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Att: **The Directors**

Cape EAPrac (Pty) Ltd

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Att: **Dale Holder**

15 May 2020

RE: Amendment Application for the Hotazel Solar Facility

ABO Wind Hotazel PV (Pty) Ltd wishes to apply for an amendment to the authorised Hotazel Solar facility (EIA Ref No: 14/12/16/3/3/2/1086), located near Hotazel in the Northern Cape. The Environmental Authorisation (EA) Amendment Application proposes a change to the layout of the facility. Cape EAPrac has therefore requested a comparative assessment and comments from 3Foxes Biodiversity Solutions to assess the proposed changes in the context of the former Avifaunal Impact Assessment and to determine any impacts resulting from the proposed amendments. The motivation for and nature of the intended amendment include the following:

- Under the amended layout, the site access points and substation position do not differ from the original assessed and authorised layout.
- The two grid connection options remain the same with the inclusion of a third option. The third option includes a ± 1 km overhead 132kV powerline from the Hotazel Solar on-site substation/collector switching station to the Hotazel 2 collector switching station (which is being proposed in a separate EIA process). The powerline will have a maximum height of 32m and a servitude width of between 31m and 36m. The preferred option remains as per the original EIA (i.e. LILO into the existing Hotazel/Eldoret 132kV line).
- The footprint of the PV field has been changed as indicated in Figure 1 below. In terms of the amended layout the development footprint of the PV field has been moved further west within the

site so as to accommodate a second PV facility (which is being proposed in a separate EIA process) within the eastern half of the site.

- The total output and required components of the facility would remain approximately the same as those included in the original EIA. As such, the amendment amounts to a westward shift in the PV field of up to 1km from that originally assessed.

As the amendment will result in a change in the location of the footprint of the PV field, this may have different impacts from the original authorised layout, Cape EAPrac has requested confirmation regarding the assessed impacts in terms of the following:

1. Discussion on the change in significance and nature of assessed impacts or any new impacts on avifauna, if any;
2. Additional mitigation measures, if any;
3. Any disadvantages and advantages that may result due to the amendment;
4. Comment on the acceptability of the proposed amendment in terms of avifaunal impacts.



Figure 1. Map illustrating the original authorised and the new amended PV footprint areas.

1. Change in Impact or any New Impact Due to the Proposed Amended Layout

The approved and the proposed amended PV footprint areas in relation to the avifaunal sensitivity of the site, are illustrated below in Figure 2. The area into which the new PV field would expand is considered medium avifaunal sensitivity, which is the same as that within the authorised footprint. There is however an increase in the density of woody plant vegetation as one moves towards the western margin of the site. The proposed amended footprint would therefore include some of these areas. The differences in tree density are associated with concomitant shifts in the avifaunal community across the site. The original EIA study found that “Some species showed rather clear preferences for parts of the study area. Northern Black Korhaan *Afrotis afraoides* was found exclusively in the eastern half of the site, which is less dense with

fewer woody plant species and a more expansive grass layer. The Red-crested Korhaan *Lophotis ruficrista*, which prefers more closed woodland, showed the opposite trend, being detected only within the woodier western half of the site. Amongst the passerines, Desert Cisticola *Cisticola aridulus*, Fawn-coloured Lark *Calendulauda africanoides*, and White-browed Sparrow-weaver *Plocepasser mahali* also showed a distinct preference for the less woody eastern half of the site.” The implications of this are that there would be some change in the exact composition of the affected avifaunal community as a result of the amendment. However, overall this is seen as a neutral effect as there are no species of conservation concern that were observed to be associated with specific parts of the site.

The original study found that construction-phase impacts on avifauna would be Medium-Low after mitigation and that operational impacts would be Low after mitigation. The westward shift in the PV field would not have significant additional implications. Therefore, the above impacts will remain the same for the amended layout of the facility.

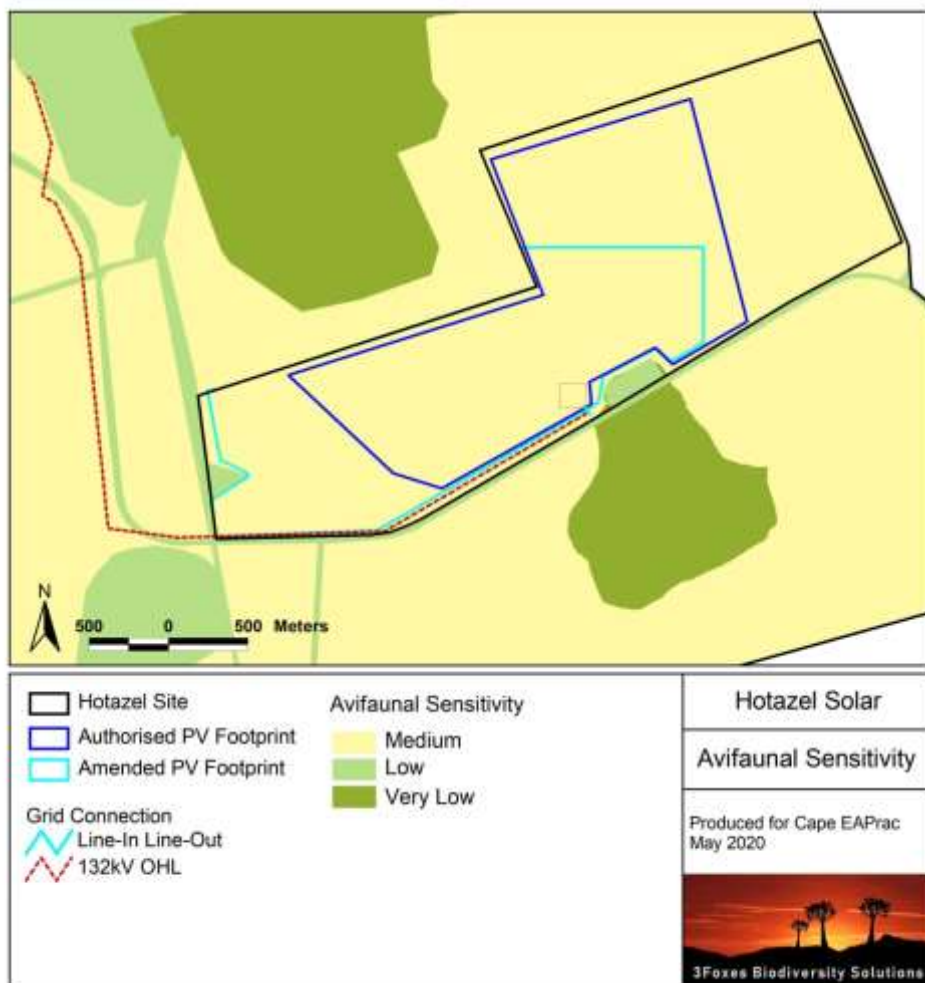


Figure 2. Avifaunal sensitivity map of the study area, showing the approved and the proposed amended footprint of the PV field.

2. Additional Mitigation Measures

No additional mitigation measures or changes to the EMP mitigation measures would be required in terms of this amendment, as no significant change to impacts or new impacts will occur. All the original avoidance and mitigation measures as indicated in the avifaunal study is still relevant and applicable to the amended layout and must be implemented.

3. Advantages and Disadvantages of the Proposed Amendment

The primary disadvantage of the shift in the Hotazel Solar PV footprint would be an increase in the number of trees within the development footprint and the potential implications that this would have on potential nesting sites for larger bird species. However, no nests of larger species were observed within the site during the EIA field studies, with the result that it is unlikely that this potential negative impact would actually be realised. The footprint would however shift closer to the railway, R31 and R380, which is potentially positive as a larger extent of the development footprint would be located close to existing corridors of noise and regular disturbance.

Conclusions and Summary Findings

- The area into which the amended PV footprint would expand is considered medium avifaunal sensitivity and represents habitat of similar sensitivity to that within the authorised footprint. There is however an increase in the density of woody plant vegetation as one moves towards the western margin of the site. The amended PV footprint would therefore impact a slightly different bird community from the original authorised PV footprint. This shift in affected bird community composition would however not increase the impacts associated with the development to any noticeable degree.
- The Hotazel Solar amendment is therefore supported in terms of avifaunal impacts. The impact of the amended layout on avifauna would be similar to the authorised layout and no changes to the assessed impacts are considered warranted.
- No additional mitigation or avoidance measures are recommended as a result of the amendment. The original mitigation and avoidance measures as included in the EIA should still be applied to the current study.

Prepared by Eric Herrmann & Simon Todd

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