destruction; and disturbance.

Table 1. Summary of Species of Conservation Concern.

Full Name	Scientific Name	Red List (Regional, Global), Endemic	Specialist recorded on site	Likelihood of occurring on site	Relative importance of site for species	Potential impacts of project
Ludwig's Bustard	<i>Neotis ludwigii</i>	EN, EN	√	Confirmed	Medium	Habitat destruction, disturbance
Karoo Korhaan	<i>Eupodotis vigorsii</i>	NT, LC	√	Confirmed	Medium	Habitat destruction, disturbance
Abdim's Stork	<i>Ciconia abdimii</i>	NT, LC		Possible	Low	Habitat destruction, disturbance
Verreaux's Eagle	<i>Aquila verreauxii</i>	VU, LC		Highly likely	High – breeding nearby	Habitat destruction, disturbance
Lanner Falcon	<i>Falco biarmicus</i>	VU, LC		Highly likely	High – breeding	Habitat destruction, disturbance
Burchell's Courser	<i>Cursorius rufus</i>	VU, LC	√	Confirmed	Medium	Habitat destruction, disturbance



We dispute the Screening Tool finding for the Avian Theme which designates the site as Low sensitivity, and the Tool's assessment of a High sensitivity in the Animal Species Theme (for Ludwig's Bustard). We rather classify the site as Low-Medium sensitivity for avifauna. For the SCC identified by the screening tool specifically, the Ludwig's Bustard, the site is of Low sensitivity.

Compliance with protocols

In cases where no specific assessment protocol has been prescribed for a specialist assessment, the Government gazetted "*Site sensitivity verification requirements where a specialist assessment is required but no specific assessment protocol has been prescribed*" applies (GN 320, Gazette 43110). The requirements are as follows:

1. 1.1. *The Site Sensitivity Verification must be undertaken by an Environmental Assessment Practitioner or a specialist.*

In this case an avifaunal specialist (Jon Smallie – SACNASP 400020/06) has undertaken the SSV.

2. 1.2. *The site sensitivity verification must be undertaken through the use of:*
 - a. *A desk top analysis, using satellite imagery*
 - b. *A preliminary on site inspection, and*
 - c. *Any other available and relevant information*

This has been achieved as described above.

3. *The outcome of the site sensitivity verification must be recorded in the form of a report that*
 - a. *Confirms or disputes the current use of the land and the environmental sensitivity as identified by the screening tool, such as new developments or infrastructure, the change in vegetation cover of status etc*
 - b. *Contains a motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity, and*
 - c. *Is submitted together with the relevant assessment report prepared in accordance with the requirements of the Environmental Impact Assessment Regulations (EIA Regulations)*

This has been achieved as described above.



Conclusions & recommendations

Based on our work on site in 2021-2022, and desktop work we can confirm that the impacts in the original EIA have not changed. Our recommendations in the 2022 monitoring report and the mitigation and management measures included in the EMPr remain relevant and sufficient. We recommend that the amendment be authorised.



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

DETAILS OF THE SPECIALIST, DECLARATION OF INTEREST AND UNDERTAKING UNDER OATH

File Reference Number:
NEAS Reference Number:
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(For official use only)

DEA/EIA/

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PROJECT TITLE

Mulilo Struisbult PV2

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Email: EIAAdmin@environment.gov.za

1. SPECIALIST INFORMATION

Specialist Company Name:	WILDSKIES ECOLOGICAL SERVICES PTY LTD			
B-BBEE	Contribution level (indicate 1 to 8 or non-compliant)	4	Percentage Procurement recognition	100
Specialist name:	JON SMALLIE			
Specialist Qualifications:	BSC MSC			
Professional affiliation/registration:	SACNASP 400020/07			
Physical address:	36 UTRECHT AVENUE EAST LONDON			
Postal address:				
Postal code:	5241	Cell:	0824448919	
Telephone:		Fax:		
E-mail:	JON@WILDSKIES.CO.ZA			

2. DECLARATION BY THE SPECIALIST

I, J SMALLIE, declare that –

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
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- all the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.



Signature of the Specialist

WILDSKIES ECOLOGICAL SERVICES PTY LTD

Name of Company:

24 NOVEMBER 2022

Date

Details of Specialist, Declaration and Undertaking Under Oath

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, J. SMALLIE, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.



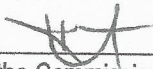
Signature of the Specialist

WINDSKIES ECOLOGICAL SERVICES

Name of Company

24/11/22

Date



Signature of the Commissioner of Oaths

24/11/2022

Date



KIM SMALLIE
Commissioner of Oaths
HR Professional (HRP)
Member number: 6404
3 Pearce Street
Berea, East London
5201



ENVIRONMENTAL PLANNING AND DESIGN CC

11th October 2022

To whom it may concern

STRUISBULT PV2 (DEA REF 12/12/20/2009) – LANDSCAPE AND VISUAL IMPACT

1 BACKGROUND

It is understood that the Environmental Authorisation for the above mentioned project has expired. The Applicant wants to proceed with the project but needs to undertake a fresh application for authorization.

Environmental Planning and Design have been asked to undertake a desktop exercise to review the Visual Impact Assessment (VIA) that formed part of the original application and to compare the current site context with the situation when the original application was undertaken.

The Level 3 VIA dated January 2012 undertaken by Landscape Architect, Karen Hansen was provided for the exercise. This document was included in the application for authorization.

2 FINDINGS

The VIA fulfills the Level 3 requirements of the ***Western Cape Guideline for involving visual and aesthetic specialists in EIA processes*** (Western Cape Guideline).

The Western Cape Guideline is the only relevant South African Guideline.

From the landscape description and aerial mapping included in the VIA and from reference to current aerial photography available through Google Earth, we conclude the following:

- The settlement footprint does not appear to have changed since the preparation of the VIA;
- Several solar PV projects have been developed in the vicinity of the project site since the preparation of the VIA.
- It also appears that there are airstrips in the area that could be affected by glare from solar PV panels.

3 BACKGROUND OF SPECIALIST

The reviewer, Jon Marshall, qualified as a Landscape Architect in 1978. He is a Chartered Member of the Landscape Institute (UK) and is a Registered Professional Landscape Architect within South Africa.

He has also had extensive experience working as an Environmental Assessment Practitioner (EAP) in South Africa. He has been involved in Visual Impact

Assessment over a period of approximately 40 years. He has developed the necessary computer skills to prepare viewshed analysis and three dimensional modelling to illustrate impact assessments. He has undertaken visual impact assessments for major buildings, industrial development, renewable energy, mining and infrastructure projects and has been involved in the preparation of visual guidelines for large scale developments.

A brief Curriculum Vitae outlining relevant projects attached.

Should there be any queries please contact the undersigned.

Yours faithfully

A handwritten signature in black ink, appearing to read 'J. Marshall'.

Jon Marshall
ENVIRONMENTAL PLANNING AND DESIGN

APPENDIX I
GUIDELINES FOR INVOLVING VISUAL AND AESTHETIC SPECIALISTS
IN EIA PROCESSES

(Preface, Summary and Contents for full document go to the Provincial Government of the Western Cape, Department of Environmental Affairs and Development Planning web site, <http://eadp.westerncape.gov.za/your-resource-library/policies-guidelines>)

GUIDELINE FOR INVOLVING VISUAL AND AESTHETIC SPECIALISTS IN EIA PROCESSES



PROVINCIAL GOVERNMENT OF THE WESTERN CAPE:
DEPARTMENT OF ENVIRONMENTAL AFFAIRS
AND DEVELOPMENT PLANNING



GUIDELINE FOR INVOLVING VISUAL AND AESTHETIC SPECIALISTS IN EIA PROCESSES

Edition 1

Issued by:

Provincial Government of the Western Cape
Department of Environmental Affairs and Development Planning
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This guideline should be cited as:

Oberholzer, B. 2005. *Guideline for involving visual & aesthetic specialists in EIA processes: Edition 1*. CSIR Report No ENV-S-C 2005 053 F. Republic of South Africa, Provincial Government of the Western Cape, Department of Environmental Affairs & Development Planning, Cape Town.

ACKNOWLEDGEMENTS

Steering committee:

Paul Hardcastle	-	DEA&DP
Ayub Mohammed	-	DEA&DP
Susie Brownlie	-	de Villiers Brownlie Associates
Keith Wiseman	-	City of Cape Town
Mike Burns	-	CSIR Environmentek
Paul Lochner	-	CSIR Environmentek
Pete Ashton	-	CSIR Environmentek

Focus group participants:

Paul Hardcastle	-	DEA&DP
Washiela Anthony	-	DEA&DP
Danie Smit	-	DEAT
Eileen Weinronk	-	City of Cape Town
Menno Klapwijk	-	Cave Klapwijk and Associates
Graham Young	-	Landscape Consultant
Bernard Oberholzer	-	Bernard Oberholzer Landscape Architect (BOLA)
Nicolas Baumann	-	Baumann & Winter Heritage Consultants
Sarah Winter	-	Baumann & Winter Heritage Consultants
Tanya de Villiers	-	Chittenden Nicks deVilliers Africa
Frauke Münster	-	CSIR Environmentek

Internal review:

Mike Burns	-	CSIR Environmentek
Eileen Weinronk	-	City of Cape Town
Paul Hardcastle	-	DEA&DP
Washiela Anthony	-	DEA&DP

Stakeholders engaged in the guideline development process:

These guidelines were developed through a consultative process and have benefited from the inputs and comments provided by a wide range of individuals and organizations actively working to improve EIA practice. Thanks are due to all who took the time to engage in the guideline development process.

In particular, thanks are due to Jan Glazewski (University of Cape Town), Keith Wiseman (City of Cape Town), Paul Britton (SANPARKS), Graham Young (University of Pretoria), Lisa Parkes (Ninham Shand) and Paul Claassen (Environomics) for providing useful information and in-depth comments.

Finalisation of report figures and formatting:

Magdel van der Merwe and Elna Logie, DTP Solutions

PREFACE

The purpose of an Environmental Impact Assessment (EIA) is to provide decision-makers (be they government authorities, the project proponent or financial institutions) with adequate and appropriate information about the potential positive and negative impacts of a proposed development and associated management actions in order to make an informed decision whether or not to approve, proceed with or finance the development.

For EIA processes to retain their role and usefulness in supporting decision-making, the involvement of specialists in EIA needs to be improved in order to:

- Add greater value to project planning and design;
- Adequately evaluate reasonable alternatives;
- Accurately predict and assess potential project benefits and negative impacts;
- Provide practical recommendations for avoiding or adequately managing negative impacts and enhancing benefits;
- Supply enough relevant information at the most appropriate stage of the EIA process to address adequately the key issues and concerns, and effectively inform decision-making in support of sustainable development.

It is important to note that not all EIA processes require specialist input; broadly speaking, specialist involvement is needed when the environment could be significantly affected by the proposed activity, where that environment is valued by or important to society, and/or where there is insufficient information to determine whether or not unavoidable impacts would be significant.

The purpose of this series of guidelines is to improve the efficiency, effectiveness and quality of specialist involvement in EIA processes. The guidelines aim to improve the capacity of roleplayers to anticipate, request, plan, review and discuss specialist involvement in EIA processes. Specifically, they aim to improve the capacity of EIA practitioners to draft appropriate terms of reference for specialist input and assist all roleplayers in evaluating whether or not specialist input to the EIA process is appropriate for the type of development and environmental context. Furthermore, they aim to ensure that specialist inputs support the development of effective, practical Environmental Management Plans where projects are authorised to proceed (refer to *Guideline for Environmental Management Plans*).

The guidelines draw on best practice in EIA in general, and within specialist fields of expertise in particular, to address the following issues related to the timing, scope and quality of specialist input. The terms “specialist involvement” and “input” have been used in preference to “specialist assessment” and “studies” to indicate that the scope of specialists’ contribution (if required) depends on the nature of the project, the environmental context and the amount of available information and does not always entail detailed studies or assessment of impacts.

The guidelines draw on best practice in EIA in general, and within specialist fields of expertise in particular, to address the following issues related to the timing, scope and quality of specialist input. The terms “specialist involvement” and “input” have been used in preference to “specialist

assessment” and “studies” to indicate that the scope of specialists’ contribution depends on the nature of the project, the environmental context and the amount of available information.

	ISSUES
TIMING	<ul style="list-style-type: none"> ▪ When should specialists be involved in the EIA process; i.e. at what stage in the EIA process should specialists be involved (if at all) and what triggers the need for their input?
SCOPE	<ul style="list-style-type: none"> ▪ Which aspects must be addressed through specialist involvement; i.e. what is the purpose and scope of specialist involvement? ▪ What are appropriate approaches that specialists can employ? ▪ What qualifications, skills and experience are required?
QUALITY	<ul style="list-style-type: none"> ▪ What triggers the review of specialist studies by different roleplayers? ▪ What are the review criteria against which specialist inputs can be evaluated to ensure that they meet minimum requirements, are reasonable, objective and professionally sound?

The following guidelines form part of this first series of guidelines for involving specialists in EIA processes:

- Guideline for determining the scope of specialist involvement in EIA processes
- Guideline for the review of specialist input in EIA processes
- Guideline for involving biodiversity specialists in EIA processes
- Guideline for involving hydrogeologists in EIA processes
- Guideline for involving visual and aesthetic specialists in EIA processes
- Guideline for involving heritage specialists in EIA processes
- Guideline for involving economists in EIA processes

The *Guideline for determining the scope of specialist involvement in EIA processes* and the *Guideline for the review of specialist input in EIA processes* provide generic guidance applicable to any specialist input to the EIA process and clarify the roles and responsibilities of the different roleplayers involved in the scoping and review of specialist input. It is recommended that these two guidelines are read first to introduce the generic concepts underpinning the guidelines which are focused on specific specialist disciplines.

Who is the target audience for these guidelines?

The guidelines are directed at authorities, EIA practitioners, specialists, proponents, financial institutions and other interested and affected parties involved in EIA processes. Although the guidelines have been developed with specific reference to the Western Cape province of South Africa, their core elements are more widely applicable.

What type of environmental assessment processes and developments are these guidelines applicable to?

The guidelines have been developed to support project-level EIA processes regardless of whether they are used during the early project planning phase to inform planning and design decisions (i.e. during pre-application planning) or as part of a legally defined EIA process to obtain statutory approval for a proposed project (i.e. during screening, scoping and/or impact assessment). Where specialist input may be required the guidelines promote early, focused and appropriate involvement of specialists in EIA processes in order to encourage proactive consideration of potentially significant impacts, so that negative impacts may be avoided or

effectively managed and benefits enhanced through due consideration of alternatives and changes to the project.

The guidelines aim to be applicable to a range of types and scales of development, as well as different biophysical, social, economic and governance contexts.

What will these guidelines not do?

In order to retain their relevance in the context of changing legislation, the guidelines promote the principles of EIA best practice without being tied to specific legislated national or provincial EIA terms and requirements. They therefore do not clarify the specific administrative, procedural or reporting requirements and timeframes for applications to obtain statutory approval. They should, therefore, be read in conjunction with the applicable legislation, regulations and procedural guidelines to ensure that mandatory requirements are met.

It is widely recognized that no amount of theoretical information on how best to plan and coordinate specialist inputs, or to provide or review specialist input, can replace the value of practical experience of coordinating, being responsible for and/or reviewing specialist inputs. Only such experience can develop sound judgment on such issues as the level of detail needed or expected from specialists to inform decision-makers adequately. For this reason, the guidelines should not be viewed as prescriptive and inflexible documents. Their intention is to provide best practice guidance to improve the quality of specialist input.

Furthermore, the guidelines do not intend to create experts out of non-specialists. Although the guidelines outline broad approaches that are available to the specialist discipline (e.g. field survey, desktop review, consultation, modeling), specific methods (e.g. the type of model or sampling technique to be used) cannot be prescribed. The guidelines should therefore not be used indiscriminately without due consideration of the particular context and circumstances within which an EIA is undertaken, as this influences both the approach and the methods available and used by specialists.

How are these guidelines structured?

The specialist guidelines have been structured to make them user-friendly. They are divided into six parts, as follows:

- **Part A:** Background;
- **Part B:** Triggers and key issues potentially requiring specialist input;
- **Part C:** Planning and coordination of specialist inputs (drawing up terms of reference);
- **Part D:** Providing specialist input;
- **Part E:** Review of specialist input; and
- **Part F:** References.

Part A provides grounding in the specialist subject matter for all users. It is expected that authorities and peer reviewers will make most use of Parts B and E; EIA practitioners and project proponents Parts B, C and E; specialists Part C and D; and other stakeholders Parts B, D and E. Part F gives useful sources of information for those who wish to explore the specialist topic.

SUMMARY

This guideline document, which deals with specialist visual input into the EIA process, is organised into a sequence of interleaving sections. These follow a logical order covering the following:

- the background and context for specialist visual input;
- the triggers and issues that determine the need for visual input;
- the type of skills and scope of visual inputs required in the EIA process;
- the methodology, along with information and steps required for visual input;
- finally, the review or evaluation of the visual assessment process.

Part A is concerned with defining the visual and aesthetic component of the environment, and with principles and concepts relating to the visual assessment process. The importance of the process being logical, holistic, transparent and consistent is stressed in order for the input to be useful and credible.

The legal and planning context within which visual assessments take place indicate that there are already a number of laws and bylaws that protect visual and scenic resources. These resources within the Western Cape context have importance for the economy of the region, along with the proclaimed World Heritage Sites in the Province.

The role and timing of specialist visual inputs into the EIA process are outlined, with the emphasis being on timely, and on appropriate level of input, from the early planning stage of a project, through to detailed mitigation measures and

management controls at the implementation stage.

Part B deals with typical factors that trigger the need for specialist visual input to a particular project. These factors typically relate to:

- (a) the nature of the receiving environment, in particular its visual sensitivity or protection status;
- (b) the nature of the project, in particular the scale or intensity of the project, which would result in change to the landscape or townscape.

The correlation between these two aspects are shown in a table, in order to determine the varying levels of visual impact that can be expected, i.e. from little or no impact, to very high visual impact potential.

Part C deals with the choice of an appropriate visual specialist, and the preparation of the terms of reference (TOR) for the visual input. Three types of visual assessment are put forward, each requiring different expertise, namely:

- Type A: assessments involving large areas of natural or rural landscape;
- Type B: assessments involving local areas of mainly built environment;
- Type C: assessments involving smaller scale sites with buildings, or groups of buildings.

The scope of the visual input would in summary relate to the following:

- the issues raised during the scoping process;
- the time and space boundaries, i.e. the extent or zone of visual influence;

- the types of development alternatives that are to be considered;
- the variables and scenarios that could affect the visual assessment;
- the inclusion of direct, indirect and cumulative effects.

Approaches to the visual input relate to the level of potential impact and range from minimal specialist input, to a full visual impact assessment (VIA). A list of the typical components of a visual assessment is given, and the integration with other studies forming part of the EIA process is discussed.

Part D provides guidance for specialist visual input, and on the information required by specialists. Notes on predicting potential visual impacts are given, along with suggested criteria for describing and rating visual impacts. The assessment of the overall significance of impacts, as well as thresholds of significance are discussed.

Further aspects that need to be considered by visual specialists in EIA processes include:

- affected parties who stand to benefit or lose,
- risks and uncertainties related to the project,
- assumptions that have been made, and their justification,
- levels of confidence in providing the visual input or assessment,
- management actions that can be employed to avoid or mitigate adverse effects and enhance benefits, and
- the best practicable environmental option from the perspective of the visual issues and impacts.

Finally, pointers for the effective communication of the findings are given.

Part E lists specific evaluation criteria for reviewing visual input by a specialist, where this becomes necessary. Further guidance on this is given in the document on *Guideline for the review of specialist input in EIA processes*.

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APPENDIX II
SPECIALIST'S BRIEF CV



ENVIRONMENTAL PLANNING AND DESIGN

Name	JONATHAN MARSHALL															
Nationality	British															
Year of Birth	1956															
Specialisation	Landscape Architecture / Landscape & Visual Impact Assessment / Environmental Planning / Environmental Impact Assessment.															
Qualifications																
<u>Education</u>	Diploma in Landscape Architecture, Gloucestershire College of Art and Design, UK (1979) Environmental Law, University of KZN (1997)															
<u>Professional</u>	Registered Professional Landscape Architect (SACLAP) Chartered Member of the Landscape Institute (UK) Member of the International Association of Impact Assessment, South Africa															
Languages	<table><tr><td><u>English</u></td><td>-</td><td>Speaking</td><td>-</td><td>Excellent</td></tr><tr><td></td><td>-</td><td>Reading</td><td>-</td><td>Excellent</td></tr><tr><td></td><td>-</td><td>Writing</td><td>-</td><td>Excellent</td></tr></table>	<u>English</u>	-	Speaking	-	Excellent		-	Reading	-	Excellent		-	Writing	-	Excellent
<u>English</u>	-	Speaking	-	Excellent												
	-	Reading	-	Excellent												
	-	Writing	-	Excellent												
Contact Details	Post: 13 Askew Grove Glenwood Durban 4001 Cell: +27 83 7032995															

General

Jon qualified as a Landscape Architect (Dip LA) at Cheltenham (UK) in 1979. He has been a chartered member of the Landscape Institute UK since 1986. He is also a Registered Landscape Architect and has had extensive experience as an Environmental Assessment Practitioner within South Africa.

During the early part of his career (1981 - 1990) He worked with Clouston (now RPS) in Hong Kong and Australia. During this period he was called on to undertake Landscape and Visual Impact assessment (LVIA) input to numerous environmental assessment processes for major infrastructure projects. This work was generally based on photography with line drawing superimposed to illustrate the extent of development visible.

He has worked in the United Kingdom (1990 - 1995) for major supermarket chains including Sainsbury's and prepared CAD based visual impact assessments for public enquiries for new store development. He also prepared the LVIA input to the environmental statement for the Cardiff Bay Barrage for consideration by the UK Parliament in the passing of the Barrage Act (1993).

His more recent LVIA work (1995 to present) includes a combination of CAD and GIS based work for a new international airport to the north of Durban, new heavy industrial operations, overhead electrical transmission lines, mining operations in West Africa and numerous commercial and residential developments.

LVIA work undertaken during the last twelve months includes wind energy projects, numerous solar plant projects (CSP and PV) and electrical infrastructure.

Select List of Visual Impact Assessment Projects

- **Geelkop Solar PV projects** – Landscape and Visual Impact Assessment for seven proposed solar PV projects near Upington in the Northern Cape Province for Atlantic Renewable Energy Partners.
- **Makapanstad Agri- Hub** – Landscape and Visual Impact Assessment for proposed Agri-Hub development at Makapanstad in the North West Province for the Department of Rural Development and Land Reform.
- **Madikwe Sky Bubble** - Landscape and Visual Impact Assessment for proposed development of up-market accommodation at the Molori concession within the Madikwe Game Reserve.
- **Hartebeest Wind Energy Facility** – Landscape and Visual Impact Assessment Addendum Report for the proposed upgrading of turbine specifications for an authorised WEF near Mo0rreesburg in the Western Cape Province for a private client.
- **Selati Railway Bridge** - Landscape and Visual Impact Assessment for proposed development of up-market accommodation on a railway bridge at Skukuza in the Kruger Park.
- **Kangala Mine Extension** - Landscape and Visual Impact Assessment for a proposed extension to the Kangala Mine in Mpumalanga for Universal Coal.
- **Khunab Solar Developments** – Landscape and Visual Impact Assessment for four proposed solar PV projects near Upington in the Northern Cape Province for a private client.
- **Sirius Solar Developments** – Landscape and Visual Impact Assessment for four proposed solar PV projects near Upington in the Northern Cape Province for Sola Future Energy.
- **Aggeneys Solar Developments** – Landscape and Visual Impact Assessment for two proposed solar PV projects near Aggeneys in the Northern Cape Province for a private client.
- **Hyperion Solar Developments** – Landscape and Visual Impact Assessment for four proposed solar PV projects near Kathu in the Northern Cape Province for Building Energy South Africa.
- **Eskom Combined Cycle Power Plant** - Landscape and Visual Impact Assessment for proposed gas power plant in Richards Bay, KwaZulu Natal Province.
- **N2 Wild Coast Toll Road, Mineral Sources and Auxiliary Roads** – VIA for the Pondoland Section of this project for the South African National Roads Agency.
- **Mpushini Park Ashburton** – VIA for a proposed amendment to an authorised development plan which included residential, office park and light industrial uses to logistics and warehousing.
- **Moedeng PV Solar Project** - VIA for a solar project near Vrybury in the North West Province for a private client.
- **Establishment of Upmarket Tourism Accommodation on the Selati Bridge, Kruger National Park** – Assessment of visual implications of providing tourism accommodation in 12 railway carriages on an existing railway bridge at the Skukuza Rest Camp in the Kruger Park.
- **Jozini TX Transmission Tower** – Assessment of visual implications of a proposed MTN transmission tower on the Lebombo ridgeline overlooking the Pongolapoort Nature reserve and dam.
- **Bhangazi Lake Development** – Visual Impact Assessment for a proposed tourism development within the iSimangaliso Wetland Park World Heritage Site.
- **Palesa Power Station** - VIA for a new 600MW power station near Kwamhlanga in Mpumalanga for a private client.

- **Heuningklip PV Solar Project** – VIA for a solar project in the Western Cape Province for a private client.
- **Kruispad PV Solar Project** – VIA for a solar project in the Western Cape Province for a private client.
- **Doornfontein PV Solar Project** – VIA for a solar project in the Western Cape Province for a private client.
- **Olifantshoek Power Line and Substation** – VIA for a new 10MVA 132/11kV substation and 31km powerline, Northern Cape Province, for Eskom.
- **Noupoort Concentrating Solar Plants** - Scoping and Visual Impact Assessments for two proposed parabolic trough projects.
- **Drakensberg Cable Car** – Preliminary Visual Impact Assessment and draft terms of reference as part of the feasibility study.
- **Paulputs Concentrating Solar Plant (tower technology)** – Visual Impact Assessment for a new CSP project near Pofadder in the Northern Cape.
- **Ilanga Concentrating Solar Plants 1, 2, 3, 4 & 5** – Scoping and Visual Impact Assessments for the proposed extension of five authorised CSP projects including parabolic trough and tower technology within the Karoshoek Solar Valley near Upington in the Northern Cape.
- **Ilanga Concentrating Solar Plants 1, 2, 3, 4 & 5 Shared Infrastructure** – Visual Impact Assessment for the necessary shared infrastructure including power lines, substation, water pipeline and roads for these projects.
- **Ilanga Concentrating Solar Plants 7, 8 & 9** - Scoping and Visual Impact Assessments for three new CSP projects including parabolic trough and tower technology within the Karoshoek Solar Valley near Upington in the Northern Cape.
- **Sol Invictus Solar Plants** - Scoping and Visual Impact Assessments for three new Solar PV projects near Pofadder in the Northern Cape.
- **Gunstfontein Wind Energy Facility** – Scoping and Visual Impact Assessment for a proposed WEF near Sutherland in the Northern Cape.
- **Moorreesburg Wind Energy Facility** – Visual Impact Assessment for a proposed WEF near Moorreesburg in the Western Cape.
- **Semonkong Wind Energy Facility** - Visual Impact Assessment for a proposed WEF near Semonkong in Southern Lesotho.
- **Great Karoo Wind Energy Facility** – Addendum report to the Visual Impact Assessment Report for amendment to this authorised WEF that is located near Sutherland in the Northern Cape. Proposed amendments included layout as well as rotor diameter.
- **Perdekraal East Power Line** – Visual Impact Assessment for a proposed power line to evacuate power from a wind energy facility near Sutherland in the Northern Cape.
- **Tshivhaso Power Station** – Scoping and Visual Impact Assessment for a proposed new power station near Lephalale in Limpopo Province.
- **Saldanha Eskom Strengthening** – Scoping and Visual Impact Assessment for the upgrading of strategic Eskom infrastructure near Saldanha in the Western Cape.
- **Eskom Lethabo PV Installation** - Scoping and Visual Impact Assessment for the development of a solar PV plant within Eskom's Lethabo Power Station in the Free State.
- **Eskom Tuthuka PV Installation** - Scoping and Visual Impact Assessment for the development of a solar PV plant within Eskom's Thutuka Power Station in Mpumalanga.
- **Eskom Majuba PV Installation** - Scoping and Visual Impact Assessment for the development of a solar PV plant within Eskom's Majuba Power Station in Mpumalanga.
- **Golden Valley Power Line** - Visual Impact Assessment for a proposed power line to evacuate power from a wind energy facility near Cookhouse in the Eastern Cape.

- **Mpophomeni Shopping Centre** – Visual impact assessment for a proposed new shopping centre close to the southern shore of Midmar Dam in KwaZulu Natal.
- **Rheebokfontein Power Line** - Addendum report to the Visual Impact Assessment Report for amendment to this authorised power line alignment located near Darling in the Western Cape.
- **Woodhouse Solar Plants** – Scoping and Visual Impact Assessment for two proposed solar PV projects near Vryburg in the North West Province.
- **AngloGold Ashanti, Dokyiwa (Ghana)** – Visual Impact Assessment for proposed new Tailings Storage Facility at a mine site working with SGS as part of their EIA team.
- **Gateway Shopping Centre Extension (Durban)** – Visual Impact Assessment for a proposed shopping centre extension in Umhlanga, Durban.
- **Kouroussa Gold Mine (Guinea)** – Visual impact assessment for a proposed new mine in Guinea working with SGS as part of their EIA team.
- **Mampon Gold Mine (Ghana)** - Visual impact assessment for a proposed new mine in Ghana working with SGS as part of their EIA team.
- **Telkom Towers** – Visual impact assessments for numerous Telkom masts in KwaZulu Natal.
- **Eskom Isundu Substation** – Visual Impact Assessment for a proposed major new Eskom substation near Pietermaritzburg in KwaZulu Natal.
- **Eskom St Faiths Power Line and Substation** – Visual Impact Assessment for a major new substation and associated power lines near Port Shepstone in KwaZulu Natal.
- **Eskom Ficksburg Power Line** – Visual Impact Assessment for a proposed new power line between Ficksburg and Cocolan in the Free State.
- **Eskom Matubatuba to St Lucia Power Line** – Visual Impact Assessment for a proposed new power line between Mtubatuba and St Lucia in KwaZulu Natal.
- **Dube Trade Port, Durban International Airport** – Visual Impact Assessment
- **Sibaya Precinct Plan** – Visual Impact Assessment as part of Environmental Impact Assessment for a major new development area to the north of Durban.
- **Umdloti Housing** – Visual Impact Assessment as part of Environmental Impact Assessment for a residential development beside the Umdloti Lagoon to the north of Durban.
- **Tata Steel Ferrochrome Smelter** - Visual impact assessment of proposed new Ferrochrome Smelter in Richards Bay as part of EIA undertaken by the CSIR.
- **Durban Solid Waste Large Landfill Sites** – Visual Impact Assessment of proposed development sites to the North and South of the Durban Metropolitan Area. The project utilised 3d computer visualisation techniques.
- **Hillside Aluminium Smelter, Richards Bay** - Visual Impact Assessment of proposed extension of the existing smelter. The project utilised 3d computer visualisation techniques.
- **Estuaries of KwaZulu Natal Phase 1** – Visual character assessment and GIS mapping as part of a review of the condition and development capacity of eight estuary landscapes for the Town and Regional Planning Commission. The project was extended to include all estuaries in KwaZulu Natal.
- **Signage Assessments** – Numerous impact assessments for proposed signage developments for Blast Media.
- **Signage Strategy** – Preparation of an environmental strategy report for a national advertising campaign on National Roads for Visual Image Placements.
- **Zeekoegatt, Durban** - Computer aided visual impact assessment. EDP acted as advisor to the Province of KwaZulu Natal in an appeal brought about by a developer to extend a light industrial development within a 60 metre building line from the National N3 Highway.

- **La Lucia Mall Extension** - Visual impact assessment using three dimensional computer modelling / photo realistic rendering and montage techniques for proposed extension to shopping mall for public consultation exercise.
- **Redhill Industrial Development** - Visual impact assessment using three dimensional computer modelling / photo realistic rendering and montage techniques for proposed new industrial area for public consultation exercise.
- **Avondale Reservoir** - Visual impact assessment using three dimensional computer modelling / photo realistic rendering and montage techniques for proposed hilltop reservoir as part of Environmental Impact Assessment for Umgeni Water.
- **Hammersdale Reservoir** - Visual impact assessment using three dimensional computer modelling / photo realistic rendering and montage techniques for proposed hilltop reservoir as part of Environmental Impact Assessment for Umgeni Water.
- **Southgate Industrial Park, Durban** - Computer Aided Visual Impact Assessment and Landscape Design for AECL.
- **Sainsbury's Bryn Rhos** - Computer Aided Visual Impact Assessment/ Planning Application for the development of a new store within the Green Wedge North of Swansea.
- **Ynyston Farm Access** - Computer Aided Impact Assessment of visual intrusion of access road to proposed development of Cardiff for the Land Authority for Wales.
- **Cardiff Bay Barrage** – Preparation of the Visual Impact Statement for inclusion in the Impact Statement for debate by parliament (UK) prior to the passing of the Cardiff Bay Barrage Bill.
- **A470, Cefn Coed to Pentrebach** - Preparation of landscape frameworks for the assessment of the impact of the proposed alignment on the landscape for The Welsh Office.
- **Sparkford to Ilchester Bye Pass** - The preparation of the landscape framework and the draft landscape plan for the Department of Transport.
- **Green Island Reclamation Study** - Visual Impact Assessment of building massing, Urban Design Guidelines and Masterplanning for a New Town extension to Hong Kong Island.
- **Route 3** - Visual Impact Assessment for alternative road alignments between Hong Kong Island and the Chinese Border.
- **China Border Link** - Visual Impact Assessment and initial Landscape Design for a new border crossing at Lok Ma Chau.
- **Route 81, Aberdeen Tunnel to Stanley** - Visual Impact Assessment for alternative highway alignments on the South side of Hong Kong Island.



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

DETAILS OF THE SPECIALIST, DECLARATION OF INTEREST AND UNDERTAKING UNDER OATH

File Reference Number:
NEAS Reference Number:
Date Received:

(For official use only)
DEA/EIA/

Application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

PROJECT TITLE

Mulilo Struisbult PV2

Kindly note the following:

1. This form must always be used for applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting where this Department is the Competent Authority.
2. This form is current as of 01 September 2018. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at <https://www.environment.gov.za/documents/forms>.
3. A copy of this form containing original signatures must be appended to all Draft and Final Reports submitted to the department for consideration.
4. All documentation delivered to the physical address contained in this form must be delivered during the official Departmental Officer Hours which is visible on the Departmental gate.
5. All EIA related documents (includes application forms, reports or any EIA related submissions) that are faxed; emailed; delivered to Security or placed in the Departmental Tender Box will not be accepted, only hardcopy submissions are accepted.

Departmental Details

Postal address:

Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Private Bag X447
Pretoria
0001

Physical address:

Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Environment House
473 Steve Biko Road
Arcadia

Queries must be directed to the Directorate: Coordination, Strategic Planning and Support at:
Email: EIAAdmin@environment.gov.za

1. SPECIALIST INFORMATION

Specialist Company Name:	Environmental Planning and Design		
B-BBEE	Contribution level (indicate 1 to 8 or non-compliant)	4	Percentage Procurement recognition
Specialist name:	Jonathan Marshall		
Specialist Qualifications:	Dip.LA.		
Professional affiliation/registration:	Chartered Member of the Landscape Institute (UK). Registered Professional Landscape Architect (South Africa). IAIA		
Physical address:	72 Carlton Avenue, Westville, 3629		
Postal address:	PO Box 50910, Musgrave Road		
Postal code:	4062	Cell:	083 703 2995
Telephone:		Fax:	
E-mail:	jon@enviroconsult.co.za		

2. DECLARATION BY THE SPECIALIST

I, Jonathan Marshall, declare that –

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- all the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.



Signature of the Specialist

Environmental Planning and Design

Name of Company:

14^h May 2021

Date

Details of Specialist, Declaration and Undertaking Under Oath

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, Jonathan Marshall, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.

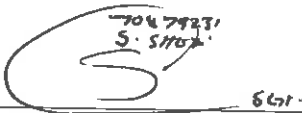


Signature of the Specialist

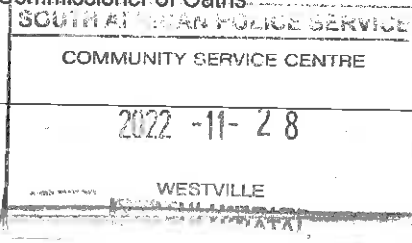
Environmental Planning and Design
Name of Company

14th May 2021

Date



Signature of the Commissioner of Oaths



Date