



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA, 0001· Environment House, 473 Steve Biko Road, Arcadia· PRETORIA

DFFE Reference: 14/12/16/3/3/2/915/AM2

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Mr Dick Berlijn
Serurubele Solar Power Plant (Pty) Ltd
P.O Box 785553
SANDTON
2146

Telephone Number: 074 248 8488
Email Address: berlijn@subsolar.co.za

PER EMAIL / MAIL

Dear Mr Berlijn,

AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION ISSUED ON 29 NOVEMBER 2016 FOR THE SONBESIE PHOTOVOLTAIC (PV) SOLAR POWER PROJECT NEAR VRYBURG IN THE NORTH WEST PROVINCE

The Environmental Authorisation (EA) issued for the abovementioned application by this Department on 29 November 2016, the amendment to the EA dated 10 May 2017, your application for amendment of the EA received by the Department on 12 March 2021 and the acknowledgement letter dated 17 March 2021, refer.

Based on a review of the reason for requesting an amendment to the above EA, this Department, in terms of Chapter 5 of the Environmental Impact Assessment Regulations, 2014 as amended, has decided to partial amend the EA dated 29 November 2016 as amended, as follows:

Amendment 1: inclusion of a battery storage system (BESS)

This amendment is for the inclusion of a battery storage system (BESS) within the development footprint (which automatically changes in the initial submitted Layout Plan which was not approved. The area where the battery storage facility will be located will be up to 6hectares in extent within the initial development footprint boundaries.

New corner five (5) coordinates for the Sonbesie BESS are as follows:

- (a) 26°59'40.06"S; 24°41'35.33"E
- (b) 26°59'44.19"S; 24°41'37.82"E
- (c) 26°59'46.97"S; 24°41'36.80"E
- (d) 26°59'50.50"S; 24°41'28.58"E
- (e) 26°59'44.41"S; 24°41'25.16"E

Amendment 2: increasing capacity of 115MWdc to up to 150MWdc

This amendment is for the increase in capacity from 115MWdc to up to 150MWdc. This amendment will lead to a change in project description of the project, activity description for activity 1, technical details of the proposed facility, and some conditions of the EA dated 29 November 2016 (page 1, 3, 5 and 6) to reflect the new capacity of 150MW.

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Amendment 3: increasing the height of the panels

This amendment is for the increasing the height of the panels from 3.5 meters to 6 meters. The table summarising the technical details of the proposed facility on page 5 of the EA required to be amended to reflect the new 6 metres.

Amendment 4: increasing the number of inverters

This amendment is for the increasing the number of inverters due to the increase in MWdc capacity. More inverters are needed to convert the increased DC capacity to AC. The minimum inverters be amended from 34 to a minimum of 50.

The description and some conditions of EA dated 29 November 2016 are amended as follows:

a) Page 1: The title of the authorisation

From:

The construction of the 115 MW Sonbesie Photovoltaic Solar Energy Facility on the Remaining Extent of Farm Retreat No. 671, Registration Division IN, near Vryburg within the Naledi Local Municipality in the North West Province.

Amended to:

The construction of the 150 MW Sonbesie Photovoltaic Solar Energy Facility on the Remaining Extent of Farm Retreat No. 671, Registration Division IN, near Vryburg within the Naledi Local Municipality in the North West Province.

b) Page 3: The activity description for activity 1

From:

The activity is triggered since the proposed solar energy facility will generate up to 115 MW of electricity.

Amended to:

The activity is triggered since the proposed solar energy facility will generate up to 150 MW of electricity.

c) Page 5: The description following the coordinates for the facility

From

- for the 115 MW Sonbesie Photovoltaic Solar Energy Facility on the Remaining Extent of Farm Retreat No. 671, Registration Division IN, near Vryburg within the Naledi Local Municipality in the North West Province, hereafter referred to as "the property".

Amended to:

"- for the 150 MW Sonbesie Photovoltaic Solar Energy Facility on the Remaining Extent of Farm Retreat No. 671, Registration Division IN, near Vryburg within the Naledi Local Municipality in the North West Province, hereafter referred to as "the property."

d) Page 5: The Sonbesie Photovoltaic Solar Energy Facility will comprise of all the initial approved associated infrastructure and inclusion/addition of the battery storage facility up to 6hectares in extent within the initial development footprint boundaries and the new corner five (5) coordinates for the Sonbesie BESS as stated above "page 1".

e) Page 6: The table summarising the technical details of the proposed facility

1. **Export capacity**

From:

Export capacity – Up to 100 MW (Installed capacity will be up to 115 MW and the export capacity will be up to 100 MW).

Amended to:

Export capacity – Installed capacity will be up to 150 MW.

2. **Height of installed panels**

From

Height of installed panels from ground level – 3.5 meters

Amended to:

Height of installed panels from ground level – 6 meters.

3. **Increasing the number of inverters:**

From

A minimum of 34

Amended to:

A minimum of 50

4. **Internal Roads**

From:

Width and length of internal roads: Access road: 6m, length: 27m and secondary internal roads – width: 5m, length: 13.7km.

Amended to:

Width and length of internal roads: Access road: 6m, perimeter road: width: 7.8m and internal roads – width: 6m, length: 9935m.

f) **Page 8: Condition 14- this amended is not approved.**

The final development layout map as submitted with the EIAR dated August 2016 is not approved. The preferred layout is located in an area with a high number of camel thorn trees; as such the layout plan must be submitted to the Department of Agriculture, Forestry and Fisheries for comments to determine adequate micro siting of the facility.

Amendment 5: revised layout within the development footprint is not approved

This amendment is intend to change in the initial location of inverters, buildings and internal roads and change in the number of modules within the development footprint (revised layout).

Reasons for refusing Condition 14 and Amendment 5:

The initial Layout Plan submitted with the EIAR dated August 2016 was not approved. Therefore, you are required to comply with Condition 14 (Page 7) of the EA dated 29 November 2016. Furthermore, the EMPr was not approved. The applicant has not yet adhered to condition 14 (Page 7), condition 15-16 (page 8), and condition 17-18 (page 9) of the EA dated 29 November 2016. You are therefore required to comply to all the conditions of the EA as stated above and further required to compile a comprehensive Layout Plan for approval that comprises all the changes in the initial EA, viz, the inclusion of battery storage and the spacing between panels, the changed in the citing of the infrastructure as well as the sizes of the demarcated areas for the associated infrastructure (viz, substation, laydown area, office, staff room and security room). New location of inverters, buildings and internal access roads. The EMPr will also need to be amended to reflect the entire new changes in the Layout Plan.

Reasons for amendments:

- (i) The inclusion of a battery storage system (BESS) is because of the ongoing improvement in battery storage technology and the significant advantages of combining battery storage with renewable

generation, it is proposed that battery energy storage systems "BESS" be included for this project in order to meet the requirements to tender the project for the new generation capacity under the Risk Mitigation Independent Power Producer Procurement Program (RMIPPPP) by the Department of Mineral Resources and Energy (DMRE). One of the DMRE's conditions to tender the project under the RMIPPPP is that all projects must be able to operate between 5h00 and 21h30 in order to supply the grid during peak hours early in the morning and late afternoon when the sun has set, which can only be done by using a battery storage system. The battery storage system will therefore improve the desirability of the proposed project as well as its efficiency. The capacity of the battery storage facility per project will be kept in standard shipment containers or smaller containers ("blocks") as might be proposed by selected supplier with an area of approximately 6ha (new corner coordinates of the proposed BESS needed to be developed). The battery storage facility will be located within the already authorised PV plant footprint area.

- (ii) The increasing capacity of 115MWdc to up to 150MWdc is due to new and advanced technology of panels (470W and Bi-facial) the same amount of panels may be used as specified previously but will be able to generate more megawatts on the same area. The DMRE no longer caps projects at 75MW under the RMIPPPP, which means that developers may tender for larger capacity (if the grid can accommodate it).
- (iii) The increasing of height of the panels is because of the new advanced panel technology that will result in the increase in the height of the panels to approximately 6 meters hence the amendment is required.
- (iv) The increasing number of inverters are due to the increase in MWdc capacity, more inverters are needed to convert the increased DC capacity to AC. The minimum inverters needed to be amended from 34 to a minimum of 50.

This proposed amendment letter must be read in conjunction with the EA dated 29 November 2016 as amended.

In terms of the Promotion of Administrative Justice Act, 2000 (Act No 3 of 2000), you are entitled to the right to fair, lawful and reasonable administrative action; and to written reasons for administrative action that affects you negatively. Further your attention is drawn to the provisions of the Protection of Personal Information Act, 2013 (Act no. 4 of 2013) which stipulates that the Department should conduct itself in a responsible manner when collecting, processing, storing and sharing an individual or another entity's personal information by holding the Department accountable should the Department abuses or compromises your personal information in any way.

In terms of Regulation 4(2) of the Environmental Impact Assessment Regulations, 2014, as amended (the EIA Regulations), you are instructed to notify all registered interested and affected parties, in writing and within 14 (fourteen) days of the date of the EA, of the Department's as well as the provisions regarding the submission of appeals that are contained in the Regulations.

Your attention is drawn to Chapter 2 of National Environmental Management Act, 1998 (Act No. 107 of 1998) National Appeal Regulations published under Government Notice R993 in Government Gazette No. 38303 dated 08 December 2014 (National Appeal Regulations, 2014), which prescribe the appeal procedure to be followed. Kindly include a copy of this document (National Appeal Regulations, 2014) with the letter of notification to interested and affected parties in this matter.

Should any person wish to lodge an appeal against this decision, he/she must submit the appeal to the appeal administrator, and a copy of the appeal to the applicant, any registered interested and affected party, and any organ of state with interest in the matter within 20 days from the date that the notification of the decision was sent to the registered interested and affected parties by the applicant; or the date that the notification of the decision was sent to the applicant by the Department, whichever is applicable.

Appeals must be submitted in writing in the prescribed form to:

The Director: Appeals and Legal Review of this Department at the below mentioned addresses.

By email: appeals@environment.gov.za


By hand: Environment House
473 Steve Biko Road
Arcadia
PRETORIA
0083 or

By post: Private Bag X447
PRETORIA
0001

Please note that in terms of Section 43(7) of the National Environmental Management Act, Act No. 107 of 1998, as amended, the lodging of an appeal will suspend the environmental authorisation or any provision or condition attached thereto. In the instance where an appeal is lodged, you may not commence with the activity until such time that the appeal is finalised.

To obtain the prescribed appeal form and for guidance on the submission of appeals, please visit the Department's website at https://www.environment.gov.za/documents/forms#legal_authorisations or request a copy of the documents at appeals@environment.gov.za

Yours faithfully,



Mr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment

Date: 12/05/2021

CC:	Carli Steenkamp	Environamics CC	E-mail: carli@environamics.co.za
	Ouma Skosana	North West Department of Economic Development, Environment, Conservation and Tourism	Email: oskosana@nwpg.gov.za

