

# SCOPING REPORT

Draft – 15 February 2023

**THE PROPOSED CARMEL SOLAR 3  
PHOTOVOLTAIC SOLAR ENERGY  
FACILITY AND GRID CONNECTION  
INFRASTRUCTURE NEAR CARLETONVILLE  
GAUTENG AND NORTH WEST  
PROVINCES**



**ENVIRONAMICS**

## PROJECT DETAIL

<b>DFFE Reference No.</b>	:	To be confirmed
<b>Project Title</b>	:	Proposed Carmel Solar 3 Photovoltaic Solar Energy Facility and Grid Connection Infrastructure Near Carletonville, Gauteng and North West Provinces
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## GLOSSARY OF TERMS AND ACRONYMS

BA	Basic Assessment
BAR	Basic Assessment Report
CEA	Cumulative Effects Assessment
DFFE	Department of Forestry, Fisheries and the Environment
DM	District Municipality
DMRE	Department of Mineral Resources and Energy
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
EP	Equator Principles
EPFI	Equator Principles Financial Institutions
Environmental impact	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects.
GNR	Government Notice Regulation
I&AP	Interested and affected party
IDP	Integrated Development Plan
IFC	International Finance Corporation
IPP	Independent Power Producer
IRP	Integrated Resource Plan
kV	Kilo Volt
LM	Local Municipality
Mitigate	Activities designed to compensate for unavoidable environmental damage.
MW	Megawatt
NEMA	National Environmental Management Act No. 107 of 1998
NERSA	National Energy Regulator of South Africa
NWA	National Water Act No. 36 of 1998
PAOI	Project Area of Influence
PPP	Public Participation Process

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PV	Photovoltaic
QDS	Quarter Degree Square
REIPPP	Renewable Energy IPP Procurement Process
SAHRA	South African Heritage Resources Agency
SDF	Spatial Development Framework
SPP	Solar Power Plant
VU	Vegetation Unit

## CONTEXT FOR THE DEVELOPMENT

According to Eskom, the demand for electricity in South Africa has been growing at approximately 3% per annum. This growing demand, fueled by increasing economic growth and social development, is placing increasing pressure on South Africa's existing power generation capacity. Coupled with this, is the growing awareness of environmentally responsible development, the impacts of climate change and the need for sustainable development. The use of renewable energy technologies, as one of a mix of technologies needed to meet future energy consumption requirements is being investigated as part of the national Department of Mineral Resources and Energy's (DMRE) (previously referred to as the Department of Energy) long-term strategic planning and research process.

The primary rationale for the proposed solar photovoltaic (PV) facility is to add new generation capacity from renewable energy to the national electricity mix and to aid in achieving the goal of 42% share of all new installed generating capacity being derived from renewable energy forms, as targeted by DMRE (Integrated Resource Plan Update 2010-2030). The IRP also identifies the preferred generation technologies required to meet the expected demand growth up to 2030 and incorporates government objectives including affordable electricity, reduced greenhouse gas (GHG) emissions, reduced water consumption, diversified electricity generation sources and localisation and regional development. In terms of the Integrated Resource Plan Update (2019 IRP Update, 2010-2030), over the short term (of the next two or three years), clear guidelines arose; namely to continue with the current renewable bid programme with additional annual rounds of 1000 MW PV, with approximately 8.4GW of the renewable energy capacity planned to be installed from PV technologies over the next twenty years.

The proposed project is intended to form part of the Department of Mineral Resources and Energy's (DMREs) Renewable Energy Independent Power Producer Procurement (REIPPP) Programme or any other programmes/opportunities to generate power in South Africa. The REIPPP Programme aims to secure 14 725 Megawatts (MW) of new generation capacity from renewable energy sources, while simultaneously diversifying South Africa's electricity mix. According to the 2021 State of the Nation Address, Government will soon be initiating the procurement of an additional 11 800 MW of power from renewable energy, natural gas, battery storage and coal in line with the Integrated Resource Plan 2019 and fulfilling their commitments under the United Nations Framework Convention on Climate Change and its Paris Agreement which include the reduction of greenhouse gas emissions. Eskom, our largest greenhouse gas emitter, has committed in principle to net zero emission by 2050 and to increase its renewable capacity.

In response to the above, Carmel Solar 3 (Pty) Ltd is proposing the development of a photovoltaic solar facility and associated infrastructure for the purpose of commercial electricity generation on an identified site located on Remaining Extent, Portion 1 and Portion 3 of the Farm Kleinfontein No. 141; Portion 4 of the Farm Turffontein No. 126; and Portions 1, 11, 23 and 28 of the Farm Doornfontein No. 118, Registration Division IQ, Gauteng and North West Provinces situated within the Merafong Local Municipality (Gauteng Province) and JB Marks Local Municipality (North West Province) area of jurisdiction (refer to Figure B for the locality map). From a regional site selection

perspective, this region is preferred for solar energy development due to its global horizontal irradiation value of around 2118 kwh/m<sup>2</sup>.

The project entails the generation of up to 240 MW electrical power through photovoltaic (PV) technology. The total area assessed comprises of approximately 323 ha proposed for the PV facility (including supporting infrastructure) with an additional 80 ha assessed for the proposed grid connection corridor. Based on the environmental constraints identified on the project site, it is anticipated that the development footprint of the PV facility (including supporting infrastructure) will be reduced. Furthermore, the development footprint of the grid connection will also be reduced and restricted to pylon footprints only

The Carmel Solar 3 PV facility forms a part of the Carletonville Solar Cluster comprising a total of five (05) proposed PV facilities located in close proximity to one another. Each solar PV facility is concurrently undergoing individual S&EIR processes.

## EXECUTIVE SUMMARY

Like many other developing municipalities in the country, the Merafong City Local Municipality faces a number of challenges in addressing the needs of sustainable growth and providing quality services (IDP, 2020/2021). The Merafong City Local Municipality, IDP (2020/2021), has identified specific issues that require special attention including but not limited to poverty; job creation; unemployment; and inequalities. Additionally, the JB Marks Local Municipality indicates that for the municipality to improve the lives of the people, issues should be prioritised include the following: land and housing; job creation; agriculture, rural and economic development; water and sanitation; safe community; vulnerable groups empowerment; energy (electricity); storm water drainage; sports and recreation; health and welfare; environment; and quality sustainable service delivery (IDP, 2019/2020).

These Local Municipalities does not regard the development of an IDP as the only requirement prevailing legislation. Therefore, there are specific reasons why the municipality should prepare the IDP. One of the main reasons is that developmental responsibilities have been prescribed by the Constitution, which is aimed at ensuring quality for the life of the municipality's residents. The responsibility does not only relate to the provision of basic services, but also include job creation as well as the promotion of accountability and eradication of poverty within a municipality. The IDP considers the economic structure and performance and how a municipality relies heavily on the agricultural and mining sector and the general decline of the sector. It indicates that alternative sectors to the declining sectors of the area needs to be explored, which includes the renewable energy sector.

Carmel Solar 3 (Pty) Ltd intends to develop a 240 MW photovoltaic solar facility and associated infrastructure on Remaining Extent, Portion 1 and Portion 3 of the Farm Kleinfontein No. 141; Portion 4 of the Farm Turffontein No. 126; and Portions 1, 11, 23 and 28 of the Farm Doornfontein No. 118, Registration Division IQ, Gauteng and North West Provinces situated within the Merafong City Local Municipality, West Rand District Municipality (Gauteng Province); and the JB Marks Local Municipality, Dr Kenneth Kaunda District Municipality (North West Province) area of jurisdiction. The town of Carletonville is located approximately 18 km north east of the proposed development (refer to Figure B and C for the locality and regional map). The total area assessed comprises of approximately 323 ha proposed for the PV facility (including supporting infrastructure) with an additional 80 ha assessed for the proposed grid connection corridor. The site was identified as being highly desirable due to its suitable climatic conditions, topography (i.e., in terms of slope), environmental conditions (i.e., low agricultural potential, low ecological sensitivity and archaeology), proximity to a grid connection point (i.e., for the purpose of electricity evacuation), as well as site access via a main road (i.e., to facilitate the movement of machinery, equipment, infrastructure and people during the construction phase).

In terms of the National Environmental Management Act (Act 107 of 1998), with specific reference to Sections 24 and 24D, as read with GNR 324-327, as amended (2017), Environmental Authorisation is required for the Carmel Solar 3 PV facility. The following listed activities have been identified with special reference to the proposed development and are listed in the EIA Regulations (as amended):



- Activity 11(i) (GN.R. 327): *“The development of facilities or infrastructure for the transmission and distribution of electricity outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts.”*
- Activity 12(ii)(a)(c) (GN.R. 327): *“The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (a) within a watercourse or (c) within 32 meters of a watercourse measured from the edge of a watercourse.”*
- Activity 19 (GNR 327): *“The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse.”*
- Activity 24 (ii) (GN.R 327): *“The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters.”*
- Activity 27 (GN.R. 327): *“The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation...”*
- Activity 28(ii) (GN.R. 327): *“Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare.”*
- Activity 56 (ii) (GN.R 327): *“The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre (ii) where no reserve exists, where the existing road is wider than 8 metres...”*
- Activity 1 (GN.R. 325): *“The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more...”*
- Activity 15 (GN.R. 325): *“The clearance of an area of 20 hectares or more of indigenous vegetation...”*
- Activity 4 (c)(iv) (GN.R 324): *“The development of a road wider than 4 metres with a reserve less than 13,5 metres within (c) the Gauteng province, (iv) Sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”*
- Activity 10 (c)(iv) (GN.R 324): *“The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (c) the Gauteng province, (iv) Sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”*
- Activity 12 (c)(ii) (GN.R 324): *“The clearance of an area of 300 square metres or more of indigenous vegetation (c) in the Gauteng Province, (ii) within Critical Biodiversity Areas or*



*Ecological Support Areas identified in the Gauteng Conservation Plan or bioregional plans.”*

- Activity 14(ii)(c)(c)(iv) (GN.R 324): *“The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more, where such development occurs (c) within 32 metres of a watercourse, measured from the edge of a watercourse (c) within the Gauteng Province, within (iv) sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”*
- Activity 18 (c)(iv) (GN.R 324): *“The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (c) in the Gauteng Province within (iv) sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”*
- Activity 18 (h)(v) (GN.R 324): *“The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (h) in the North West Province within (v) Critical Biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority.”*

Activities required for the development of the solar facility which are listed under Listing Notice 1, 2 and 3 (GNR 327, 325 and 324) implies that the development could potentially have an impact on the environment that will require mitigation. Subsequently a ‘thorough assessment process’ is required as described in Regulations 21-24 of the EIA Regulations in order to obtain Environmental Authorisation. Environamics has been appointed as the independent consultant to undertake the Scoping and Environmental Impact Reporting (S&EIR) on behalf of Carmel Solar 3 (Pty) Ltd.

Regulation 21 of the EIA Regulations requires that a scoping report must contain the information set out in Appendix 2 of the Regulations or comply with a protocol or minimum information requirements relevant to the application as identified and gazetted by the Minister in a government notice. Appendix 2 of GNR326 requires that information which is necessary for a proper understanding of the process, informing all preferred alternatives, including location alternatives, the scope of the assessment, and the consultation process undertaken be set out in the scoping report.

The potentially sensitive areas which have been identified through the environmental scoping study are detailed in the chapters to follow. The scoping phase provides a high-level overview of the sensitivity on the Carmel Solar 3 project site. The detail is based on the desktop review of available baseline information for the project site, as well as the sensitivity data received from specialist studies undertaken during the scoping phase. During the scoping phase, the affected area was investigated in sufficient detail in order to provide reliable insight into the potential for constraining factors on the site. The sensitivity map/s (which will be compiled during the EIA phase) must be used as a tool by the developer to avoid any areas flagged to be of higher risk or sensitivity, which must in turn inform the development layout that will be further investigated during the EIA Phase in order to develop an environmentally suitable, reasonable and practical facility layout for the Carmel Solar 3 PV facility.

Based on the high-level assessments undertaken to inform this scoping process, it has been predicted that the proposed development will have a net positive impact for the area and will subsequently ensure the optimal utilisation of resources and land. All negative environmental impacts can be effectively mitigated through the recommended mitigation measures and no residual negative impacts are foreseen. The potentially most significant environmental impacts associated with the development, as identified in this scoping phase, are briefly summarised below.

It must be noted that the Environmental Impact Assessment (EIA) phase of the project will consider the impacts on a more detailed level and provide feedback on the facility layout for the proposed project.

#### Predicted impacts during the construction phase:

During the construction phase minor negative impacts are foreseen over the short term. The latter refers to a period of 18-24 months. The potentially most significant impacts relate to habitat destruction caused by clearance of vegetation and socio-economic impacts such as the creation of direct and indirect employment opportunities, economic multiplier effects from the use of local goods and services and temporary increase in traffic disruptions and movement patterns.

#### Predicted impacts during the operational phase:

During the operational phase the site will serve as a solar PV energy facility and the potential impacts will take place over a period of 20 – 25 years. The negative impacts are generally associated with habitat destruction caused by clearance of vegetation, displacement of priority avian species from important habitats, collision and electrocutions of avifauna and visual impact of sensitive visual receptors located within a 500m radius of the proposed development and powerline. The provision of sustainable services delivery also needs to be confirmed. The operational phase will have a direct positive impact through the creation of employment opportunities and skills development, development of non-polluting, renewable energy infrastructure and contribution to economic development and social upliftment.

#### Predicted impacts during the decommissioning phase:

The negative impacts generally associated with the decommissioning phase include: habitat destruction caused by clearance of vegetation and the loss of permanent employment. However, skilled staff will be eminently employable and a number of temporary jobs will also be created in the process. It is not expected that the facility will be decommissioned, but rather that the technology used will be upgraded.

#### Cumulative impacts:

Cumulative impacts could arise as other similar projects are constructed in the area. According to the Department of Forestry, Fisheries and Environment database five (05) other solar plants have been proposed in relatively close proximity to the proposed activity.

The potential for cumulative impacts may therefore exist. The Draft Scoping Report includes an assessment of the potential cumulative impacts associated with the proposed development.



Potential cumulative impacts with a significance rating of negative medium during the construction phase relate to: habitat destruction and fragmentation, impact on the characteristics of the watercourse, displacement of priority avian species from important habitats, loss of important avian habitats, impacts of employment opportunities, business opportunities and skills development and impact associated with large-scale in-migration of people. Cumulative impacts during the operational phase relate to: habitat destruction and fragmentation, impacts on the characteristics of the watercourse and visual intrusion. The cumulative effect of the generation of waste was identified as being potentially significant during the decommissioning phase.

Regulation 23 of the EIA Regulations determine that an EIA report be prepared and submitted for the proposed activity after the competent authority approves the final scoping report. The EIA report will evaluate and rate each identified impact and identify mitigation measures that may be required. The EIA report will contain information that is necessary for the competent authority to consider the application for Environmental Authorisation and to reach a decision contemplated in Regulation 24 of the EIA Regulations.

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# 1 INTRODUCTION

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This section aims to introduce the Scoping Report and specifically to address the following requirements of the regulations:

**Appendix 2.** (2) A scoping report (...) must include- (a) details of:

- (i) the EAP who prepared the report; and
- (ii) the expertise of the EAP, including a curriculum vitae.

## 1.1 LEGAL MANDATE AND PURPOSE OF THE REPORT

The National Environmental Management Act identifies listed activities (in terms of Section 24) which are likely to have an impact on the environment. These activities cannot commence without obtaining an Environmental Authorisation (EA) from the relevant competent authority, the Department of Forestry, Fisheries and the Environment (DFFE). Sufficient information is required by the competent authority to make an informed decision and the project is therefore subject to an environmental assessment process which can be either a Basic Assessment Process or a full Scoping and Environmental Impact Assessment process.

The Listing Notices 1, 2 and 3 (GNR 327, 325 and 324) outline the activities that may be triggered and therefore require EA. This implies that the development is considered as potentially having a significant impact on the environment. Subsequently a 'thorough S&EIA assessment process' is required as described in Regulations 21-24. A detailed description of the listed activities that are triggered are included in chapter 2 to follow. According to Appendix 2 of Regulation 326 the objective of the scoping process is to, through a consultative process:

- Identify the relevant policies and legislation relevant to the activity;
- Motivate the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location;
- Identify and confirm the preferred activity and technology alternative through an identification of impacts and risks and ranking process of such impacts and risks;
- Identify and confirm the preferred site, through a detailed site selection process, which includes an identification of impacts and risks inclusive of identification of cumulative impacts and a ranking process of all the identified alternatives focusing on the geographical, physical, biological, social, economic, and cultural aspects of the environment;
- Identify the key issues to be addressed in the assessment phase;
- Agree on the level of assessment to be undertaken, including the methodology to be applied, the expertise required as well as the extent of further consultation to be undertaken to determine the impacts and risks the activity will impose on the preferred

site through the life of the activity, including the nature, significance, consequence, extent, duration and probability of the impacts to inform the location of the development footprint within the preferred site; and

- Identify suitable measures to avoid, manage or mitigate identified impacts and to determine the extent of the residual risks that need to be managed and monitored.

This Draft Scoping Report has been submitted to the DFFE for review and comment. According to Regulation 326 all registered I&APs and relevant State Departments (including Organs of State) must be allowed the opportunity to review and provide comment on the scoping report. The Draft Scoping Report has been made available to I&APs and all relevant State Departments. They have been requested to provide written comments on the report within 30 days of receiving it. All issues to be identified and comments received during the review period will be documented and compiled into a Comments and Response Report to be included as part of this Final Scoping Report. Where comments have been received prior to the release of the Draft Scoping Report for the 30-day review and comment period, these comments have been included in Appendix C5 and C6 and has also been included and responded to in the Comments and Responses Report (Appendix C7).

## 1.2 DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP)

Environamics was appointed by the applicant as the independent EAP to conduct the EIA and prepare all required reports. All correspondence to the EAP can be directed to:

Contact person: Marélie Botha

EAPASA Registration: 2021/3834

Postal Address: 14 Kingfisher Street, Tuscany Ridge Estate, Potchefstroom, 2531

Telephone: 082 493 5166 (Cell)

Electronic Mail: [marelie@environamics.co.za](mailto:marelie@environamics.co.za)

And/or

Contact person: Roschel Maharaj

EAPASA Registration: 2019/824

Postal Address: 14 Kingfisher Street, Tuscany Ridge Estate, Potchefstroom, 2531

Telephone: 063 062 7725 (Cell)

Electronic Mail: [roschel@environamics.co.za](mailto:roschel@environamics.co.za)

Regulation 13(1)(a) and (b) determines that an independent and suitably qualified and experienced EAP should conduct the S&EIR process. In terms of the independent status of the EAP a declaration is attached as Appendix A to this report. The expertise of the EAP responsible for conducting the S&EIR process is also summarized in the curriculum vitae included as part of Appendix A.

### **1.3 DETAILS OF SPECIALISTS**

Table 1.1 provides information on the specialists that have been appointed as part of the S&EIR process. Regulation 13(1)(a) and (b) determines that an independent and suitably qualified, experienced and independent specialist should conduct the specialist study, in the event where the specialist is not independent, a specialist should be appointed to externally review the work of the specialist as contemplated in sub regulation (2), must comply with sub regulation 1. In terms of the independent status of the specialists, their declarations are attached as Appendix E to this report. The expertise of the specialists is also summarized in their respective reports.

**Table 1.1:** Details of specialists

Study	Prepared by	Contact Person	Postal Address	Tel	e-mail
Geotechnical Desktop Study	Delta Geotech	Daniel Miller & Matthew Jones	17 Clearview Place, Beacon Bay, East London, 5241	Tel: +27 81 586 7378	mattew@deltageotech.co.za
Avifauna Scoping Report	Pachnoda Consulting CC	Lukas Niemand	PO Box 72847, Potchefstroom 2522	Cell: 082 214 3738	adrian.haagner@agreencogroup.com
Terrestrial Biodiversity Report	David Hoare Consulting (Pty) Ltd	David Hoare	Postnet Suite #116 Private Bag X025 Lynnwood Ridge 0040	Cell: 083 284 5111	david@davidhoareconsulting.co.za
Animal Species Compliance Statement	David Hoare Consulting (Pty) Ltd	David Hoare	Postnet Suite #116 Private Bag X025 Lynnwood Ridge 0040	Cell: 083 284 5111	david@davidhoareconsulting.co.za
Plant Species Compliance Statement	David Hoare Consulting (Pty) Ltd	David Hoare	Postnet Suite #116 Private Bag X025 Lynnwood Ridge 0040	Cell: 083 284 5111	david@davidhoareconsulting.co.za
Phase 1 Cultural Heritage Impact Assessment	J A van Schalkwyk	J van Schalkwyk	62 Coetzer Avenue, Monument Park, 0181	Cell: 076 790 6777	jvschalkwyk@mweb.co.za
Paleontological Desktop Assessment	Banzai Environmental (Pty) Ltd	Elize Butler	-	Cell: 084 447 8759	info@banzai-group.com
Agricultural Compliance Statement	Johann Lanz Soil Scientist	Johann Lanz	1A Wolfe Street, Wynberg, 7800, Cape Town	Cell: 082 927 9018	johann@johannlanz.co.za
Visual Impact Assessment	Donaway Environmental Consultants	Johan Botha	30 Fouche Street, Steynsrus, 9515	Tel: 082 316 7749	johan@donaway.co.za
Social Impact Assessment	Donaway Environmental Consultants	Johan Botha	30 Fouche Street, Steynsrus, 9515	Cell: 082 493 5166	johan@donaway.co.za
Traffic Impact Assessment	iWink Consulting (Pty) Ltd	Iris Wink	Platteklouf Glen	Cell: 082 691 9096	iris@iwink.co.za





Aquatic Assessment	Ecological	EnviroSci (Pty) Ltd	Dr Brian Colloty	1 Rossini Road, Pari Park, Gqeberha, 6070	Cell: 083 498 3299	brianc@envirosci.co.za
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## 1.4 STATUS OF THE EIA PROCESS

The EIA process is conducted strictly in accordance with the stipulations set out in Regulations 21-24 of Regulation No. 326. Table 1.2 provides a summary of the EIA process and future steps to be taken. It can be confirmed that to date:

- A pre-application meeting request was submitted to DFFE on 16 November 2022.
- It was then confirmed that a pre-application meeting is not required via email dated 22 November 2022.
- A newspaper advertisement was placed in the Carletonville Herald on 10 November 2022, informing the public of the EIA process and for the public to register as I&APs.
- A site visit was conducted by the EAP on 12 October 2022.
- Site notices were erected on site on 14 October 2022 informing the public of the commencement of the EIA process.
- The Background Information Document (BID) was circulated to all I&APs and surrounding landowners on 14 November 2022.
- An application form and the draft Scoping Report has been submitted to DFFE on 15 February 2023.
- The draft Scoping Report has been made available for a 30-day review and comment period from 15 February 2023 to 16 March 2023.

It is envisaged that the Final Scoping Report will be submitted to the Department in March 2023 and that the Final Scoping Report will be accepted by the Department in May 2023. The S&EIR process should be completed within approximately nine months of submission of the Draft Scoping Report, i.e., by October 2023 – see Table 1.2.

**Table 1.2:** Estimated timeframe for completion of the ‘scoping and EIA process’

Activity	Prescribed timeframe	Timeframe
Site visit		12 October 2022
Public participation (BID)	30 Days	14 November – 14 December 2022
Submit application form and DSR	-	15 February 2023
Public participation (DSR)	30 Days	15 February 2023 – 16 March 2023
Submit FSR	44 Days	March 2023
Department acknowledges receipt	10 Days	March 2023

Department approves/reject	43 Days	By May 2023
Public participation (DEIR)	30 Days	May – June 2023
Submission of FEIR & EMPr	-	June 2023
Department acknowledges receipt	10 Days	June 2023
Decision	107 Days	October 2023
Department notifies of decision	5 Days	October 2023
Registered I&APs notified of decision	14 Days	October 2023
Appeal	20 Days	October/November 2023

Table 1.3 below provides more detail on timeframes as well as process flow for the S&EIR process.

**Table 1.3:** Estimated, timeframe for completion of the 'S&EIR processes' for Carmel Solar 3 PV facility

Tasks to be performed	October				November				December				January				February				March				April				May				June				July				August				September				October							
	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4				
<b>REGISTRATION PHASE</b>																																																								
Pre-application meeting (DFE doesn't require meeting)							X																																																	
Site visits		X																																																						
<b>Public participation</b>																																																								
- Press advertisement							X																																																	
- On site advertisement		X																																																						
- Distribution of notices							X																																																	
- Complete PP report																X																																								
<b>Specialist inputs and reports</b>																																																								
- Draft terms of reference																																																								
- Receive specialist studies																X																																								
<b>'Draft' Scoping Report</b>																																																								
- Information gathering																X																																								
- Report writing																X																																								
- Circulate 'Draft' Scoping Report																																																								
<b>SCOPING PHASE</b>																																																								
<b>Complete and submit application form</b>																																																								
- Information gathering																																																								
- Complete and submit application form																X																																								
<b>Authority acknowledges receipt of application form</b>																X																																								
<b>Final Scoping Report</b>																																																								
- Information gathering																																																								
- Report writing																																																								
- Submission of Final Scoping Report																				X																																				
- Approval																																																								
<b>EIA PHASE</b>																																																								
<b>Specialist inputs and reports</b>																																																								
- Draft terms of reference																																																								
- Receive specialist studies																																																								
<b>Draft EIR Report</b>																																																								
- Circulate																																																								
<b>Final EIA Report &amp; EMP</b>																																																								
- Submission																																																								

The competent authority has 107 days for decision-making after the EIR has been submitted and an additional 5 days to notify the applicant in writing of their decision. The applicant must within 14 days of the date of the decision notify registered I&APs of the decision. Registered I&APs are then provided 20 days in which to lodge appeals. The appeal period expires 20 days after registered I&APs have been informed of the decision according to GNR326, Regulation 7.

## 1.5 SPECIALIST STUDIES IDENTIFIED IN THE DFFE SCREENING TOOL REPORT

The table included below provides an indication of the specialist studies identified by the DFFE Screening Tool Report (Appendix B), an indication of whether the studies were undertaken or not and a motivation or confirmation of the studies being included or not.

**Table 1.4:** Specialist studies identified by the DFFE Screening tool for the PV facility and specialist studies completed

Study identified in the DFFE Screening Tool and sensitivity	Study included?	Appendix
Agricultural Impact Assessment Sensitivity: High	Yes	An Agricultural Compliance Statement is included in Appendix E5 of the Scoping Report.
Animal Species Assessment Sensitivity: Medium	Yes	An Animal Species Compliance Statement is included in Appendix E2 of the Scoping Report.
Aquatic Biodiversity Impact Assessment Sensitivity: Very High	Yes	An Aquatic Ecological Impact Assessment is included in Appendix E1.  This assessment has been undertaken in terms of the Protocols of GNR320 – refer to the content of the report.
Archaeological and Cultural Heritage Impact Assessment Sensitivity: Low	Yes	A Heritage Impact Assessment is included in Appendix E6 of the Scoping Report, as per the requirements of the National Heritage Resources Act.
Avian Impact Assessment Sensitivity: Low	Yes	An Avifaunal scoping report is included in Appendix E3.
Civil Aviation Assessment Sensitivity: Low	No	The identification of the site as low sensitivity considering civil aviation is agreed to by the EAP. This is based on the current land use of



		<p>the site being used for agricultural purposes.</p> <p>The Civil Aviation Authority has been consulted regarding the development of the project since the commencement of the S&amp;EIR Process. No specific negative impacts or issues have been raised to date by the CAA regarding the project. The project is also not located within an area considered to be of a high sensitivity.</p>
<p>Defence Theme</p> <p>Sensitivity: Low</p>	No	<p>The affected property is confirmed to be used for agricultural purposes and therefore the development will not have any impact on defence installations.</p> <p>The sensitivity for the entire extent of the site is low and therefore no assessment has been included.</p> <p>The South African National Defence Force has been consulted regarding the development of the project since the commencement of the S&amp;EIR Process. No specific negative impacts or issues have been raised to date regarding the project. The project is also not located within an area considered to be of a high sensitivity.</p>
<p>Landscape / Visual Impact Assessment</p> <p>Sensitivity: Very High</p>	Yes	<p>A Visual Impact Assessment is included in Appendix E4 of the Scoping Report.</p>
<p>Palaeontological Impact Assessment</p> <p>Sensitivity: Very High</p>	Yes	<p>A Palaeontological Impact Assessment is included in Appendix E7 of the Scoping Report,</p>



		as per the requirements of the National Heritage Resources Act.
Plant species Assessment Sensitivity: Medium	Yes	A Plant Species Compliance Statement is included in Appendix E2 of the Scoping Report.
RFI Assessment Sensitivity: Medium	No	The RFI theme sensitivity is medium for the entire extent of the project. The South African Radio Astronomy Observatory (SARAO) has been consulted regarding the development of the project since the commencement of the S&EIR Process. No specific negative impacts or issues have been raised to date by the SARAO regarding the project. The project is also not located within an area considered to be of a high sensitivity.
Terrestrial Biodiversity Impact Assessment Sensitivity: Very High	Yes	<p>A Terrestrial Biodiversity Impact Assessment is included in Appendix E2.</p> <p>This assessment has been undertaken in terms of the Protocols of GNR320 – refer to the content of the report.</p>
Geotechnical Assessment Sensitivity: Not indicated	Yes	<p>The detailed Geotechnical Assessment will be conducted before construction begins as part of the micro-siting of the facility layout.</p> <p>The consideration of geotechnical aspects is considered to be of a technical concern rather than an environmental concern.</p>

		A Desktop Geotechnical Assessment is included in Appendix E10.
Socio-Economic Assessment Sensitivity: Not indicated	Yes	A Social Impact Assessment is included in Appendix E8.

**Table 1.5:** Specialist studies identified by the DFFE screening tool for the powerline and specialist studies conducted

<b>Study identified in the DFFE Screening Tool and sensitivity</b>	<b>Study included?</b>	<b>Appendix</b>
Agricultural Impact Assessment Sensitivity: High	Yes	An Agricultural Compliance Statement is included in Appendix E5 of the Scoping Report.
Animal Species Assessment Sensitivity: Medium	Yes	An Animal Species Compliance Statement is included in Appendix E2 of the Scoping Report.
Aquatic Biodiversity Impact Assessment Sensitivity: Very High	Yes	An Aquatic Ecological Impact Assessment is included in Appendix E1.  This assessment has been undertaken in terms of the Protocols of GNR320 – refer to the content of the report.
Archaeological and Cultural Heritage Impact Assessment Sensitivity: Low	Yes	A Heritage Impact Assessment is included in Appendix E6 of the Scoping Report, as per the requirements of the National Heritage Resources Act.
Civil Aviation Assessment Sensitivity: High	No	The proposed length of the grid corridor lies between medium and high sensitivity with on a very small portion within high sensitivity. The proposed activity is approximately 8 and 15 km from other civil





		<p>aviation aerodrome. The grid corridor length is relatively short i.e., 8 km from the proposed PV facility which was identified as low sensitivity. The proposed pylons are anticipated to only reach a height of up to 32m from the ground. It is not anticipated that the proposed activities will cause any interference with civil aviation aerodromes located at a fair distance away.</p> <p>The Civil Aviation Authority has been consulted regarding the development of the project since the commencement of the S&amp;EIR Process. No specific negative impacts or issues have been raised to date by the CAA regarding the project. The project is also not located within an area considered to be of a high sensitivity.</p>
Defence Theme Sensitivity: Low	No	<p>The affected property is confirmed to be used for agricultural purposes and therefore the development will not have any impact on defence installations.</p> <p>The sensitivity for the entire extent of the site is low and therefore no assessment has been included.</p> <p>The South African National Defence Force has been consulted regarding the development of the project since the commencement of the S&amp;EIR Process. No specific negative impacts or issues have been raised to date regarding the project. The project is also not</p>



		located within an area considered to be of a high sensitivity.
Palaeontological Impact Assessment Sensitivity: Very High	Yes	A Palaeontological Impact Assessment is included in Appendix E7 of the Scoping Report, as per the requirements of the National Heritage Resources Act.
Plant species Assessment Sensitivity: Medium	Yes	A Plant Species Compliance Statement is included in Appendix E2 of the Scoping Report.
Terrestrial Biodiversity Impact Assessment Sensitivity: Very High	Yes	A Terrestrial Biodiversity Impact Assessment is included in Appendix E2.  This assessment has been undertaken in terms of the Protocols of GNR320 – refer to the content of the report.

## 1.6 STRUCTURE OF THE REPORT

This report is structured in accordance with the prescribed contents stipulated in Appendix 2 of Regulation No.326. It consists of eight sections demonstrating compliance to the specifications of the regulations as illustrated in Table 1.6.

**Table 1.6:** Structure of the report

Requirements for the contents of a scoping report as specified in the Regulations		Section in report
(a)	details of -	1
	(i) the EAP who prepared the report; and	
	ii) the expertise of the EAP, including a curriculum vitae.	
(b)	the location of the activity, including-	2
	(i) the 21-digit Surveyor General code of each cadastral land parcel;	
	(ii) where available, the physical address and farm name;	
	(iii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties;	
(c)	a plan which locates the proposed activity or activities applied for at an appropriate scale, or, if it is-	2
	(i) a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or	
	(ii) on land where the property has not been defined, the coordinates within which the activity is to be undertaken;	
(d)	a description of the scope of the proposed activity, including-	2
	(i) all listed and specified activities triggered;	
	(ii) a description of the activities to be undertaken, including associated structures and infrastructure.	
(e)	A description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process;	3

(f)	a motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location;	4
(g)	<p>a full description of the process followed to reach the proposed preferred activity, site and location of the development footprint within the site, including –</p> <p>(i) details of all the alternatives considered;</p> <p>(ii) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;</p> <p>(iii) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them.</p> <p>(iv) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</p> <p>(ix) the outcome of the site selection matrix;</p> <p>(x) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such and</p> <p>(xi) a concluding statement indicating the preferred alternatives, including preferred location of the activity;</p>	5
(g)	<p>(v) the impacts and risks which have informed the identification of each alternative, including the nature, significance, consequence, extent, duration and probability of such identified impacts, including the degree to which these impacts- (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated;</p> <p>(vi) the methodology used in identifying and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;</p> <p>(vii) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</p> <p>(viii) the possible mitigation measures that could be applied and level of residual risk;</p>	6

(i)	<p>a plan of study for undertaking the environmental impact assessment process to be undertaken, including-</p> <p>(i) a description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity;</p> <p>(ii) a description of the aspects to be assessed as part of the EIA process;</p> <p>(iii) aspects to be assessed by specialists;</p> <p>(iv) a description of the proposed method of assessing the environmental aspects, including aspects to be assessed by specialists;</p> <p>(v) a description of the proposed method of assessing duration and significance;</p> <p>(vi) an indication of the stages at which the competent authority will be consulted;</p> <p>(vii) particulars of the public participation process that will be conducted during the EIA process; and</p> <p>(viii) a description of the tasks that will be undertaken as part of the EIA process;</p> <p>(ix) identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored.</p>	8
(j)	<p>an undertaking under oath or affirmation by the EAP in relation to-</p> <p>(i) the correctness of the information provided in the report;</p> <p>(ii) the inclusion of comments and inputs from stakeholders and interested and affected parties; and</p> <p>(iii) any information provided by the EAP to I&amp;APs and any responses by the EAP to comments or inputs made by I&amp;APs;</p>	Appendix A to the report
(k)	<p>an undertaking under oath or affirmation by the EAP in relation to the level of agreement between the EAP and I&amp;APs on the plan of study for undertaking the EIA;</p>	
(l)	<p>where applicable, any specific information required by the CA; and</p>	N/A
(m)	<p>any other matter required in terms of section 24(4)(a) and (b) of the Act.</p>	N/A

## 2 ACTIVITY DESCRIPTION

This section aims to address the following requirements of the regulations:

**Appendix 2.** (2) A scoping report (...) must include-

(b) the location of the activity, including-

- (i) the 21-digit Surveyor General code of each cadastral land parcel;
- (ii) where available, the physical address and farm name;
- (iii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties;

(c) a plan which locates the proposed activity applied for at an appropriate scale, or, if it is-

- (i) a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or
- (ii) on land where the property has not been defined, the coordinates within which the activity is to be undertaken;

(d) a description of the scope of the proposed activity, including-

- (i) all listed and specified activities triggered;
- (ii) a description of the activities to be undertaken, including associated structures and infrastructure.

### 2.1 THE LOCATION OF THE ACTIVITY AND PROPERTY DESCRIPTION

The project entails the development of a photovoltaic solar facility and associated infrastructure on Remaining Extent, Portion 1 and Portion 3 of the Farm Kleinfontein No. 141; Portion 4 of the Farm Turffontein No. 126; and Portions 1, 11, 23 and 28 of the Farm Doornfontein No. 118, Registration Division IQ, Gauteng and North West Provinces situated within the Merafong Local Municipality (Gauteng Province) and JB Marks Local Municipality (North West Province) area of jurisdiction. The proposed development is located in the Gauteng and North West Provinces in the northern interior of South-Africa (refer to Figure C for the regional map). The town of Carletonville is located approximately 18 km northeast of the proposed development (refer to Figure B for the locality map).

The project entails the generation of up to 240 MW electrical power through the installation and operation of photovoltaic (PV) panels. The total area assessed comprises of approximately 323 ha proposed for the PV facility (including supporting infrastructure) with an additional 80 ha assessed for the proposed grid connection corridor. Based on the environmental constraints identified on the project site, it is anticipated that the development footprint of the PV facility (including supporting infrastructure) will be reduced. Furthermore, the development footprint of the grid

connection will also be reduced and restricted to pylon footprints only. The full extent of the development area has been considered during scoping with the aim of confirming the suitability from an environmental and social perspective. A development footprint will be defined based on the outcomes of the scoping phase and will be further assessed in the EIA phase. The property on which the facility is to be constructed will be leased by Carmel Solar 3 (Pty) Ltd from the property owner for the life span of the project (minimum of 20 years).

Energy generated by the facility will be transmitted from the facility substation/Eskom switching station to the Carmel Main Transmission Substation via a new 132kV powerline.

**Table 2.1:** General site information

Description of affected farm portion	<p><u>Solar PV Facility:</u></p> <ul style="list-style-type: none"> <li>• Remaining Extent of the Farm Kleinfontein No. 141</li> <li>• Portion 1 of the Farm Kleinfontein No. 141</li> </ul> <p><u>Proposed Powerline:</u></p> <ul style="list-style-type: none"> <li>• Portion 1 of the Farm Kleinfontein No. 141</li> <li>• Portion 3 of the Farm Kleinfontein No. 141</li> <li>• Portion 1 of the Farm Doornfontein No. 118</li> <li>• Portion 11 of the Farm Doornfontein No. 118</li> <li>• Portion 23 of the Farm Doornfontein No. 118</li> <li>• Portion 28 of the Farm Doornfontein No. 118</li> </ul> <p><u>Proposed Access Road:</u></p> <ul style="list-style-type: none"> <li>• Remaining Extent of the Farm Kleinfontein No. 141</li> <li>• Portion 1 of the Farm Kleinfontein No. 141</li> <li>• Portion 4 of the Farm Turffontein No. 126</li> </ul>
Province	Gauteng and North West
District Municipality	West Rand District Municipality & Dr Kenneth Kaunda District Municipality
Local Municipality	Merafong City Local Municipality & JB Marks Local Municipality
Ward numbers	Ward 12

Closest towns	The town of Carletonville is located approximately 18 km northeast of the proposed development.
21 Digit Surveyor General codes	<p><u>Solar PV Facility</u></p> <ul style="list-style-type: none"> <li>• Remaining Extent of the Farm Kleinfontein No. 141 TOIQ00000000014100000</li> <li>• Portion 1 of the Farm Kleinfontein No. 141 TOIQ00000000014100001</li> </ul> <p><u>Proposed Powerline:</u></p> <ul style="list-style-type: none"> <li>• Portion 1 of the Farm Kleinfontein No. 141 TOIQ00000000014100001</li> <li>• Portion 3 of the Farm Kleinfontein No. 141 TOIQ00000000014100003</li> <li>• Portion 1 of the Farm Doornfontein No. 118 TOIQ00000000011800001</li> <li>• Portion 11 of the Farm Doornfontein No. 118 TOIQ00000000011800011</li> <li>• Portion 23 of the Farm Doornfontein No. 118 TOIQ00000000011800023</li> <li>• Portion 28 of the Farm Doornfontein No. 118 TOIQ00000000011800028</li> </ul> <p><u>Proposed Access Road:</u></p> <ul style="list-style-type: none"> <li>• Remaining Extent of the Farm Kleinfontein No. 141 TOIQ00000000014100000</li> <li>• Portion 1 of the Farm Kleinfontein No. 141 TOIQ00000000014100001</li> <li>• Portion 4 of the Farm Turffontein No. 126 TOIQ00000000012600004</li> </ul>
Title Deed	<u>Solar PV Facility:</u>



	<ul style="list-style-type: none"> <li>• Remaining Extent of the Farm Kleinfontein No. 141               <ul style="list-style-type: none"> <li>○ To be confirmed</li> </ul> </li> <li>• Portion 1 of the Farm Kleinfontein No. 141               <ul style="list-style-type: none"> <li>○ To be confirmed</li> </ul> </li> </ul> <p><u>Proposed Powerline:</u></p> <ul style="list-style-type: none"> <li>• Portion 1 of the Farm Kleinfontein No. 141               <ul style="list-style-type: none"> <li>○ To be confirmed</li> </ul> </li> <li>• Portion 3 of the Farm Kleinfontein No. 141               <ul style="list-style-type: none"> <li>○ To be confirmed</li> </ul> </li> <li>• Portion 1 of the Farm Doornfontein No. 118               <ul style="list-style-type: none"> <li>○ T86110/2014</li> </ul> </li> <li>• Portion 11 of the Farm Doornfontein No. 118               <ul style="list-style-type: none"> <li>○ T86110/2014</li> </ul> </li> <li>• Portion 23 of the Farm Doornfontein No. 118               <ul style="list-style-type: none"> <li>○ T45426/1980</li> </ul> </li> <li>• Portion 28 of the Farm Doornfontein No. 118               <ul style="list-style-type: none"> <li>○ T37012/2018</li> </ul> </li> <li>• Portion 4 of the Farm Turffontein No. 126               <ul style="list-style-type: none"> <li>○ To be confirmed</li> </ul> </li> </ul>
Photographs of the site	Included in Plates as an appendix to the Report
Type of technology	Photovoltaic solar facility
Structure Height	<ul style="list-style-type: none"> <li>• Panels ~6m,</li> <li>• Buildings ~ 9m,</li> <li>• Battery storage facility ~8m</li> <li>• Pylons ~32m</li> </ul>
Battery storage	Within a 5 ha area within the development footprint
Surface area to be covered (development footprint)	Approximately 323 ha

Structure orientation	Monofacial or Bifacial PV panels will be utilised. The panels will either be fixed to a single-axis and/or double horizontal tracking structure where the orientation of the panel varies according to the time of the day, as the sun moves from east to west or tilted at a fixed angle equivalent to the latitude at which the site is located in order to capture the most sun.
Laydown area dimensions (area assessed as part of the EIA)	Temporary laydown areas will occupy up to 5 hectares while 1 hectare will remain in place for the permanent laydown areas as required for facility operation.
Generation capacity	Up to 240 MW
Expected production	N/A - this will be dependent on the chosen technology.

The site is located outside urban areas and is bordered by agricultural (mainly cattle grazing) land uses, as well as mining activities. The site survey revealed that the affected property currently consists of agricultural activities – refer to plates 1-8 for photographs of the affected property and proposed development footprint area.

## 2.2 ACTIVITY DESCRIPTION

The proposed development will trigger the following activities:

**Table 2.2:** Listed activities

Relevant notice:	Activity No (s)	Description of each listed activity as per project description:
GNR. 327 (as amended in 2017)	Activity 11(ii)	<ul style="list-style-type: none"> <li>• <i>“The development of facilities or infrastructure for the transmission and distribution of electricity (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts.”</i></li> <li>• Activity 11(i) is triggered as energy generated by the PV array will be transmitted via underground medium voltage cables (i.e., up to 33kV) to the onsite Carmel Solar 3 132kV substation. The project will also comprise of a 132kV Eskom/switching station. A 132kV overhead powerline is proposed to connect the Eskom switching station and the Carmel Main Transmission substation.</li> </ul>
GNR. 327 (as amended in 2017)	Activity 12(ii)(a)(c)	<ul style="list-style-type: none"> <li>• <i>“The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (a) within a watercourse or (c) within 32 meters of a watercourse measured from the edge of a watercourse.”</i></li> <li>• Activity 12(ii)(a)(c) is triggered as the proposed development is located within 32m of an identified Channelled Valley Bottom Wetland.</li> </ul>
GNR. 327 (as amended in 2017)	Activity 19	<ul style="list-style-type: none"> <li>• <i>“The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse.”</i></li> <li>• Activity 19 is triggered as the project area comprises of existing roads which potentially traverse watercourse. The existing access roads that traverse watercourses may be expanded to suit the project needs and will require removal of more than 10 cubic metres of soil from a watercourse identified by the aquatic specialist.</li> </ul>
GNR. 327 (as amended in 2017)	Activity 24(ii)	<ul style="list-style-type: none"> <li>• <i>“The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters.</i></li> <li>• Activity 24(ii) is triggered as the proposed access roads to Carmel Solar 3 will be up to 8m wide, but with the</li> </ul>

		inclusion of side drains and gavel embankments, will exceed the threshold of this activity.
GNR. 327 (as amended in 2017)	Activity 27	<ul style="list-style-type: none"> <li>• <i>“The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation...”</i></li> <li>• The development of the collector substation will require the clearance of ~1.125 ha of indigenous vegetation</li> </ul>
GNR. 327 (as amended in 2017)	Activity 28(ii)	<ul style="list-style-type: none"> <li>• <i>“Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare.”</i></li> <li>• Activity 28(ii) is triggered as the total area to be developed for the PV facility and associated infrastructure is greater than 1ha and occurs outside an urban area in an area currently zoned for agriculture. The property will be re-zoned to “special” use.</li> </ul>
GNR. 327 (as amended in 2017)	Activity 56(ii)	<ul style="list-style-type: none"> <li>• <i>“The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre (ii) where no reserve exists, where the existing road is wider than 8 metres...”</i></li> <li>• Activity 56 (ii) is triggered as existing roads may require widening of up to 6 m and/or lengthening by more than 1 km, to accommodate the movement of heavy vehicles and cable trenching activities.</li> </ul>
GNR. 325 (as amended in 2017)	Activity 1	<ul style="list-style-type: none"> <li>• <i>“The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more.”</i></li> <li>• Activity 1 is triggered since the proposed photovoltaic solar energy facility will generate up to 240 megawatts electricity through the use of a renewable resource.</li> </ul>
GNR. 325 (as amended in 2017)	Activity 15	<ul style="list-style-type: none"> <li>• <i>“The clearance of an area of 20 hectares or more of indigenous vegetation.”</i></li> <li>• Activity 15 is triggered as the cumulative area of indigenous vegetation to be cleared for the entire Project (excluding linear components) will exceed 20 hectares.</li> </ul>
GNR. 324 (as amended in 2017)	Activity 4 (c)(iv)	<ul style="list-style-type: none"> <li>• <i>“The development of a road wider than 4 metres with a reserve less than 13,5 metres within (c) the Gauteng province, (iv) Sites identified as Critical Biodiversity Areas</i></li> </ul>

		<p><i>(CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”</i></p> <ul style="list-style-type: none"> <li>Activity 4 (c)(iv) is triggered as internal and perimeter access roads with a width of between 6 and 10 meters will be constructed. According to the Terrestrial Biodiversity Impact Assessment, parts of the site are within a Critical Biodiversity Area or an Ecological Support Area</li> </ul>
GNR. 324 (as amended in 2017)	Activity 10 (c)(iv)	<ul style="list-style-type: none"> <li><i>“The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (c) the Gauteng province, (iv) Sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”</i></li> <li>Activity 10(c)(iv) is triggered since the proposed development will need to develop infrastructure for the storage and handling of dangerous goods (diesel and/or oils) in containers with a capacity exceeding 30 but not exceeding 80 cubic metres. According to the Terrestrial Biodiversity Impact Assessment, parts of the site are within a Critical Biodiversity Area or an Ecological Support Area</li> </ul>
GNR. 324 (as amended in 2017)	Activity 12 (c)(ii)	<ul style="list-style-type: none"> <li><i>“The clearance of an area of 300 square metres or more of indigenous vegetation (c) in the Gauteng Province, (ii) within Critical Biodiversity Areas or Ecological Support Areas identified in the Gauteng Conservation Plan or bioregional plans.”</i></li> <li>Activity 12 (c)(ii) is triggered since the proposed development is located in the Gauteng province and portions of the site has not been lawfully disturbed during the preceding ten years and therefore indigenous vegetation is present on the site. According to the Terrestrial Biodiversity Impact Assessment, parts of the site are within a Critical Biodiversity Area or an Ecological Support Area</li> </ul>
GNR. 324 (as amended in 2017)	Activity 14(ii)(c)(c)(iv)	<ul style="list-style-type: none"> <li><i>“The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more, where such development occurs (c) within 32 metres of a watercourse, measured from the edge of a watercourse (c) within the Gauteng Province, within (iv) sites identified as Critical Biodiversity Areas (CBAs) or</i></li> </ul>

		<p><i>Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”</i></p> <ul style="list-style-type: none"> <li>Activity 14(ii)(c)(iv) is triggered as the project is located within the Gauteng Province. A Channelled Valley Bottom wetlands exist east of the site as identified by the aquatic specialist. According to the Terrestrial Biodiversity Impact Assessment, parts of the site are within a Critical Biodiversity Area or an Ecological Support Area</li> </ul>
GNR. 324 (as amended in 2017)	Activity 18 (c)(iv)	<ul style="list-style-type: none"> <li><i>“The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (c) in the Gauteng Province within (iv) sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”</i></li> <li>Activity 18 (c)(iv) is triggered since the existing access road to the site will need to be widened by more than 4 metres. The access road will cross from the Gauteng province and into the North West province. Internal access roads will further require a width of 4m or more. According to the Terrestrial Biodiversity Impact Assessment, parts of the site are within a Critical Biodiversity Area or an Ecological Support Area.</li> </ul>
GNR. 324 (as amended in 2017)	Activity 18 (h)(v)	<ul style="list-style-type: none"> <li><i>“The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (h) in the North West Province within (v) Critical Biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority.”</i></li> <li>Activity 18 (h)(v) is triggered since the existing access road to the site will need to be widened by more than 4 metres. The access road will cross from the North West province into the Gauteng province. According to the Terrestrial Biodiversity Impact Assessment, parts of the site are within a Critical Biodiversity Area or an Ecological Support Area.</li> </ul>

The potentially most significant impacts will occur during the construction phase of the development, which will include the following activities:

- Site clearing and preparation: Certain areas of the site and access road will need to be cleared of vegetation and some areas may need to be levelled.



- Civil works to be conducted:
  - Terrain levelling if necessary– Levelling will be minimal as the potential site chosen is relatively flat.
  - Laying foundation- The structures will be connected to the ground through cement pillars, cement slabs or metal screws. The exact method will depend on the detailed geotechnical analysis.
  - Construction of access and inside roads/paths – The majority of the access road will follow existing, gravel farm roads that may require widening up to 10 m (inclusive of storm water infrastructure). Where new sections of road need to be constructed/lengthened, this will be gravel/hard surfaced access road and only tarred if necessary. A network of gravel internal access roads and a perimeter road of up to 33 km, each with a width of up to 6 m, will be constructed to provide access to the various components of the PV development.
  - Trenching – all Direct Current (DC) and Alternating Current (AC) wiring within the PV plant will be buried underground. Trenches will have a river sand base, space for pipes, backfill of sifted soil and soft sand and concrete layers where vehicles will pass.



### 2.3 PHOTOVOLTAIC TECHNOLOGY

The term photovoltaic describes a solid-state electronic cell that produces direct current electrical energy from the radiant energy of the sun through a process known as the Photovoltaic Effect. This refers to light energy placing electrons into a higher state of energy to create electricity. Each PV cell is made of silicon (i.e., semiconductors), which is positively and negatively charged on either side, with electrical conductors attached to both sides to form a circuit. This circuit captures the released electrons in the form of an electric current (direct current).

The key components of the proposed project are described below:

- PV Panel Array - To produce up to 240 MW, the proposed facility will require numerous linked cells placed behind a protective glass sheet to form a panel. Multiple panels will be required to form the solar PV arrays which will comprise the PV facility. The PV panels will be tilted at a northern angle in order to capture the most sun or using one-axis tracker structures to follow the sun to increase the yield.



**Figure 2.1:** Typical example of solar PV array

- Wiring to Central Inverters - Sections of the PV array will be wired to central inverters. The inverter is a pulse width mode inverter that converts direct current (DC) electricity to alternating current (AC) electricity at grid frequency.





- Connection to the grid - Connecting the array to the electrical grid requires transformation of the voltage from 480V to 33kV to 132kV. The normal components and dimensions of a distribution rated electrical substation will be required. Output voltage from the inverter is 480V and this is fed into step up transformers to 132kV. An onsite substation will be required to step the voltage up to 132kV, after which the power will be evacuated into the national grid. Energy generated by the facility will be transmitted from the facility substation / Eskom switching station to the Carmel Main Transmission Substation via a new 132kV powerline. The Project will inject up to 240 MW into the National Grid.
- Electrical reticulation network – An internal electrical reticulation network will be required and will be laid ~2-4m underground as far as practically possible.
- Supporting Infrastructure – The following auxiliary buildings including a gate house, ablutions, workshops, storage and warehousing areas, site offices and a control centre will be required as well as a 33kV switch room. The project requires the need for both temporary and permanent laydown areas.
- Battery Energy Storage System – A Battery Storage Facility with a maximum height of 8m and development footprint of ~5 ha and associated operational, safety and control infrastructure.
- Roads – The majority of the access road will follow existing, gravel farm roads that may require widening up to 10 m (inclusive of storm water infrastructure). Where new sections of road need to be constructed/lengthened, this will be gravel/hard surfaced access road and only tarred if necessary. A network of gravel internal access roads and a perimeter road (up to 33 km), each with a width of up to ± 6 m, will be constructed to provide access to the various components of the PV development. Access will be obtained via existing farm roads and will connect to the R501 Regional Road.
- Fencing - For health, safety and security reasons, the facility will be required to be fenced off from the surrounding farm. Fencing with a height of 3.5 meters will be used.

## 2.4 LAYOUT DESCRIPTION

The draft layout plan provided within this scoping report considers technical constraints from a 'development viewpoint'. The environmental limitations of the site and aspects such as environmentally sensitive areas, roads, fencing and servitudes on site will be further investigated during the detailed EIA phase – refer to Figure J. The total surface area proposed for the layout includes the PV panel arrays (spaced to avoid shadowing), access and maintenance roads and associated infrastructure (buildings, power inverters, power line, battery energy storage system, on-site substation and switching station and perimeter fences). Limited features of environmental significance exist on site, however the sensitivities that do exist have to be avoided in the layout of the solar facility which will be further assessed during the EIA phase (refer to Figure J).

Table 2.3 below provides detailed information regarding the layout for the proposed facility as per DFFE requirements.

**Table 2.3:** Technical details for the proposed facility

Component	Description / dimensions
Height of PV panels	Up to 5.5 m
Area of PV Array	The total area assessed for the PV array and the associated supporting infrastructure is ~323 ha. A development footprint will be defined during the EIA phase.
Area occupied by inverter / transformer stations / substations / BESS	BESS: up to 5 ha Facility substation: up to 1 ha
Capacity of on-site substation	132kV
Area occupied by both permanent and construction laydown areas	Permanent Laydown Area: Up to 1 Hectares Construction Laydown Area: ~20 Hectares
Area occupied by buildings	A 33 kV switch room, a gate house, ablutions, workshops, storage and warehousing areas, site offices and a control centre: ~ 1Hectare
Battery storage facility	The Battery Storage Facility will occupy an area of up to 5 hectares. Maximum height of the BESS is 8 m.
Length of internal roads	Approximately 33 km
Width of internal roads	Approximately 6 meters <i>N.B: Only the main access roads may be widened up to 10 meters</i>

<b>Height of fencing</b>	Approximately 3.5 meters
<b>Height of powerline</b>	Up to 32 m
<b>Capacity of the power line</b>	132kV
<b>Eskom Switching Station</b>	132kV
<b>Electricity Grid Infrastructure Corridor</b>	The total area assessed for the Electricity Grid Infrastructure ~80 ha. A development footprint will be defined during the EIA phase which is expected to be reduced drastically with restricted to the physical footprint of the pylon structures.
<b>Grid connection corridor width</b>	Up to 100 m assessment corridor
<b>Grid connection corridor length</b>	Up to 8 km assessment corridor
<b>Power line servitude width</b>	Up to 36m
<b>Type of pylon to be used</b>	Lattice or monopole

## **2.5 SERVICES PROVISION**

The following sections provides information on services required on the site e.g., water, sewage, refuse removal, and electricity.

### **2.5.1 Water**

Adequate provision of water will be a prerequisite for the development. Four options will be considered, in order of priority by the Developer:

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

The estimated maximum amount of water required during construction is 34 100kl. The estimated maximum amount of water required during the operational phase is 9 547 kl per annum.

### **2.5.2 Stormwater**

The need for stormwater management and mitigation measures will be considered by a stormwater specialist and any recommendations/management plans included in the Environmental Management Programme (EMPr) to be submitted as part of the EIR.

### **2.5.3 Sanitation**

During construction phase, portable chemical toilets will be utilised, that will be serviced privately or by the local municipality. Wastewater will be disposed of at a licensed landfill site. Should the contractor decide to install a conservancy tanks/s, this will be done in accordance with the NWA.

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

### **2.5.4 Solid Waste**

During the construction phase, solid waste will mainly be in the form of construction material, excavated substrate and domestic solid waste. All waste will be disposed of in scavenger proof

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

During the operational phase household waste will be removed to a licensed landfill site by a private contractor or by the local municipality.

#### **2.5.5 Electricity**

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

During operation, the electricity will be supplied by the plant.

## 2.6 DECOMMISSIONING OF THE FACILITY

The operating period will be 20-25 years from the commencement date of the operation phase. It is anticipated that new PV technologies and equipment will be implemented, within the scope of the Environmental Authorisation, when influencing the profitability of the solar facility.

A likely extension of the plant's lifetime would involve putting new, more efficient, solar panels on the existing structures to improve the efficiency of the facility as the technology improves. The specifications of these new panels will be the same as the current panels under consideration, but the conversion efficiency of sunlight to energy will be greater (comparable to new computer chips, that are the same, but faster and more efficient). If, for whatever reason the plant halts operations, the Environmental Authorisation and contract with the landowner will be respected during the decommissioning phase.

The decommissioning process will consist of the following steps:

- The PV facility would be disconnected from the Eskom grid.
- The BESS, inverters and PV modules would be disconnected and disassembled.
- Concrete foundations (if used) would be removed, and the structures would be dismantled.
- Wastewater storage conservancy tank would be responsibly removed, and area would be rehabilitated.
- The underground cables would be unearthed and removed, and buildings would be demolished and removed.
- The fencing would be dismantled and removed.
- The roads can be retained should the landowner choose to retain them, alternatively the roads will be removed, and the compaction will be reversed.
- Most of the wires, steel and PV modules are recyclable and would be recycled to a reasonable extent. The Silicon and Aluminium in PV modules can be removed and reused in the production of new modules.
- Any rubble and non-recyclable materials will be disposed of at a registered landfill facility.

The rehabilitation of the site would form part of the decommissioning phase. The aim would be to restore the land to its original form (or as close as possible). The rehabilitation activities would include the following:

- Removal of all structures and rubble;
- Breaking up compaction where required, loosening of the soil and the redistribution of topsoil; and
- Restoration of the surface to the original contours and application of hydro seeding.

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## 3 LEGISLATIVE AND POLICY CONTEXT

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This section aims to address the following requirements of the regulations:

**Appendix 2.** (2) A scoping report (...) must include-

(e) a description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process;

### 3.1 INTRODUCTION

Environmental decision making with regards to solar PV plants is based on numerous policy and legislative documents. These documents inform decisions on project level environmental authorisations issued by the National Department of Forestry, Fisheries and the Environment (DFFE) as well as comments from local and district authorities. Moreover, it is significant to note that they also inform strategic decision making reflected in the IDPs and SDFs. Therefore, to ensure streamlining of environmental authorisations it is imperative for the proposed activity to align with the principles and objectives of key national, provincial and local development policies and legislation. The following acts and policies and their applicability to the proposed development are briefly summarised:

- The Constitution of the Republic of South Africa, 1996 (Act No. 108 of 1996)
- National Environmental Management Act, 1998 (Act No. 107 of 1998) [NEMA]
- The National Energy Act, 2008 (Act 34 of 2008)
- National Water Act, 1998 (Act No. 36 of 1998)
- National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)
- National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)
- The National Heritage Resources Act, 1999 (Act No. 25 of 1999)
- Conservation of Agricultural Resources Act, 1983 (Act No. 85 of 1983)
- The National Forests Act, 1998 (Act 84 of 1998)
- The White Paper on the Energy Policy of the Republic of South Africa (1998)
- The White Paper on Renewable Energy (2003)
- Integrated Resource Plan (IRP) for South Africa (2010-2030)
- National Development Plan of 2030
- National Infrastructure Plan of South Africa (2012)

- New Growth Path Framework (2010)
- Climate Change Bill (2018)
- Climate Change Bill (2021) – for public comment
- Strategic Integrated Projects (SIPs) (2010 – 2030)
- Strategic Environmental Assessment (SEA) for wind and solar PV Energy in South Africa (2014)
- Gauteng Provincial Spatial Development Framework (PSDF) (2012)
- North West Provincial Spatial Development Framework (PSDF) (2016)
- West Rand DM Integrated Development Plan (IDP) 2017 – 2021 (2017)
- Dr Kenneth Kaunda DM Amended Integrated Development Plan (IDP) 2017 – 2022 (2020)
- Merafong City Local Municipality Integrated Development Plan 2020/2021 (2020)
- Merafong City Local Municipality Spatial Development Framework (2017)
- JB Marks Local Municipality Integrated Development Plan 2019/2020 (2020)
- JB Marks Local Municipality Spatial Development Framework (2017)

The key principles and objectives of each of the legislative and policy documents are briefly summarised in Tables 3.1 and 3.2 to provide a reference framework for the implications for the proposed activity.





### 3.2 LEGISLATIVE CONTEXT

**Table 3.1:** Legislative context for the construction of photovoltaic solar plants

LEGISLATION	ADMINISTERING AUTHORITY	DATE	SUMMARY / IMPLICATIONS FOR PROPOSED DEVELOPMENT
<b>The Constitution of South Africa (Act No. 108 of 1996)</b>	National Government	1996	<p>The Constitution is the supreme law of the Republic and all law and conduct must be consistent with the Constitution. The Chapter on the Bill of Rights contains a number of provisions, which are relevant to securing the protection of the environment. Section 24 states that “everyone has the right to (a) an environment that is not harmful to their health or well-being and (b) to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that – (i) prevent pollution and ecological degradation; (ii) promote conservation; and (iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development. The Constitution therefore, compels government to give effect to the people’s environmental right and places government under a legal duty to act as a responsible custodian of the country’s environment. It compels government to pass legislation and use other measures to protect the environment, to prevent pollution and ecological degradation, promote conservation and secure sustainable development.</p> <p>The development of the Carmel Solar 3 PV facility and the aspects related thereto considers the creation of an environment which is not harmful or degraded through the implementation of appropriate mitigation measures.</p>
<b>The National Environmental Management Act (Act No. 107 of 1998)</b>	National Department of Environmental Affairs (now known as the Department of Forestry, Fisheries and the Environment) and the Gauteng Province	1998	<p>NEMA provides for co-operative governance by establishing principles and procedures for decision-makers on matters affecting the environment. An important function of the Act is to serve as an enabling Act for the promulgation of legislation to effectively address integrated environmental management. Some of the principles in the Act are accountability; affordability; cradle to grave management; equity; integration; open information; polluter pays; subsidiary; waste avoidance and minimisation; co-operative governance; sustainable development; and environmental protection and justice.</p>



<p>Department of Economic, Small Business Development, Tourism and Environmental Affairs (DESTEA)</p>	<p>The mandate for EIA lays with the National Environmental Management Act (107 of 1998) and the EIA Regulations No. 324, 325, 326, and 327 promulgated in terms of Section 24 of NEMA. The EIA Regulations determine that an Environmental Authorisation is required for certain listed activities, which might have a detrimental effect on the environment.</p> <p>The EIA process undertaken for the Carmel Solar 3 PV facility is in-line with the requirements of NEMA for the Application for Environmental Authorisation.</p>
<p><b>The National Energy Act (Act No. 34 of 2008)</b></p>	<p>Department of Mineral Resources and Energy 2008</p> <p>One of the objectives of the National Energy Act was to promote diversity of supply of energy and its sources. In this regard, the preamble makes direct reference to renewable resources, including solar: “To ensure that diverse energy resources are available, in sustainable quantities, and at affordable prices, to the South African economy, in support of economic growth and poverty alleviation, taking into account environmental management requirements (...); to provide for (...) increased generation and consumption of renewable energies...” (Preamble).</p> <p>Considering that the Carmel Solar 3 PV facility is proposed to make use of PV technology and the solar resource for the generation of electricity, the proposed project is in-line with the Act.</p>
<p><b>The National Water Act (Act No. 36 of 1998)</b></p>	<p>Department of Water Affairs (now known as Department of Water and Sanitation) 1998</p> <p>Sustainability and equity are identified as central guiding principles in the protection, use, development, conservation, management and control of water resources. The intention of the Act is to promote the equitable access to water and the sustainable use of water, redress past racial and gender discrimination, and facilitate economic and social development. The Act provides the rights of access to basic water supply and sanitation, and environmentally, it provides for the protection of aquatic and associated ecosystems, the reduction and prevention of pollution and degradation of water resources.</p> <p>As this Act is founded on the principle that National Government has overall responsibility for and authority over water resource management, including the equitable allocation and beneficial use of water in the public interest, a person can only be entitled to use water if the use is permissible under the Act. Chapter 4 of the Act lays the basis for regulating water use.</p> <p>Also, should a water use license be required for the project, the National Water Act will be applicable in terms of obtaining the relevant license.</p>



<b>National Environmental Management: Waste Act (Act No. 59 of 2008)</b>	National Department of Environmental Affairs (DEA) (now known as the Department of Forestry, Fisheries and the Environment)	2008	<p>NEMWA has been developed as part of the law reform process enacted through the White Paper on Integrated Pollution and Waste Management and the National Waste Management Strategy (NWMS). The objectives of the Act relate to the provision of measures to protect health, well-being and the environment, to ensure that people are aware of the impact of waste on their health, well-being and the environment, to provide for compliance with the measures, and to give effect to section 24 of the Constitution in order to secure an environment that is not harmful to health and well-being.</p> <p>Regulations No. R921 (of 2013) promulgated in terms of Section 19(1) of the National Environmental Management: Waste Act (59 of 2008) determines that no person may commence, undertake or conduct a waste management activity listed in this schedule unless a license is issued in respect of that activity. It is not envisaged that a waste permit will be required for the proposed development as no listed activities in terms of waste management are expected to be triggered.</p>
<b>National Environment Management: Air Quality Act (Act No. 39 of 2004)</b>	National Department of Environmental Affairs (DEA) (now known as the Department of Forestry, Fisheries and the Environment)	2004	<p>The object of this Act is to protect the environment by providing reasonable measures for the protection and enhancement of the quality of air in the Republic; the prevention of air pollution and ecological degradation; and securing ecologically sustainable development while promoting justifiable economic and social development.</p> <p>Regulations No. R248 (of 31 March 2010) promulgated in terms of Section 21(1)(a) of the National Environmental Management Act: Air Quality Act (39 of 2004) determine that an Atmospheric Emission License (AEL) is required for certain listed activities, which result in atmospheric emissions which have or may have a detrimental effect on the environment. The Regulation also sets out the minimum emission standards for the listed activities. It is not envisaged that an Atmospheric Emission License will be required for the proposed development.</p>
<b>The National Heritage Resources Act</b>	South African Heritage Resources Agency (SAHRA)	1999	<p>The Act aims to introduce an integrated and interactive system for the management of heritage resources, to promote good governance at all levels, and empower civil society to nurture and conserve heritage resources so that they may be bequeathed to future generations and to lay down principles for governing heritage resources management throughout the Republic. It also aims to establish the South African Heritage Resources Agency together with its Council to co-</p>



<p><b>(Act No. 25 of 1999)</b></p>		<p>ordinate and promote the management of heritage resources, to set norms and maintain essential national standards and to protect heritage resources, to provide for the protection and management of conservation-worthy places and areas by local authorities, and to provide for matters connected therewith.</p> <p>The Act protects and manages certain categories of heritage resources in South Africa. For the purposes of the Heritage Resources Act, a “heritage resource” includes any place or object of cultural significance. In this regard the Act makes provision for a person undertaking an activity listed in Section 28 of the Act to notify the resources authority. The resources authority may request that a heritage impact assessment be conducted if there is reason to believe that heritage resources will be affected.</p> <p>A case file has been opened on SAHRIS for the Carmel Solar 3 PV facility with case reference number 20162, and all relevant documents were submitted for their comments and approval. The Heritage Impact Assessment undertaken for the solar PV facility is included as Appendix E6, and the Palaeontological Impact Assessment is included as Appendix E7.</p>
<p><b>Conservation of Agricultural Resources Act (Act No. 85 of 1983)</b></p>	<p>National and Provincial Government 1983</p>	<p>The objective of the Act is to provide control over the utilisation of the natural agricultural resources of the Republic in order to promote the conservation of the soil, the water sources and the vegetation and the combating of weeds and invader plants; and for matters connected therewith.</p> <p>Consent will be required from the Department of Agriculture, Forestry and Fisheries (now known as the Department of Forestry, Fisheries and the Environment) in order to confirm that the proposed development is not located on high potential agricultural land and to approve the long-term lease agreement.</p> <p>An Agricultural Compliance statement has been undertaken for the Carmel Solar 3 PV facility and is included as Appendix E5.</p>
<p><b>The National Forests Act, 1998 (Act 84 of 1998)</b></p>	<p>Department of Environmental Affairs (now known as the Department of</p>	<p>The purposes of this Act are to:</p> <ul style="list-style-type: none"> <li>(a) promote the sustainable management and development of forests for the benefit of all;</li> <li>(b) create the conditions necessary to restructure forestry in State forests;</li> </ul>



Forestry, Fisheries  
and the  
Environment)

- (c) provide special measures for the protection of certain forests and trees;
- (d) promote the sustainable use of forests for environmental, economic, educational, recreational, cultural, health and spiritual purposes.
- (e) promote community forestry;
- (f) promote greater participation in all aspects of forestry and the forest products industry by persons disadvantaged by unfair discrimination.

Section 12(1) read with s15(1) of the NFA stated that the Minister may declare a particular tree, group of trees, woodland; or trees belonging to a particular species, to be a protected tree, group of trees, woodland or species. A list of protected tree species was gazetted in GN 635 of 6 December 2019. The effect of the declaration is that no person may (a) cut, disturb, damage or destroy; or (b) possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, or any forest product derived from a protected tree, except under a license granted by the Minister; or in terms of an exemption published by the Minister in the Gazette.

A Terrestrial Biodiversity Impact Assessment has been undertaken for the Carmel Solar 3 PV facility and is included in Appendix E2.



### 3.3 POLICY CONTEXT

**Table 3.2:** Policy context for the construction of photovoltaic solar plants

POLICY	ADMINISTERING AUTHORITY	DATE	SUMMARY / IMPLICATIONS FOR PROPOSED DEVELOPMENT
<b>The White Paper on the Energy Policy of the Republic of South Africa</b>	Department of Mineral Resources and Energy	1998	<p>The White Paper on the Energy Policy of the Republic of South Africa establishes the international and national policy context for the energy sector, and identifies the following energy policy objectives:</p> <ul style="list-style-type: none"> <li>• Increasing access to affordable energy services</li> <li>• Improving energy governance</li> <li>• Stimulating economic development</li> <li>• Managing energy-related environmental and health impacts</li> <li>• Securing supply through diversity</li> <li>• Energy policy priorities</li> </ul> <p>The White Paper sets out the advantages of renewable energy and states that Government believes that renewables can in many cases provide the least cost energy service, particularly when social and environmental costs are included. The White Paper acknowledges that South Africa has neglected the development and implementation of renewable energy applications, despite the fact that the country’s renewable energy resource base is extensive, and many appropriate applications exist.</p> <p>The White Paper notes that renewable energy applications have specific characteristics that need to be considered. Advantages include:</p> <ul style="list-style-type: none"> <li>• Minimal environmental impacts in operation in comparison with traditional supply technologies; and</li> <li>• Generally lower running costs, and high labour intensities.</li> </ul> <p>Disadvantages include:</p> <ul style="list-style-type: none"> <li>• Higher capital costs in some cases;</li> <li>• Lower energy densities; and</li> </ul>



- Lower levels of availability, depending on specific conditions, especially with sun and wind-based systems.

The Carmel Solar 3 PV facility is in line with this policy as it proposes the generation of renewable energy from the solar resource.

<b>The White Paper on Renewable Energy</b>	Department of Mineral Resources and Energy	of 2003	This White Paper on Renewable Energy supplements the <i>White Paper on Energy Policy</i> , which recognises that the medium and long-term potential of renewable energy is significant. This Paper sets out Government’s vision, policy principles, strategic goals and objectives for promoting and implementing renewable energy in South Africa.
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The White Paper notes that while South Africa is well-endowed with renewable energy resources that have the potential to become sustainable alternatives to fossil fuels, these have thus far remained largely untapped. Government’s long-term goal is the establishment of a renewable energy industry producing modern energy carriers that will offer in future years a sustainable, fully non-subsidised alternative to fossil fuels. The medium-term (10-year) target set in the White Paper is: *10 000 GWh (0.8 Mtoe) renewable energy contribution to final energy consumption by 2013, to be produced mainly from biomass, wind, solar and small-scale hydro. The renewable energy is to be utilised for power generation and non-electric technologies such as solar water heating and bio-fuels. This is approximately 4% (1667 MW) of the projected electricity demand for 2013 (41539 MW)* (Executive Summary, ix).

The Carmel Solar 3 PV facility is in line with this paper as it proposes the generation of renewable energy from the solar resource.

<b>Integrated Resource Plan (IRP) for South Africa</b>	Department of Mineral Resources and Energy	of 2010-2030	The Integrated Resource Plan for Electricity for South Africa of 2010–2030 (further referred to as the IRP) is a “living plan” which is expected to be revised and updated continuously as necessary due to changing circumstances. According to the Summary of the plan the current IRP for South Africa, which was originally initiated by the Department of Energy (DoE) in June 2010 (the Department is now known as Department of Mineral Resources and Energy), led to the Revised Balanced Scenarios (RBS) for the period 2010–2030.
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*“This scenario was derived based on the cost-optimal solution for new build options (considering the direct costs of new build power plants), which was then “balanced” in accordance with qualitative measures such as local job creation”.* In addition to all existing and committed power plants, the RBS included 11,4 GW of



renewables, which relates to the proposed Carmel Solar 3 PV facility. In 2010 several changes were made to the IRP model. The main changes in the IRP were the disaggregation of renewable energy technologies to explicitly display solar photovoltaic (PV), concentrated solar power (CSP), and wind options (RSA, 2011a).

The summary of the IRP further explains that traditional cost-optimal scenarios were developed based on the previously mentioned changes in the IRP. This resulted in the Policy-Adjusted IRP, which stated that:

*“The installation of renewables (solar PV, CSP and wind) have been brought forward in order to accelerate a local industry; To account for the uncertainties associated with the costs of renewables and fuels, a nuclear fleet of 9,6 GW is included in the IRP; The emission constraint of the RBS (275 million tons of carbon dioxide per year after 2024) is maintained; and Energy efficiency demand-side management (EEDSM) measures are maintained at the level of the RBS” (RSA, 2011a:6).*

*“The Policy-Adjusted IRP includes the same amount of coal and nuclear new builds as the RBS, while reflecting recent developments with respect to prices for renewables. In addition to all existing and committed power plants (including 10 GW committed coal), the plan includes 9,6 GW of nuclear; 6,3 GW of coal; 17,8 GW of renewables; and 8,9 GW of other generation sources” (RSA, 2011a:6).*

The IRP highlights the commitments before the next IRP. The commitments pertaining to the purpose of the proposed project in renewable energy is: *“Solar PV programme 2012-2015: In order to facilitate the connection of the first solar PV units to the grid in 2012 a firm commitment to this capacity is necessary. Furthermore, to provide the security of investment to ramp up a sustainable local industry cluster, the first four years from 2012 to 2015 require firm commitment.”*

*“Solar PV 2016 to 2019: As with wind, grid upgrades might become necessary for the second round of solar PV installations from 2016 to 2019, depending on their location. To trigger the associated tasks in a timely manner, a firm commitment to these capacities is necessary in the next round of the IRP at the latest. By then, the assumed cost decreases for solar PV will be confirmed” (IRP, 2011a:17).*

In conclusion the IRP recommends that an accelerated roll-out in renewable energy options should be allowed with regards to the benefits of the localization in renewable energy technologies (RSA, 2011a). It is however important to take note that since the release of the IRP in 2011 there has been a number of developments in the energy sector of South Africa. Therefore, the IRP was updated and was open for





comments until March of 2017. The new IRP of 2019 was formally published in October 2019. For the revision scenario, analysis was conducted. The results revealed that for the period ending 2030 that: *“The committed Renewable Energy Independent Power Producers Programme, including the 27 signed projects and Eskom capacity rollout ending with the last unit of Kusile in 2022, will provide more than sufficient capacity to cover the projected demand and decommissioning of plants up to approximately 2025”*; *“Imposing annual build limits on renewable energy will not affect the total cumulative capacity and the energy mix for the period up to 2030”*; and *“the scenario without renewable energy annual build limits provides the least-cost option by 2030”* (RSA, 2018:34).

Lastly, the draft IRP of 2018 also included the scenario analysis for the period post 2030. Here it was observed that: *“Imposing annual build limits on renewable energy will restrict the cumulative renewable installed capacity and the energy mix for this period; adopting no annual build limits on renewables or imposing a more stringent strategy to reduce greenhouse gas emissions implies that no new coal power plants will be built in the future unless affordable cleaner forms of coal-to-power are available; and the scenario without renewable energy annual build limits provides the least-cost option by 2050”* (RSA, 2018:34–35).

In the final IRP of 2019 key considerations were taken into account together with required actions to be taken for the IRP of 2019 to be credible. In terms of renewable energy technologies like solar and wind, the IRP stated that *“The application of renewable build limits ‘smoothes out’ the capacity allocations for wind and solar PV which provides a constant pipeline of projects to investment; this addresses investor confidence”*. The decision stated against this key consideration is to *“retain the current annual build limits on renewables (wind and PV) pending the finalization of a just transition plan”* (RSA, 2019:46). Hereby the IRP also recognises renewable technologies’ potential to diversify the electricity mix, create new industries and job opportunities and localize across the value chain (RSA, 2019:13).

The Carmel Solar 3 PV facility is in line with this plan as it proposes the generation of renewable energy from the solar resource and will contribute to the energy mix of the country as set out in this plan.



<b>National Development Plan of 2030</b>	The Presidency: - National Planning Commission	<p>The National Development Plan aims to “eliminate poverty and reduce inequality by 2030” (RSA, undated). In order to eliminate or reduce inequality, the economy of South Africa needs to grow faster in order to benefit all South Africans. In May 2010 a draft national development plan was drafted, which highlighted the nine (9) key challenges for South Africa. The highest priority areas according to the plan are considered to be the creation of employment opportunities and to improve the quality of national education. In this regard, the plan sets out three (3) priority areas, namely, to raise employment by a faster growing economy, improve the quality of education, and to build the capability of the state in order to play a more developmental and transformative role. One of the key challenges identified was that the economy is unsustainably resource intensive and the acceleration and expansion of renewable energy was identified as a key intervention strategy to address this challenge.</p> <p>The development of the Carmel Solar 3 PV facility will contribute to the intervention strategy as identified within the plan.</p>
<b>National Infrastructure Plan of South Africa</b>	Presidential Infrastructure Coordinating Commission 2012	<p>In the year 2012 the South African Government adopted a National Infrastructure Plan (hereafter referred to as the Plan). The aim of this Plan is to transform the economic landscape, while strengthening the delivery of basic services and creating new employment opportunities. This Plan also supports the integration of African communities, and also sets out the challenges and enablers that our country needs in order to respond to the planning and development of infrastructure with regards to fostering economic growth (RSA, 2012). The Plan has developed eighteen (18) strategic integrated projects (further referred to as SIPs). These SIPs stretch over all nine (9) provinces, covering social and economic infrastructure, and projects that enhances development and growth. Of the eighteen (18), five (5) are geographically focused, three (3) spatial, three (3) energy, three (3) social infrastructure, two (2) knowledge, one (1) regional integration, and one (1) water and sanitation focussed. The three (3) SIPs according to the Plan, which are energy focused and correlate to the proposed project are as follow:</p> <ul style="list-style-type: none"> <li>- SIP 8: Green energy in support of the South African economy;</li> <li>- SIP 9: Electricity generation to support socio-economic development; and</li> <li>- SIP 10: Electricity transmission and distribution for all.</li> </ul> <p>SIP 8 according to the Plan “support sustainable green energy initiatives on a national scale through a diverse range of clean energy options as envisaged in the IRP 2010 and support bio-fuel production</p>



*facilities". The purpose of SIP 9 according to the Plan is to "accelerate the construction of new electricity generation capacity in accordance with the IRP 2010 to meet the needs of the economy and address historical imbalances". SIP 9 should also monitor the implementation of major projects such as new power stations like Medupi, Kusile and Ingula. Lastly, SIP 10 aims to "expand the transmission and distribution network to address historical imbalances, provide access to electricity for all and support economic development" (RSA, 2012:20).*

The Carmel Solar 3 PV facility is in line with this plan as it proposes the generation of renewable energy from the solar resource which supports socio-economic development and will contribute to meeting the electricity demand of the country as set out in this plan.

**New Growth Path Framework** Department of Economic Development -

The New Growth Path was developed after 16 years of South Africa's democracy, to respond to emerging opportunities and risks while building on policies. This framework provides a dynamic vision on how to collectively achieve a more developed, equitable and democratic society and economy. This framework mainly reflects the commitment of the South African Government to create employment opportunities for its people in all economic policies (RSA, 2011b).

This framework sets out the markers for job creation and growth and also identify where there are viable changes in the character and structure of production, in order to create a more inclusive, greener economy in the long-term. It is stated in the framework that in order for this framework to reach its objectives, the Government is committed to:

- Identify the possible areas of employment creation; and
- Develop a policy to facilitate employment creation especially with regards to social equity, sustainable employment and growth in the creation of employment activities (RSA, 2011b).

This framework also identifies investments in five key areas, one of which is energy. This framework also states that the green economy is a priority area, which includes the construction of and investment in renewable energy technologies like solar (RSA, 2011b). In this regard it will also assist creating employment opportunities over the medium- and long-term.



Considering that the construction of and investment in renewable energy is a key area identified within the framework, the Carmel Solar 3 PV facility is considered to be in-line with the framework.

<b>Climate Change Bill</b>	National Department of Environmental Affairs (now known as the Department of Forestry, Fisheries and the Environment)	2018	<p>On 08 June 2018 the Minister of Environmental Affairs published the Climate Change Bill (“the Bill”) for public comment. The Bill provides a framework for climate change regulation in South Africa aimed at governing South Africa’s sustainable transition to a climate resilient, low carbon economy and society. The Bill provides a procedural outline that will be developed through the creation of frameworks and plans. The following objectives are set within the Bill:</p> <ul style="list-style-type: none"> <li>• Provide for the coordinated and integrated response to climate change and its impacts by all spheres of government in accordance with the principles of cooperative governance;</li> <li>• Provide for the effective management of inevitable climate change impacts through enhancing adaptive capacity, strengthening resilience and reducing vulnerability to climate change, with a view to building social, economic, and environmental resilience and an adequate national adaptation response in the context of the global climate change response;</li> <li>• Make a fair contribution to the global effort to stabilise greenhouse gas concentrations in the atmosphere at a level that avoids dangerous anthropogenic interference with the climate system within a timeframe and in a manner that enables economic, employment, social and environmental development to proceed in a sustainable manner.</li> </ul> <p>The Carmel Solar 3 PV facility comprises a renewable energy generation facility and would not result in the generation or release of emissions during its operation.</p>
<b>Climate Change Bill</b>	National Department of Forestry, Fisheries and the Environment	2021	<p>The Department of Forestry, Fisheries and the Environment has published a new Climate Change Bill for public comment. The bill notes that climate change represents an urgent threat to human societies and the planet, and requires an effective, progressive and incremental response from both government and citizens.</p> <p>It recognises that South Africa has a global responsibility to reduce greenhouse gasses and that the anticipated impacts arising as a result of climate change have the potential to undermine achieving of the country’s developmental goals.</p>



The main objective of the bill is to enable the development of an effective climate change response and the long-term, just transition to a climate-resilient and lower-carbon economy and society, and to provide for matters connected therewith.

The Carmel Solar 3 PV facility comprises a renewable energy generation facility and would not result in the generation or release of emissions during its operation.

**Strategic  
Integrated  
Projects (SIPs)**

The Presidential  
Infrastructure  
Coordinating  
Committee  
2010 -  
2030

The Presidential Infrastructure Coordinating Committee (PICC) is integrating and phasing investment plans across 18 Strategic Infrastructure Projects (SIPs) which have five core functions: to unlock opportunity, transform the economic landscape, create new jobs, strengthen the delivery of basic services and support the integration of African economies. A balanced approach is being fostered through greening of the economy, boosting energy security, promoting integrated municipal infrastructure investment, facilitating integrated urban development, accelerating skills development, investing in rural development and enabling regional integration. SIP 8 and 9 of the energy SIPs supports the development of the solar energy facility:

- SIP 8: Green energy in support of the South African economy: Support sustainable green energy initiatives on a national scale through a diverse range of clean energy options as envisaged in the Integrated Resource Plan (IRP 2010 – 2030) and supports bio-fuel production facilities.
- SIP 9: Electricity generation to support socio-economic development: The proposed Carmel Solar 3 PV facility is a potential SIP 9 Project as electricity will be generated and social and economic upliftment, development and growth will take place within the surrounding communities. It would become a SIP 9 project if selected as a Preferred Bidder project by the Department of Mineral Resources and Energy. SIP 9 supports the acceleration of the construction of new electricity generation capacity in accordance with the IRP 2010 to meet the needs of the economy and address historical imbalances.

The Carmel Solar 3 PV facility could be registered as a SIP project once selected as a preferred bidder under the REIPPP Programme. The project would then contribute to the above-mentioned SIPs



<p><b>Strategic Environmental Assessment (SEA) for wind and solar PV Energy in South Africa</b></p>	<p>National Department of Environmental Affairs (now known as the Department of Forestry, Fisheries and the Environment)</p>	<p>2014</p>	<p>The then Department of Forestry, Fisheries and the Environment (DFFE) has committed to contribute to the implementation of the National Development Plan and National Infrastructure Plan by undertaking Strategic Environmental Assessments (SEAs) to identify adaptive processes that integrate the regulatory environmental requirements for Strategic Integrated Projects (SIPs) while safeguarding the environment. The wind and solar photovoltaic (PV) SEA were accordingly commissioned by DEA in support of SIP 8, which aims to facilitate the implementation of sustainable green energy initiatives.</p> <p>This SEA identifies areas where large scale wind and solar PV energy facilities can be developed in terms of SIP 8 and in a manner that limits significant negative impacts on the environment, while yielding the highest possible socio-economic benefits to the country. These areas are referred to as Renewable Energy Development Zones (REDZs).</p> <p>The REDZs also provide priority areas for investment into the electricity grid. Currently one of the greatest challenges to renewable energy development in South Africa is the saturation of existing grid infrastructure and the difficulties in expanding the grid. Proactive investment in grid infrastructure is likely to be the most important factor determining the success of REDZs. Although it is intended for the SEA to facilitate proactive grid investment in REDZs, such investment should not be limited to these areas. Suitable wind and solar PV development should still be promoted across the country and any proposed development must be evaluated on its own merit.</p> <p>The Carmel Solar 3 PV facility is not located within a REDZ, but the development will contribute to the expansion of renewable energy facilities and infrastructure within the country, and provide the positive opportunities associated with it.</p>
<p><b>Gauteng Provincial Spatial Development Framework (PSDF) (2012)</b></p>	<p>Gauteng Provincial Government</p>	<p>2012</p>	<p>The Gauteng Spatial Development Framework has a number of aspects that need to be taken into account when developing the SDF. In particular, this framework is, <i>“premised on building Gauteng as a City Region that allows agriculture to provide a link between rural and urban economic development, shaped by infrastructure led investment”</i>. The framework seeks to:</p> <ul style="list-style-type: none"> <li>○ Provide a clear future provincial spatial structure that is robust to accommodate growth and sustainability.</li> </ul>



- Specify a clear set of spatial objectives for municipalities to achieve in order to ensure realisation of the future provincial spatial structure.
- Propose a set of plans that municipalities have to prepare in their pursuit of these objectives.
- Provide a common language and set of shared planning constructs for municipalities
- to use in their planning processes and plans.
- Enable and direct growth.

In the Gauteng Spatial Development Framework (GSDF), the province outlines issues of population growth with a predicted population of 28 million people in the Gauteng City Region (GCR) by 2055 and therefore Gauteng requires a serious overhaul of its planning fundamentals to address the social, environmental and economic needs of an added 16 million people in the Gauteng province. The GSDF has mentioned that there are too many inadequacies and inequalities that exist in the present Gauteng economic system, and these are in many respects deeply embedded in failings in the spatial structure of the city region.

In addition to the GSDF there are various policies and strategies that have been developed that provide direction to municipalities with regard to the type of developments to promote in the area. Some of these documents included the Integrated Energy Strategy, Green Economy Strategy, ICT Strategy and the Innovation Strategy. Although these strategies do not directly impact on the spatial development of the regions, it does provide some guidance with regard to the types of activities to be promoted. These strategies promote manufacturing related to the green economy, better use of broadband and fibre optic infrastructure that may facilitate developments such as BPO parks.

The development of the Carmel Solar 3 PV facility is in-line with the framework based on the contributions and opportunities presented by a development of this nature.

**North West  
Provincial  
Spatial  
Development  
Framework  
(PSDF) (2016)**

North West 2016  
Provincial  
Government

The North West PSDF is a policy document that promotes a ‘developmental state’ in accordance with national and provincial legislation and directives. It aligns with the North West Provincial Growth and Development Strategy which has committed the North West to ‘building a prosperous, sustainable and growing provincial economy which reduces poverty and improves social development’.



The PSDF includes comprehensive plans and strategies that collectively indicate which type of land-use should be promoted in the province, where such land-use should take place, and how it should be implemented and managed. In broad terms, the PSDF:

- Adopt a holistic approach to spatial development in order to minimise the long-term negative impacts of current land use or development decisions.
- Ensure that spatial planning serves national, provincial and/or local interest.
- Support the long-term adequacy or availability of physical, social and economic resources to support or carry development.
- Protect existing natural, environmental, and cultural resources.
- Ensure that land which is currently in agricultural use would only be reallocated to other uses where real need exists, and prime agricultural land should remain in production.
- Support mining as a vital economic driver in the province without jeopardizing the biodiversity value of the environment.
- Adopt a climate change strategy that will provide for responsible actions to curb the effect of global warming and climate change.

The Spatial Challenges and Opportunities provide the crucial components that underlie sustainable development, i.e., need for basic infrastructure and development for the poor, economic growth and development, environmental conservation, and improved livelihoods. These spatial development priorities form the basis for guiding specific decisions regarding the desired spatial development and arrangement of broad land uses within North West and investment and development spending.

The PSDF provides a Spatial Framework and Development Strategies that will manage future growth and associated change in a way that protects and enhance the use of natural resources, biodiversity, and lifestyle values. This requires a highly sustainable pattern of development based on the efficient utilisation of land and infrastructure, supported by management decisions over ad hoc and dispersed forms of development.

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The PSDF builds upon achievements and learns from mistakes of the past, reacts to the challenges of our time, incorporates the traditional knowledge of the people of the North West, and builds upon international best-practice and technology.

The development of the Carmel Solar 3 PV facility is in-line with the framework based on the contributions and opportunities presented by a development of this nature.

**West Rand District Municipality Integrated Development Plan (IDP) 2017 – 2021 (2017)**

West Rand District Municipality

2017

The long-term vision of the West Rand District Municipality (WRDM) is to: *“Integrating District Governance to achieve a better life for all”*.

The above stated vision defines what WRDM would like to attain over medium to long-term, and for that achievement to effectively materialize, their mission is: *“to provide an integrated and excellent developmental district governance system in the West Rand”*.

The core values for the DM are set to be the following:

- Service excellence;
- Pride;
- Integrity;
- Responsibility;
- Transparency;
- Accountability;
- Innovation; and
- Teamwork

The West Rand District Municipality lies to the west of Johannesburg, about 50 minutes from OR Tambo International Airport. It borders the North West Province and accessibility is easy from all major Gauteng centres. This region is a great base from which to explore this fascinating and ancient part of South Africa. The West Rand Region has a rich and diverse landscape with the lovely Magaliesberg Mountains forming the backdrop. Towns in the region include Krugersdorp, Randfontein; Westonaria and Carletonville.



				<p>The development of the Carmel Solar 3 PV facility will contribute to the goals of the area, albeit to a limited extent.</p>
<p><b>Dr Kenneth Kaunda District Municipality Amended Integrated Development Plan (IDP) 2017 – 2022 (2020)</b></p>	<p>Dr. Kenneth Kaunda District Municipality</p>	<p>2020</p>	<p>The long-term vision of the Dr Kenneth Kaunda DM is: <i>“Exploring prosperity through sustainable service delivery for all”</i>.</p> <p>The above stated vision defines what the Dr Kenneth Kaunda District Municipality would like to attain over medium to long-term, and for that achievement to effectively materialize, their mission is that: <i>“To provide an integrated district management framework in support of quality service delivery”</i>.</p> <p>The Key Performance Areas Identified for the municipality is:</p> <ul style="list-style-type: none"> <li>○ Basic Service Delivery and Infrastructure Development</li> <li>○ Municipal Institutional Development Transformation</li> <li>○ District Economic Development</li> <li>○ Financial viability and management</li> <li>○ Good Governance and Public Participation</li> <li>○ Spatial Rationale</li> </ul> <p>The development of the Carmel Solar 3 PV facility will contribute to the goals of the area, albeit to a limited extent.</p>	
<p><b>Merafong City Local Municipality Integrated Development Plan (IDP)</b></p>	<p>Merafong City Local Municipality</p>	<p>2020/21</p>	<p>A strategic session was held in November 2017 by Management, where the Vision, Mission and Core-Values of the Municipality were reviewed. In February 2018 an all-inclusive session with the Political leadership was held where the Vision, Mission and Values were confirmed as follows.</p> <p>Vision: <i>“A prosperous, Sustainable and Community-oriented City”</i></p> <p>Mission: <i>“To provide quality services to our community through accountable governance”</i></p> <p>Values: <i>“Integrity, Accountable, Committed, Teamwork, Proactive, Service excellence”</i>.</p>	



				<p>The Municipality aims towards building a South Africa that is united, non-racial, non-sexist democratic and prosperous in character. A clarion call by the National democratic revolution that dictates that we should develop concrete programmes to address poverty, to create jobs and grow an inclusive, productive economy to address the persisting problems of unemployment, poverty and inequalities through radical economic transformation.</p> <p>The development of the Carmel Solar 3 PV facility will contribute to the goals of the area, albeit to a limited extent.</p>
<p><b>Merafong City Spatial Development Framework 2019/2020 (SDF) (2017)</b></p>	<p>Merafong City SDF</p>	<p>2019/2020</p>	<p>Spatial Development Frameworks and policies at all spheres of government must address the inclusion of persons and areas that were previously excluded, with an emphasis on informal settlements, former homeland areas and areas characterised by widespread poverty and deprivation.</p> <p>The Merafong City Municipal Spatial Development Framework (MSDF), forms part of a hierarchy of plans feeding into the Integrated Development Plan (IDP). The Spatial Development Framework serves as an input into the IDP and concentrates on the spatial aspects of development planning, whereas the IDP focuses on broader developmental issues. During 2013 the Spatial Planning &amp; Land Use Management Act (Act 16 of 2013) (SPLUMA) was promulgated this legislation puts forward principles to influence spatial planning, land use management and land development. It also provides for national and regional spatial frameworks as well as provincial and municipal frameworks, meaning that a package of plans will be undertaken from national to municipal level to direct spatial planning as well as land use management, while providing for uniform regulation of land use management. The general principles endorsed by this Act is that spatial planning, land use management and land development must promote and enhance five main Development Principles, namely Spatial Justice, Spatial Sustainability; Spatial Efficiency; Spatial Resilience, and Good Administration.</p> <p>The development of the Carmel Solar 3 PV facility will contribute to the goals of the area, albeit to a limited extent.</p>	
<p><b>JB Marks Local Municipality</b></p>	<p>JB Marks Local Municipality</p>	<p>2020</p>	<p>The vision of the JB Marks LM is <i>“A transformed, leading, competitive and preferred world class city.”</i></p>	



**Integrated  
Development  
Plan 2019/2020  
(2020)**

The Mission Statement is to *“Provide quality sustainable services that are responsive to our communities’ needs within a healthy, safe and green environment through good governance.”*

The vision and mission of the municipality have led to the mayoral developmental priorities of the LM. An assessment of the internal and external environment and the feedback from the communities it indicates that for the municipality to improve the lives of our people, the following issues should be prioritised:

- Land and Housing
- Job creation
- Agriculture, Rural and economic development
- Water and sanitation
- Safe community
- Vulnerable groups empowerment
- Energy (electricity)
- Storm water drainage
- Sports and recreation
- Health and welfare
- Environment
- Quality sustainable service delivery

The development of the Carmel Solar 3 PV facility will contribute to the goals of the area, albeit to a limited extent.

**JB Marks Local  
Municipality  
Spatial  
Development  
Framework  
(2017)**

JB Marks Local  
Municipality 2017

Spatial Development Framework can be described as an indicative plan showing the desired patterns of land use, direction of growth, special development areas and conservation-worthy areas. The SDF needs to be informed by the vision of the municipal area, the development objectives, as well as the strategies and outputs identified by the IDP.



The Spatial Planning and Land Use Management Act, 2013 (SPLUM 2013) stipulates the role of a local municipality relating to spatial planning and land use management on the following elements:

- The compilation, approval, and review of integrated development plans.
- The compilation, approval, and review of the components of an integrated development plan prescribed by legislation and falling within the competence of a municipality, including a spatial development framework and a land use scheme; and
- The control and regulation of the use of land within the municipal area where the nature, scale and intensity of the land use does not affect the provincial planning mandate of provincial government or the national interest.

The Spatial Vision of the municipality is: *“To reconstruct the urban and rural framework of JB Marks Local Municipality in order to create an integrated and sustainable city by capitalizing on its strategic location and the inherent economic potential that the area has to offer.”*

The development of the Carmel Solar 3 PV facility will contribute to the goals of the area, albeit to a limited extent.

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### 3.4 OTHER LEGISLATION

Other legislation mainly refers to the following:

- Planning legislation governing the rezoning process and approval of the layout plan.
- Design standards and legislation for services provision such as water, sewerage, electricity, etc.
- Municipal bylaws related to building plans, building regulations, etc.

### 3.5 RELEVANT GUIDANCE

The following guidance was considered in conducting the EIA:

- The Equator principles III (2013)<sup>1</sup>
- World Bank Group Environmental, Health and Safety General Guidelines (EHS Guidelines) (2007)
- Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution (2007)
- International Finance Corporation's Policy on Environmental and Social Sustainability (2012)
- DEA. (2013). Draft National Renewable Energy Guideline. Department of Environmental Affairs, Pretoria, South Africa
- DEA, (2012), Guideline 5 – Final companion to the National Environmental Management Act (NEMA) Environmental Impact Assessment (EIA) Regulations of 2010
- DEA, (2012), Guideline 7 – Public participation in the Environmental Impact Assessment process
- DEA, (2012), Guideline 9 – Need and desirability
- DEA, (2006), Guideline 3 – General guide to the Environmental Impact Assessment Regulations
- DEAT, (2006), Guideline 4 – Public participation in support of the Environmental Impact Assessment Regulations
- DEAT, (2006), Guideline 5 – Assessment of alternatives and impacts in support of the Environmental Impact Assessment Regulations
- BirdLife, (2017). Best Practise Guidelines Birds & Solar Energy: Guidelines for assessing and monitoring the impact of solar power generating facilities on bird in southern Africa.

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<sup>1</sup> Although this report is not written in terms of the Equator Principles (EPs), it fully acknowledges that the EPs will need to be complied with should funding for the project be required.

### 3.6 CONCLUSION

The S&EIR process is being undertaken in accordance with the EIA Regulations (as amended) published in GNR 326, in terms of Section 24(5) and 44 of the NEMA as amended as well as all relevant National legislation, policy documents, national guidelines, the World Bank EHS Guidelines, the IFC Performance Standards, and the Equator Principles.

The legislative and policy context plays an important role in identifying and assessing the potential social impacts associated with the proposed development, as well as an indication of the need and desirability of the proposed development from a national, provincial and local level. For this reason, the proposed development project will be assessed in terms of its fit with the key legislative, policy and planning documents discussed above.

The main findings of the review of the policy documents on all spheres of Government indicated that strong support was given towards renewable energy, specifically PV solar energy and therefore it is concluded that there is support for the development of the Carmel Solar 3 PV facility. The White Paper on the Energy Policy of the Republic of South Africa of 1998 stated that due to the fact that renewable energy resources operate from an unlimited resource base, i.e., the sun, renewable energy can increasingly contribute towards a long-term sustainable energy supply for future generations. This policy further highlights that due to the unlimited resources base of renewable energy in South Africa, renewable energy applications, like PV solar energy and associated infrastructure, are more sustainable in terms of social and environmental costs. The Integrated Resource Planning for Electricity for South Africa of 2010–2030, the National Infrastructure Plan of South Africa and the New Growth Path Framework all support the development of the renewable energy sector. In particular, the IRP also indicated that 43% of the energy generation in South Africa is allocated to renewable energy applications. On a District and Local level limited attention is given explicitly to renewable sources like PV solar energy, however the documents reviewed do make provision for such developments and efficiency in improving the quality of lives in terms of efficient physical infrastructure as well as socio-economic growth. At Provincial, District and Local level the policy documents support the applications of renewables.

The review of the relevant policies and documents related to the energy sector therefore indicate that renewables, like solar energy and the establishment of solar energy facilities and associated infrastructure, are supported on all spheres of Government. The proposed Carmel Solar 3 PV facility is therefore supported by the related policy and planning documents reviewed in this section of the report.

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## 4 THE NEED AND DESIRABILITY

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This section aims to address the following requirements of the regulations:

**Appendix 2.** (2) A scoping report (...) must include – (f) a motivation for the need and desirability of the activity in the context of the preferred location.

### 4.1 THE NEED FOR THE PROPOSED ACTIVITY

The proposed activity is a direct result of the growing demand for electricity and the need for renewable energy in South Africa. According to Eskom, the demand for electricity in South Africa has been growing at approximately 3% per annum. This growing demand, fuelled by increasing economic growth and social development, is placing increasing pressure on South Africa's existing power generation capacity. Coupled with this, is the growing awareness of environmentally responsible development, the impacts of climate change and the need for sustainable development.

Over 90% of South Africa's electricity generation is coal based, the World bank estimates that this results in an annual, per capita carbon emission of ~8.9 tons per person. Based on 2008 fossil-fuel CO<sub>2</sub> emissions statistics released by the Carbon Dioxide Information Analysis Centre, South Africa is the 13th largest carbon dioxide emitting country in the world and the largest emitter in Africa (Boden, et al. 2011). In August 2021 an article confirmed that South Africa is the 12th highest greenhouse gas emitter in the world (source: <https://www.news24.com/fin24/economy/eskom-will-only-able-to-meet-global-air-quality-standards-by-2050-owing-to-financial-woes-20210818>).

The proposed project is intended to form part of the Department of Mineral Resources and Energy's (DMREs) Renewable Energy Independent Power Producer Procurement (REIPPP) Programme or any other appropriate energy generation programmes / opportunities. The REIPPP Programme aims to secure 14 725 Megawatts (MW) of new generation capacity from renewable energy sources, while simultaneously diversifying South Africa's electricity mix. According to the 2021 State of the Nation Address, Government will soon be initiating the procurement of an additional 11 800 MW of power from renewable energy, natural gas, battery storage and coal in line with the Integrated Resource Plan 2019 and fulfilling their commitments under the United Nations Framework Convention on Climate Change and its Paris Agreement which include the reduction of greenhouse gas emissions. Eskom, the largest greenhouse gas emitter of South Africa, has committed in principle to net zero emission by 2050 and to increase its renewable capacity. During the 2022 State of the Nation Address it was indicated that during the past year the government had taken "firm steps" to bring additional generation capacity online as quickly as possible to close the shortfall in terms of electricity. As a result, it was confirmed that several new generation projects will be coming online over the next few years.

Besides capacity additions, several assumptions have changed since the promulgation of IRP 2010–2030. Key assumptions that changed include the electricity demand projection, Eskom's existing plant performance, as well as new technology costs. These changes necessitated the review and update of the IRP which resulted in the draft IRP 2018 as per table 4.1 below:



**Table 4.1: Published Draft IRP 2018 (Approved by Cabinet for Consultation)**

	Coal	Nuclear	Hydro	Storage (Pumped Storage)	PV	Wind	CSP	Gas / Diesel	Other (CoGen, Biomass, Landfill)	Embedded Generation
2018	39 126	1 860	2 196	2 912	1 474	1 980	300	3 830	499	Unknown
2019	2 155					244	300			200
2020	1 433				114	300				200
2021	1 433				300	818				200
2022	711				400					200
2023	500									200
2024	500									200
2025					670	200				200
2026					1 000	1 500		2 250		200
2027					1 000	1 600		1 200		200
2028					1 000	1 600		1 800		200
2029					1 000	1 600		2 850		200
2030			2 500		1 000	1 600				200
<b>TOTAL INSTALLED</b>	<b>33 847</b>	<b>1 860</b>	<b>4 696</b>	<b>2 912</b>	<b>7 958</b>	<b>11 442</b>	<b>600</b>	<b>11 930</b>	<b>499</b>	<b>2600</b>
<b>Installed Capacity Mix (%)</b>	<b>44.6</b>	<b>2.5</b>	<b>6.2</b>	<b>3.8</b>	<b>10.5</b>	<b>15.1</b>	<b>0.9</b>	<b>15.7</b>	<b>0.7</b>	
<div style="display: flex; align-items: center;"> <div style="width: 15px; height: 15px; background-color: #cccccc; margin-right: 5px;"></div> Installed Capacity         </div> <div style="display: flex; align-items: center; margin-top: 5px;"> <div style="width: 15px; height: 15px; background-color: #ffff00; margin-right: 5px;"></div> Committed / Already Contracted Capacity         </div> <div style="display: flex; align-items: center; margin-top: 5px;"> <div style="width: 15px; height: 15px; background-color: #90ee90; margin-right: 5px;"></div> New Additional Capacity (IRP Update)         </div>										

According to the South African Energy Sector Overview (2021), there is currently 1 723MW of installed PV capacity, while an additional 2 600MW and 860MW from wind and solar has been rewarded as part of Bid window 5 and 6, respectively (latter announced in 2022).

## 4.2 THE DESIRABILITY OF THE PROPOSED ACTIVITY

The facility's contribution towards sustainable development and the associated benefits to society in general is discussed below:

- Lesser dependence on fossil fuel generated power - The deployment of the facility will have a positive macro-economic impact by reducing South Africa's dependence on fossil fuel generated power and assisting the country in meeting its growing electricity demand.
- Increased surety of supply - By diversifying the sources of power in the country, the surety of supply will increase. The power demands of South Africa are ever increasing and by adding solar power this demand can be met, even exceeded without increasing pollution in relation to the use of fossil fuels. The project has the potential of "securing" economic activity by assisting in removing supply constraints if Eskom generation activities result in a supply shortfall. When supply is constrained, it represents a limitation to economic growth. When a supply reserve is available, it represents an opportunity for economic growth.
- Local economic growth - The proposed project will contribute to local economic growth by supporting industry development in line with provincial and regional goals and ensuring advanced skills are drawn to the Gauteng and North West Provinces. The project will likely encounter widespread support from government, civil society and businesses, all of whom see potential opportunities for revenues, employment and business opportunities locally. The development of the photovoltaic solar facility will in turn lead to growth in tax revenues for local municipalities and sales of carbon credits, resulting in increased foreign direct investment. The location of the proposed development within the Merafong City Local Municipality is desirable as a large portion of households live within the poverty level (51%) which has an annual income of less than R38 200 (Merafong City IDP, 2020/2021); whilst a large portion of households also live within the poverty level (77.8%) within the JB Marks Local Municipality which has an annual income of less than R38 200.
- Lower costs of alternative energy - An increase in the number of solar facilities commissioned will eventually reduce the cost of the power generated through solar facilities. This will contribute to the country's objective of utilising more renewable energy and less fossil fuel-based power sources. It will assist in achieving the goal to generate 14 725 MW of electricity from renewable energy as per the Renewable Energy Independent Power Producer Procurement (REIPPP) Programme of the Department of Mineral Resources and Energy. The Government will be initiating the procurement of an additional 11 800 MW of renewable energy as stated during the 2021 State of the Nation Address.
- Reduction in greenhouse gas emissions - The additional power supplied through solar energy will reduce the reliance on the combustion of fossil fuels to produce power. The South African electricity grid is predominantly coal-fired and therefore GHG emissions intensive (coal accounts for more than 92% of the fuel used in South Africa's electricity generation). The reduction of GHG emissions as a result of the project implementation will be achieved due to reduction of CO<sub>2</sub> emissions from combustion

of fossil fuel at the existing grid-connected power plants and plants which would likely be built in the absence of the project activity.

- CDM Project - A solar energy facility also qualifies as a Clean Development Mechanism (CDM) project (i.e., a financial mechanism developed to encourage the development of renewable technologies).
- Climate change mitigation - On a global scale, the project makes a contribution to greenhouse gas emission reduction and therefore contributes toward climate change mitigation.
- Reduced environmental impacts - The reduction in non-renewable electricity consumed from the grid will not only result in a reduction in greenhouse gas emissions, but also the prevention of negative impacts associated with coal mining. For example, coal power requires high volumes of water, in areas of South Africa where water supply is already over-stretched and water availability is highly variable. Photovoltaic solar energy technology also does not produce the sulphur emissions, ash or coal mining concerns associated with conventional coal fired electricity generation technologies resulting in a relatively low level of environmental impacts. It is a clean technology which contributes toward a better-quality environment for employees and nearby communities.
- Social benefits - The project activity is likely to have significant long-term, indirect positive social impacts that may extend to a regional and even national scale. The larger scale impacts are to be derived in the utilization of solar power and the experience gained through the construction and operation of the PV facility. In future, this experience can be employed at other similar solar installations in South Africa.
- Provision of job opportunities - The main benefit of the proposed development operating in the area is that local companies or contractors will be hired for the duration of the construction period. The operational phase will provide permanent job opportunities to the local communities from the surrounding area since security guards and general labourers will be required on a full-time basis. Approximately 500 employment opportunities will be created during the construction and operational phases.
- Indirect socio-economic benefits - The increase in the demand for services such as accommodation, transportation, security, general maintenance and catering will generate additional indirect socio-economic benefits for the local community members.
- Effective use of resources - Because of predominantly the climate and soil limitations, the site is totally unsuitable for cultivated crops, and the viable agricultural land use is limited to grazing only. The proposed development in this specific area will generate alternative land use income through rental for the proposed energy facility, which will have a positive impact on agriculture. It will provide the farming enterprise with increased cash flow and rural livelihood, and thereby improve the financial sustainability of agricultural activities.
- Increased access to electricity: The national electricity crises of 2010 and the resultant effects on South African residents and the economy has highlighted how highly reliant

we are on electricity as a source of energy. Government has committed to developing measures to promote energy saving, reduce energy costs to the economy, and reduce the negative impact of energy use on the environment.

- Cumulative impacts of low to medium significance – No cumulative impacts with a high residual risk have been identified. In terms of the desirability of the development of sources of renewable energy therefore, it may be preferable to incur a higher cumulative loss in such a region as this one, than to lose land with a higher environmental value elsewhere in the country.

## 5 DESCRIPTION OF ENVIRONMENTAL ISSUES

This section aims to address the following requirements of the regulations:

**Appendix 2.** (2) A scoping report (...) must include-

(h) a full description of the process followed to reach the proposed preferred activity, site and location of the development footprint within the site, including –

(i) details of all the alternatives considered;

(ii) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;

(iii) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them.

(iv) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;

(ix) the outcome of the site selection matrix;

(x) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such and

(xi) a concluding statement indicating the preferred alternatives, including preferred location of the activity;

### 5.1 CONSIDERATION OF ALTERNATIVES

The DEAT 2006 guidelines on ‘assessment of alternatives and impacts’ proposes the consideration of four types of alternatives namely, the no-go, location, activity, and design alternatives. It is, however, important to note that the regulation and guidelines specifically state that only ‘feasible’ and ‘reasonable’ alternatives should be explored. It also recognizes that the consideration of alternatives is an iterative process of feedback between the developer and EAP, which in some instances culminates in a single preferred project proposal.

The following sections explore different types of alternatives in relation to the proposed activity in more detail.

#### 5.1.1 No-go Alternative

This alternative considers the option of ‘do nothing’ and maintaining the status quo of the affected environment. The description provided in section 5.3 of this report could be considered the baseline conditions (*status quo*) to persist should the no-go alternative be preferred. The site is currently zoned for agricultural and mining land uses. Should the proposed activity not proceed, the site will remain unchanged and will continue to be used for the current land uses present. The area associated with the development footprint has limited agricultural potential and is unsuitable for cultivation, with grazing considered to be the only agricultural option. The potential opportunity costs in terms of alternative land use

income through rental for the energy facility and the supporting social and economic development in the area would be lost if the *status quo* persists.

### **5.1.2 Location Alternatives**

This alternative asks the question, if there is not, from an environmental perspective, a more suitable location for the proposed activity. No other properties have at this stage been secured by Carmel Solar 3 (Pty) Ltd in the Carletonville area to potentially establish the Carmel Solar 3 PV facility. From a local perspective Remaining Extent, Portion 1 and Portion 3 of the Farm Kleinfontein No. 141; Portion 4 of the Farm Turffontein No. 126; and Portions 1, 11, 23 and 28 of the Farm Doornfontein No. 118, is preferred due to its suitable climatic conditions, topography (i.e., in terms of slope), environmental conditions (i.e., low agricultural potential and archaeology), proximity to a grid connection point (i.e., for the purpose of electricity evacuation), as well as site access (i.e., to facilitate the movement of machinery, equipment, infrastructure and people during the construction phase).

Based on the above site-specific attributes, the study area is considered to be highly preferred in terms of the development of a solar PV facility. As such, no property / location alternatives will be considered. Refer to Figure 5.1.



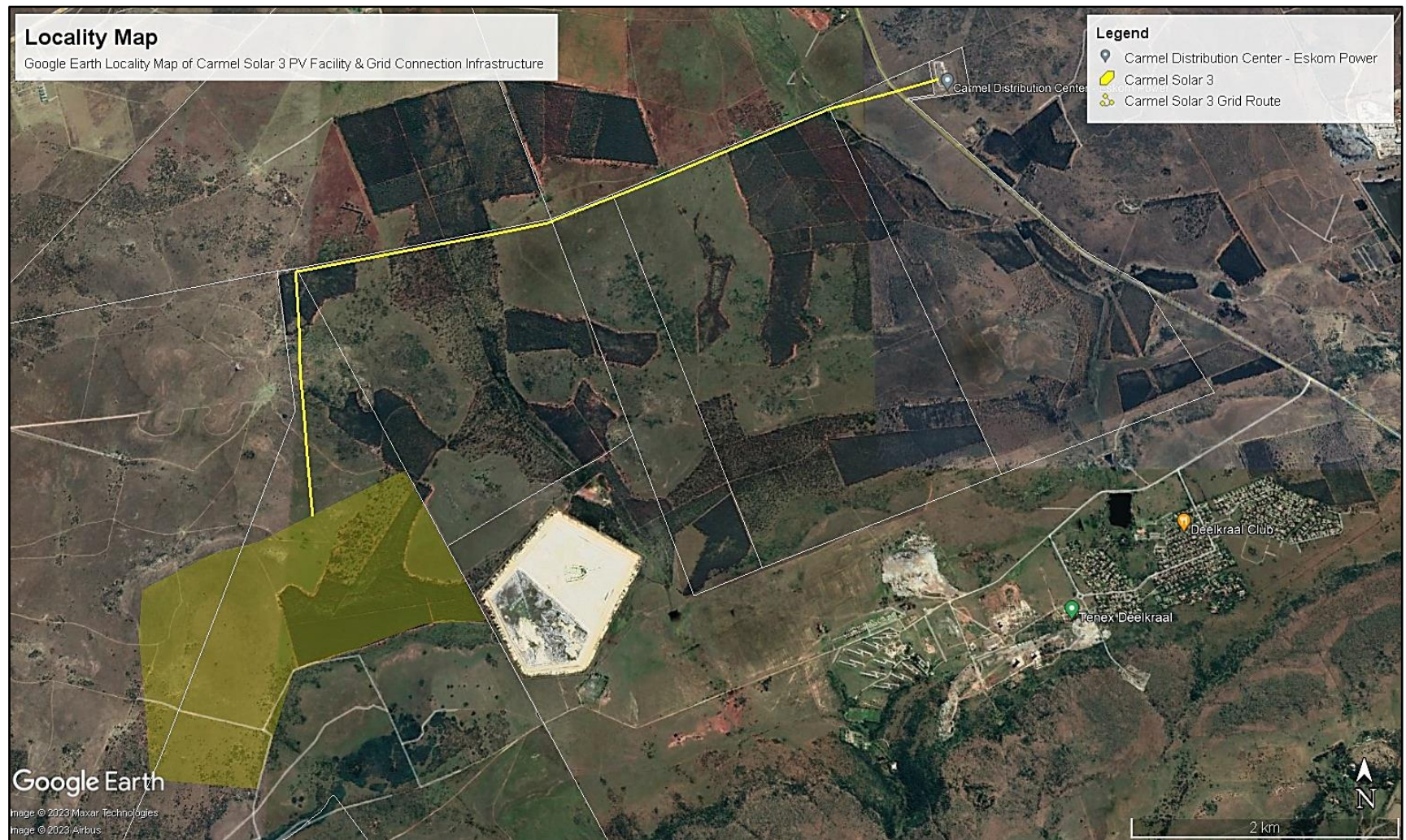


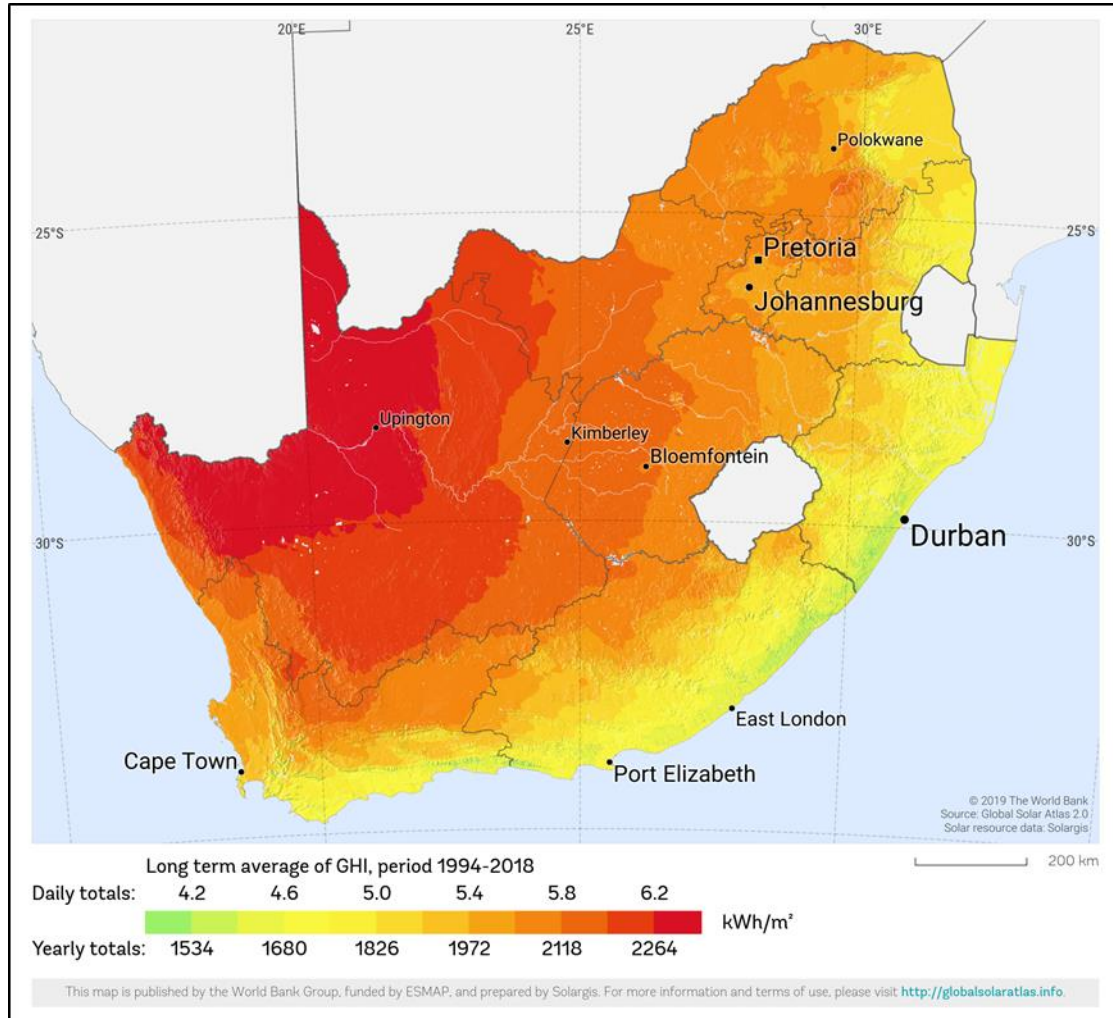
Figure 5.1: Location of the single preferred property alternative

### 5.1.3 Activity Alternatives

The scoping process also needs to consider if the development of a solar PV facility would be the most appropriate land use for the particular site.

- Photovoltaic (PV) solar facility – Carmel Solar 3 (Pty) Ltd is part of a portfolio of solar PV projects throughout South Africa.
- Wind energy facility - Due to the local climatic conditions a wind energy facility is not considered suitable as the area does not have the required wind resource. Furthermore, the applicant has opted for the generation of electricity via solar power rather than the use of wind turbines based on the renewable energy resource available for the area. This alternative is therefore regarded as not feasible and will not be evaluated further in this report.
- Concentrated solar power (CSP) technology - CSP technology requires large volumes of water, and this is a major constraint for this type of technology considering the water challenges and limitation experienced not only in the country but also within the local area. While the irradiation values are high enough to generate sufficient solar power, the water constraints render this alternative not feasible. It must also be noted that the IRP no longer includes the use of CSP as part of the energy mix of the country. Therefore, this alternative will not be considered further in this report.





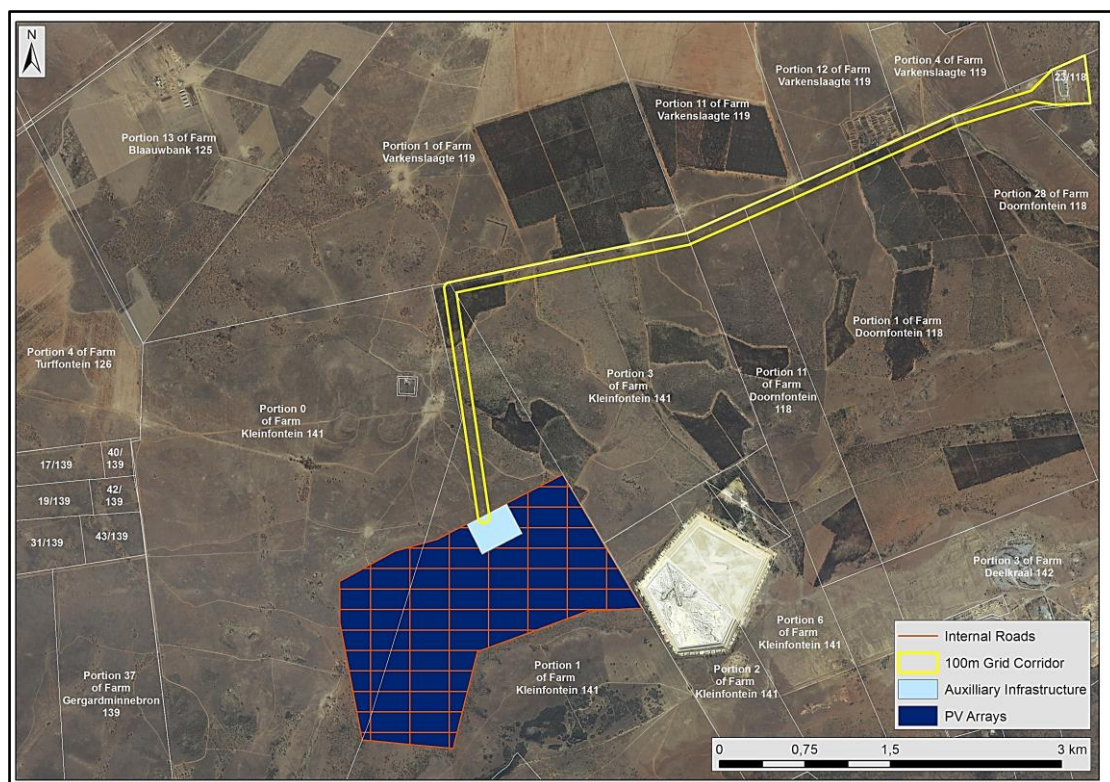
**Figure 5.2:** Global horizontal irradiation values for South Africa (Solar GIS, 2021) and the Carmel Solar 3 PV facility development footprint

#### 5.1.4 Design and Layout Alternatives

Design alternatives were considered throughout the planning and design phase (i.e., what would be the best design option for the development?). In this regard discussions on the design were held between the EAP and the developer, which also included the consideration of technical constraints as a part of the Draft Scoping Report. The draft layout plan is included as Appendix J and in Figure 5.3 below, but it should be noted that the final layout plan will be submitted as part of the EIA Report.

The draft layout considers technical constraints as a part of this scoping process. The limitations of the site and aspects such as environmental sensitive areas (supported by specialist input), areas under cultivation, roads, fencing and servitudes will be further considered and investigated during the EIA phase. The total surface area proposed for layout options include the PV panel arrays spaced to avoid shadowing, access and maintenance roads and associated infrastructure (buildings, power inverters, power lines, BESS and perimeter fences).

An initial site verification assessment (refer to Appendix D) was conducted using the DFFE National web-based screening tool as well as undertaking various specialised assessments on Remaining Extent, Portion 1 and Portion 3 of the Farm Kleinfontein No. 141; Portion 4 of the Farm Turffontein No. 126; and Portions 1, 11, 23 and 28 of the Farm Doornfontein No. 118, and the farm was found favorable due to its close proximity to grid connections, solar radiation, ecology and relatively flat terrain. Where specific features of environmental sensitivity are identified by the independent specialists as part of the Scoping Phase, these areas and the associated required buffers will be considered by the developer during the EIA phase to ensure that the facility layout is appropriate considering the sensitive features present. The site selection also took the site geology, land capability, water availability and land use into consideration before deciding on the specific site within the affected property. Access roads will be required during both the construction and operational phases of the development. Various access points are being considered by the Developer and are highlighted in the Traffic Impact Assessment Report attached as Appendix E. The preferred access route alternative will be presented or will be comparatively assessed during the EIA phase.



**Figure 5.3:** Draft Layout Plan for the Carmel Solar 3 PV Facility and Grid Infrastructure

### 5.1.5 Technology Alternatives

#### **Powerline:**

A 132kV overhead distribution line is the only preferred alternative for the applicant due to the following reasons:

- Overhead Distribution Lines - Overhead lines are less costly to construct than underground lines. Therefore, the preference for overhead lines is mainly based on

cost. Overhead lines allow high voltage operations, and the surrounding air provides the necessary electrical insulation to earth. Further, the surrounding air cools the conductors that produce heat due to lost energy (Swingler et al., 2006).

The overall weather conditions in the Gauteng and North West Provinces are unlikely to cause damage and faults on the proposed overhead distribution power line. Nonetheless, if a fault occurs, it can be found quickly by visual means using a manual line patrol. Repair to overhead lines is relatively simple in most cases and the line can usually be put back into service within a few days. In terms of potential impacts associated with overhead distribution lines these include visual intrusion and threats to sensitive habitat (where applicable).

Furthermore, overhead power lines also provide an opportunity for the avoidance of sensitive environmental features as the overhead lines can span on-ground environmental features to ensure conservation, therefore providing more flexibility in terms of mitigation of the associated on-ground disturbance.

The choice of structure to be used for the powerline will be determined in consultation with Eskom once the Engineers have assessed the geotechnical and topographical conditions and decided on a suitable structure which meets the prescribed technical requirements. The choice of structures to be used will not have any adverse impacts on the environment. The line will be constructed according to the authorised standards for a power line approved by Eskom Holdings SoC Ltd.

The following alternatives may be considered for the overhead powerline:

- Single Circuit Overhead Powerline - The use of single circuit overhead power lines to distribute electricity is considered the most appropriate technology and has been designed over many years for the existing environmental conditions and terrain as specified in the Eskom Specifications and best international practice. Based on all current technologies available, single circuit overhead power lines are considered the most environmentally practicable technology available for the distribution of power. This option is considered appropriate for the following reasons:
  - More cost-effective installation costs;
  - Less environmental damage during installation; and
  - More effective and cheaper maintenance costs over the lifetime of the power line.
- Double Circuit Overhead Power Line - Where sensitive environmental features are identified, and there is sufficient justification, Eskom will consider the use of double circuit (placing 2 power lines on either side of the same tower structure) to minimise impacts. However, the use of double-circuiting has a number of technical disadvantages, which includes faults or problems on one powerline may mean that the other powerline is also disabled during maintenance, and this will affect the quality of supply to an area. Larger and taller towers as well as more towers are required for double-circuit power lines.

The double-circuit overhead powerline proves more feasible since the single circuit may not have the capacity to transmit the large amount of electricity generated from the plant and during maintenance the entire plant would not have to be offline as one

of the double circuit lines would still be able to supply electricity. However, due to the rapid requirement changes, this will only be determined before construction.

- Underground Distribution Lines - Underground cables have generally been used where it is impossible to use overhead lines (for example due to space constraints). Underground cables are oil cooled and are also at risk of groundwater contamination. Maintenance is also difficult on underground lines compared to overhead lines. When a fault occurs in an underground cable circuit, it is almost exclusively a permanent fault due to poor visibility. Underground lines are also more expensive to construct than overhead lines.

***Powerline pylon structure:***

The choice of pylon structure to be used for the power line will be determined in consultation with Eskom and does not significantly affect the environmental impacts of the proposed development as provision has already been made for the visual, ecological and heritage impacts of erecting a power line. No defined structure has been confirmed at this stage and will depend on Eskom's technical requirements. The 132kV line must be constructed according to the authorised standards for a power line approved by Eskom Holdings SoC Ltd. The structure to be utilised for the power line towers will also be informed by the local geotechnical and topographical conditions. The following alternatives are considered with regards to the proposed structures:

- Steel lattice towers - The steel lattice towers provide the following advantages over the other tower types available:
  - Enables multipath earthing which enhances the overall electrical performance of the powerline.
  - Is visually less obtrusive than the mono-pole options.
  - Is more practicable than other options i.e., more cost effective and more practical to construct and maintain.
  - Is safer to work on than the monopole and wood pole structures.
  - Is more durable than the wood pole structures.
- Steel monopoles - The steel monopole is considered less suitable than the steel lattice towers for the following reasons:
  - Is visually more intrusive than the lattice towers.
  - Is more expensive than the lattice towers.
  - Requires more steel than the lattice towers.
  - Is more difficult to erect.
  - Is not as safe to work on as the lattice towers.
- Wood poles - Wood pole structures are only used in extreme circumstances where a visual impact needs to be avoided. Wood pole structures may be cheaper to produce and to construct, but they have one tenth of the lifespan of the metal counterparts and are far more susceptible to weather conditions which makes them less efficient and practicable. The wood pole structure is also more susceptible to having the cross arms burnt off by electrical faults as well as being susceptible to deformation with height.



*Note: It is customary to develop the final/detailed construction layout of the solar PV facility only once an Independent Power Producer (IPP) is awarded a successful bid under the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) or an alternative programme, after which major contracts are negotiated and final equipment suppliers identified.*

*For the purpose of the Environmental Impact Assessment (EIA), site layout alternatives will not be comparatively assessed, but rather a single layout will be refined as additional information becomes available throughout the EIA process (e.g., specialist input, additional site surveys, ongoing stakeholder engagement).*

*The development area presented in the Scoping Report has been selected as a practicable option for the facility, considering technical preference and constraints, as well as initial No-Go layers informed by specialist site surveys.*

*Following further site screening by the specialists (scheduled to take place during the EIA phase), the development footprint will be finalised for impact assessment.*

### **Battery Energy Storage Facility (BESS)**

As technological advances within battery energy storage systems (BESS) are frequent, two BESS technology alternatives are considered:

- Solid state battery electrolytes; and
- Redox-flow technology.

Solid state battery electrolytes, such as lithium-ion (Li-ion), zinc hybrid cathode, sodium ion, flow (e.g., zinc iron or zinc bromine), sodium sulphur (NaS), zinc air and lead acid batteries, can be used for grid applications. Compared to other battery options, Li-ion batteries are highly efficient, have a high energy density and are lightweight. As a result of the declining costs, Li-ion technology now accounts for more than 90% of battery storage additions globally (IRENA, 2019).

Flow batteries use solid electrodes and liquid electrolytes. The most used flow battery is the Vanadium Redox Flow Battery (VRFB), which is a type of rechargeable flow battery that employs vanadium ions in different oxidative states to store chemical potential energy. Considering the nature of the project, only a solid-state technology type would be envisaged for implementation.

### **PV Panels:**

With regards to the structure orientation, the panels will either be fixed to a single-axis horizontal tracking structure where the orientation of the panel varies according to the time of the day, as the sun moves from east to west or tilted at a fixed angle equivalent to the latitude at which the site is located in order to capture the most sun.

There are several types of semiconductor technologies currently available and in use for PV solar panels. Two, however, have become the most widely adopted, namely crystalline silicon and thin film. These technologies are discussed in more detail below:

- Crystalline (high efficiency technology at higher cost):

Crystalline silicon panels are constructed by first putting a single slice of silicon through a series of processing steps, creating one solar cell. These cells are then assembled together in multiples to make a solar panel. Crystalline silicon, also called wafer silicon, is the oldest and the most widely used material in commercial solar panels. Crystalline silicon modules represent 85-90% of the global annual market today. There are two main types of crystalline silicon panels that can be considered for the solar facility:



- Mono-crystalline Silicon - mono-crystalline (also called single crystal) panels use solar cells that are cut from a piece of silicon grown from a single, uniform crystal. Mono-crystalline panels are among the most efficient yet most expensive on the market. They require the highest purity silicon and have the most involved manufacturing process.



- Poly-crystalline Silicon – poly-crystalline panels use solar cells that are cut from multifaceted silicon crystals. They are less uniform in appearance than mono-crystalline cells, resembling pieces of shattered glass. These are the most common solar panels on the market, being less expensive than mono-crystalline silicon. They are also less efficient, though the performance gap has begun to close in recent years (First Solar, 2011).

- Thin film (low-cost technology with lower efficiency):

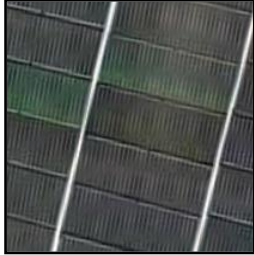
Thin film solar panels are made by placing thin layers of semiconductor material onto various surfaces, usually on glass. The term *thin film* refers to the amount of semiconductor material used. It is applied in a thin film to a surface structure, such as a sheet of glass. Contrary to popular belief, most thin film panels are not flexible. Overall, thin film solar panels offer the lowest manufacturing costs, and are becoming more prevalent in the industry. Thin films currently account for 10-15% of global PV module sales. There are three main types of thin film used:



- Cadmium Telluride (CdTe) - CdTe is a semiconductor compound formed from cadmium and tellurium. CdTe solar panels are manufactured on glass. They are the most common type of thin film solar panel on the market and the most cost-effective to manufacture. CdTe panels perform significantly better in high temperatures and in low-light conditions.



- Amorphous Silicon - Amorphous silicon is the non-crystalline form of silicon and was the first thin film material to yield a commercial product, first used in consumer items such as calculators. It can be deposited in thin layers onto a variety of surfaces and offers lower costs than traditional crystalline silicon, though it is less efficient at converting sunlight into electricity.



- Copper, Indium, Gallium, Selenide (CIGS) - CIGS is a compound semiconductor that can be deposited onto many different materials. CIGS has only recently become available for small commercial applications, and is considered a developing PV technology (First Solar, 2011).

- Bifacial panels:

As the name suggests, bifacial solar panels have two faces, or rather, they can absorb light from both sides of the panel. A lot of potential energy transfer is lost in traditional solar cells when the light hits the back of a solar panel. Most bifacial solar panels use monocrystalline cells, whereas traditional cells use polycrystalline materials. The monocrystalline materials, alongside the clear light pathway on both sides of the panel, enable the light to be absorbed from either side of the cell, and it is thought that the overall efficiency of these cells can be up to 30% greater in commercial applications. Although, the exact amount is variable depending on the surface that they are installed on. The front side of the solar panel still absorbs most of the solar light, but the back side of the solar panel can absorb between 5-90% of the light absorbed by the front of the solar panel. Refer to Figure 5.4.

Traditional solar panels use an opaque back sheet. By comparison, bifacial solar panels either have a clear/reflective back sheet or have dual panes of glass. Most of these solar panels are frameless so any issues with potential-induced degradation (PID) are reduced. To efficiently convert light into electricity from both sides, bifacial solar cells have selective-area metallization schemes that enable light to pass between the metallized areas, rather than the conventional thick metal collectors as seen with monofacial solar panels.

The technology that (at this stage) proves to be most feasible and reasonable with respect to the proposed solar facility is crystalline silicon panels, due to it being non-reflective, more efficient, and with a higher durability. However, due to the rapid technological advances being made in the field of solar technology the exact type of

technology to be used, such as bifacial panels, will only be confirmed at the onset of the project.

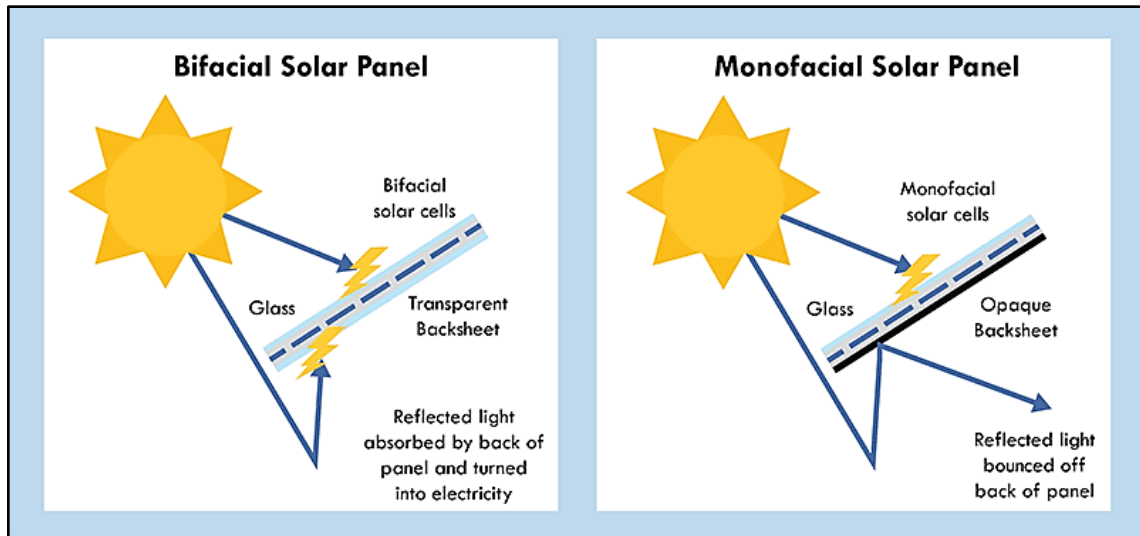


Figure 5.4: Bifacial vs Monofacial Solar Panel absorption



## **5.2 CONCLUDING STATEMENT ON ALTERNATIVES**

The draft layout considers technical constraints as a part of this scoping process. Where specific features of environmental sensitivity are identified by the independent specialists as part of the Scoping Phase, these areas and the associated required buffers will be considered by the developer during the EIA phase to ensure that the facility layout is appropriate considering the sensitive features present. Refer to Figure J for the draft layout proposed for development.

## 5.3 PUBLIC PARTICIPATION PROCESS

The following sections provide detailed information on the public participation process conducted in terms of Regulations 39 to 44.

### 5.3.1 General

The public participation process was conducted strictly in accordance with Regulations 39 to 44. The following three categories of variables were taken into account when deciding the required level of public participation:

- The scale of anticipated impacts;
- The sensitivity of the affected environment and the degree of controversy of the project; and
- The characteristics of the potentially affected parties.

Since the scale of anticipated impacts is low, the general land use of the area is related to mining and agriculture, the limited environmental sensitivity of the site and the fact that no conflict was foreseen between potentially affected parties, no additional public participation mechanisms are considered at this stage of the process. The following actions have already been undertaken:

➤ Site notices

Site notices (size 60 cm x 42 cm) were erected on site on 14 October 2022 informing the public of the commencement of the S&EIR process. Photographic evidence of the site notices is included in Appendix C3.

➤ Newspaper advertisement

Since the proposed development is unlikely to result in any impacts that extend beyond the municipal area where it is located, it was deemed sufficient to advertise in a local newspaper. An advertisement was placed in the Carletonville Herald on 10 November 2022 (see Appendix C2) notifying the public of the EIA process and requesting Interested and Affected Parties (I&APs) to register with, and submit their comments to Environamics Environmental Consultants. I&APs were given the opportunity to raise comments within 30 days of the advertisement.

➤ Background Information Document (BID)

A BID was released to all I&APs including the adjacent landowners, key stakeholders and relevant organs of state on 14 November 2022. The BID provided information on the proposed development, the S&EIA process. I&APs were invited to register onto the project I&AP database.

➤ Direct notification of identified I&APs

Identified I&APs, including key stakeholders representing various sectors, has been directly informed of the EIA process via registered post, telephone calls, WhatsApp's and emails (as relevant). The BID was distributed with the notification. For a complete list of I&APs with their contact details see Appendix C4 to this report.

➤ Direct notification of surrounding landowners and occupiers

Written notices were also provided via registered post, WhatsApp or email (as relevant) to all surrounding landowners and occupiers.

➤ Circulation of Draft Scoping Report

Copies of the draft Scoping report has been provided to all I&APs via courier, Dropbox and/or email (as relevant). Hard copies of the report will be made available on request and where an I&AP does not have the resources to view the report on an online platform.

### **5.3.2 Consultation Process**

Regulation 41 requires that the landowner, surrounding landowners, municipality, relevant ward councillor, any organ of state having jurisdiction in respect of any aspect of the activity should be given written notice of the activity. A complete list of all the consultees who received written notice as well as proof of correspondence is attached as Appendices C4 and C5.

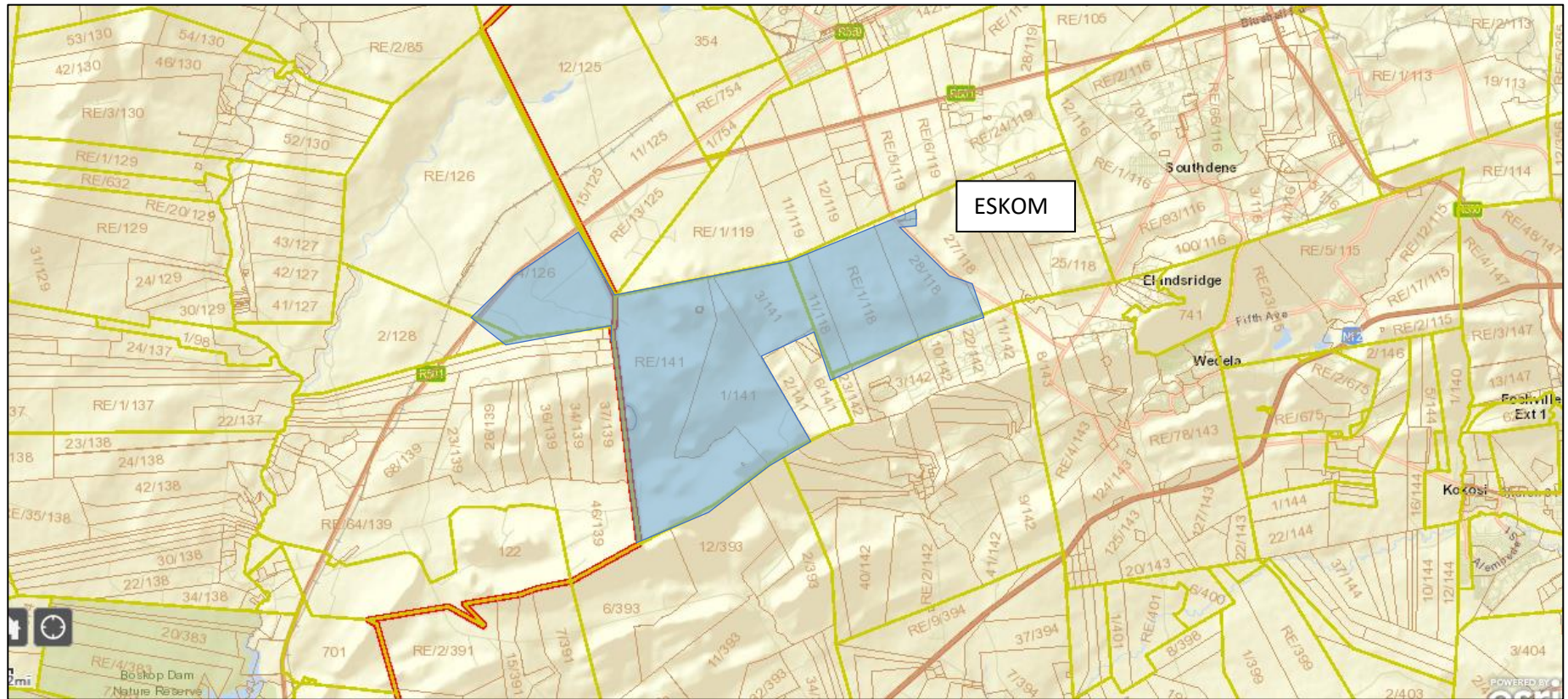


Figure 5.5: Affected properties (Blue) in Relation to Surrounding Properties

### **5.3.3 Registered I&APs**

I&APs include all stakeholders who deem themselves affected by the proposed activity. According to Regulation 43(1) *“A registered interested and affected party is entitled to comment, in writing, on all reports or plans submitted to such party during the public participation process contemplated in these Regulations and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application, provided that the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application.”*

This report is the Draft Scoping Report which has been made available to all potential and/or registered I&APs and State Departments. They have been provided with a copy of the Draft Scoping Report and have been requested to provide written comments on the report within 30 days. All issues identified during this review period will be documented and compiled into a Comments and Response Report to be included as part of the Final Scoping report.

All comments received during the release of the BID for the 30-day review and comment period have been included in this report as Appendix C5, Appendix C6 and Appendix C7 to provide I&APs an opportunity to confirm that their comments raised during the initial public participation phase has been included and considered as part of the EIA process.

### **5.3.4 Issues Raised by I&APs and Consultation Bodies**

Any comments received during the circulation of the DSR will be summarised in the final Scoping Report. The full wording and original correspondence are included in Appendix C6.

## 5.4 THE ENVIRONMENTAL ATTRIBUTES ASSOCIATED WITH THE PREFERRED ALTERNATIVE

The following sections provide general information on the biophysical and socio-economic attributed associated with the preferred alternative (i.e., the location of the development footprint within the affected property).

### 5.4.1 Biophysical Environment

The biophysical environment is described with specific reference to geology, soils, agricultural potential, vegetation and landscape features, climate, biodiversity, heritage features (in terms of archaeology and palaeontology), the visual landscape and the social environment to be affected. A number of specialists were consulted to assist with the compilation of this chapter of the report – refer to the [Table 1.1](#).

The project site is currently mostly a combination of grassland and exotic woodlots. The predominant land use on the site and immediate surrounds is Eucalyptus plantations with some cattle grazing. There is no infrastructure on site, except for jeep tracks for access. A Channelled Valley Bottom wetlands exists east of the site. These features are described are described in more detail below.

#### 5.4.1.1 Climate

The site has a summer rainfall with a mean annual rainfall of approximately 588 mm and a mean annual evaporation of approximately 1,565 mm (Schulze, 2009). The site is situated on hilly terrain at an altitude of around 1,565 metres and average slopes of approximately 4%. The geology is shale, slate and quartzite of the Pretoria Group with interlayered diabase sills and Hekpoort lava. Chert, dolomite, Black Reef quartzite, grit and shale occurs in places. The entire site is on land type Fb15. The site is dominated by loamy soils limited in depth by underlying bedrock. Dominant soil forms are Hutton, Mispah and Glenrosa. Rock outcrops are common. Due to their limited depth, such soils have insufficient moisture capacity to reliably carry a crop through the season. Some deeper soils are likely to occur in places but will be of insufficient size and separated by shallow soils and rock outcrops so that they are not viable for crop production.

#### 5.4.1.2 Geology

According to the Desktop Geotechnical study (Appendix E10), the general geology of the area comprises late Archean to early Proterozoic metasediments of the basal Malmani Subgroup Dolomites and limestone which form parts of the Chuniespoort Group; and the overlying Rooihogte formations forming the base of the Pretoria Group, and all associated with the Transvaal Supergroup. The Transvaal metasediments, especially the Rooihogte formations have been intruded by igneous diabase rocks which appear to underly some of the sites in the south. Three of the proposed Solar Sites (each assessed via individual S&EIR processes) overlie the Malmani Dolomites as follows:

- Carmel Solar 1
- Turffontein Solar 1
- Varkenslaagte Solar

While the remaining Carmel Solar 2 and Carmel Solar 3 sites appear to predominately overlie the Rooihogte formation and igneous diabase rocks with potentially only small areas of their

northern margins overlying the Malmani Subgroup (Figure 5.6 – Geological plan). The Malmani Subgroup is divided into five formations based on the relative composition of cherts, stromatolites, limestones and shales. The specific Malmani Subgroup formations overlying the three solar sites (indicated in bullet form above) is not defined on the geological map. Much younger quaternary aged surficial transported and residual soils are likely to occur overlying these rocks.



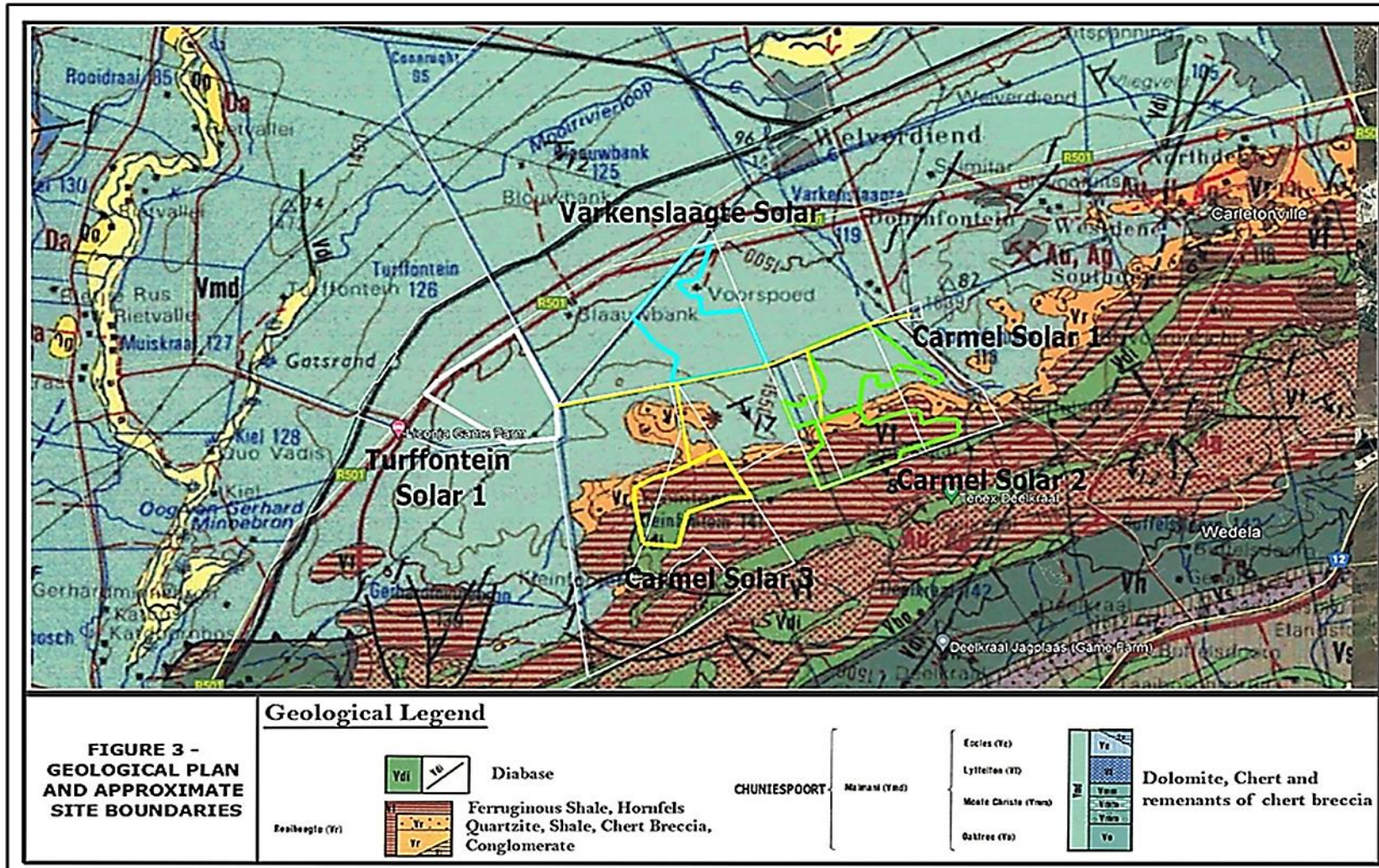


Figure 5.6: Geological plan



### 5.4.1.3 Topography

Topographically the area is relatively flat to slightly undulating at Turffontein and Varkenslaagte Solar sites (assessed via individual S&EIR processes) located to the relative north. While southward the terrain gradually increases and becomes more undulating towards the hills that skirt the southern boundaries of Carmel Solar 1 to 3 sites. Satellite imagery indicates large stands of man-made, presumably exotic forests, which overlie the proposed Carmel Solar 1 to 3 and Varkenslaagte Solar development sites while the remaining land surface over all the sites is dominated by veld grasses and shrubs (likely grazed by livestock), and bisected by an array of internal farm dirt roads. Satellite imagery also indicates sporadic rock outcrop as well as red soils indicated by shallow excavations. Besides the non-perennial river skirting the eastern boundary of Carmel Solar 1 site, no significant drainage lines seem to be present, however where the topography increases particularly in the south, at least minor drainage lines are to be expected. Refer to Figure A appended to this report.

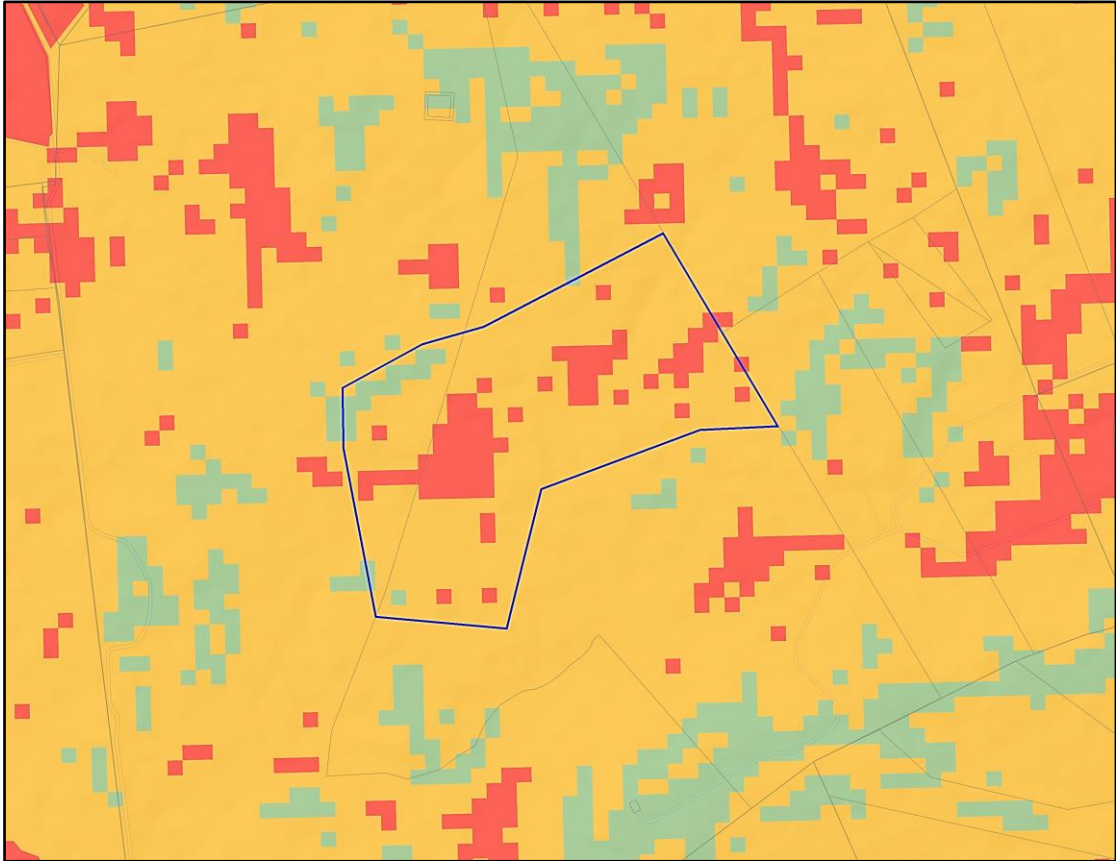
### 5.4.1.4 Soils and Agricultural Potential

According to the Agriculture Compliance Statement (attached in Appendix E5), the purpose of including an agricultural component in the environmental assessment process is to ensure that South Africa balances the need for development against the need to ensure the conservation of the natural agricultural resources, including land, required for agricultural production and national food security. The different categories of agricultural sensitivity, used in the national web-based environmental screening tool, indicate the priority by which land should be conserved as agricultural production land

The agricultural sensitivity is a direct function of the capability of the land for agricultural production. All arable land that can support viable crop production, is classified as high (or very high) sensitivity. This is because there is a scarcity of arable production land in South Africa and its conservation for agricultural use is therefore a priority. Land which cannot support viable crop production is much less of a priority to conserve for agricultural use and is rated as medium or low agricultural sensitivity.

The screening tool classifies agricultural sensitivity according to only two independent criteria – the land capability rating and whether the land is used for cropland or not. All cropland is classified as at least high sensitivity, based on the logic that if it is under crop production, it is indeed suitable for it, irrespective of its land capability rating.

None of the land is classified as cropland and agricultural sensitivity on the screening tool (refer to Figure 5.7) is therefore purely a function of land capability. The classified land capability of the sites is predominantly 7 to 9 but ranges from 5 to 9. The small-scale differences in the modelled land capability across the project area are not very accurate or significant at this scale and are more a function of how the data is generated by modelling, than actual meaningful differences in agricultural potential on the ground. Values of 1 to 5 translate to a low agricultural sensitivity, values of 6 to 8 translate to a medium agricultural sensitivity and values of 9 to 10 translate to a high agricultural sensitivity.



**Figure 5.7:** Agricultural sensitivity of the development footprint as per the results of the DFFE Screening Tool (Appendix B)

The land across the site is assessed as being unsuitable for viable crop production. According to the land type data confirmed by the site sensitivity verification, the site is dominated by soils limited in depth by underlying bedrock. Due to their limited depth, such soils have insufficient moisture capacity to reliably carry a crop through the season. A generally reliable indication of soil cropping potential, or soil capability, is historical land use because the suitable versus the unsuitable soils get identified over time through trial and error. None of the land across the site has been used for crop production within the period covered by historical imagery available on Google Earth, which is eighteen years. This is further evidence that the site is highly unlikely to be suitable for viable crop production.

A land capability rating of  $\geq 8$  denotes land that is suitable for viable rain fed crop production. The land capability of this site is assessed as being  $< 8$  due to the soil depth limitations and resultant lack of suitability for viable crop production. The high agricultural sensitivity of part of the site, as identified by the screening tool, due to a classified land capability of up to 9, is therefore disputed by the agriculture assessment.

This site sensitivity verification verifies the entire site as having a land capability of less than 8 and therefore being of medium agricultural sensitivity. The required level of agricultural assessment is therefore confirmed as an Agricultural Compliance Statement.

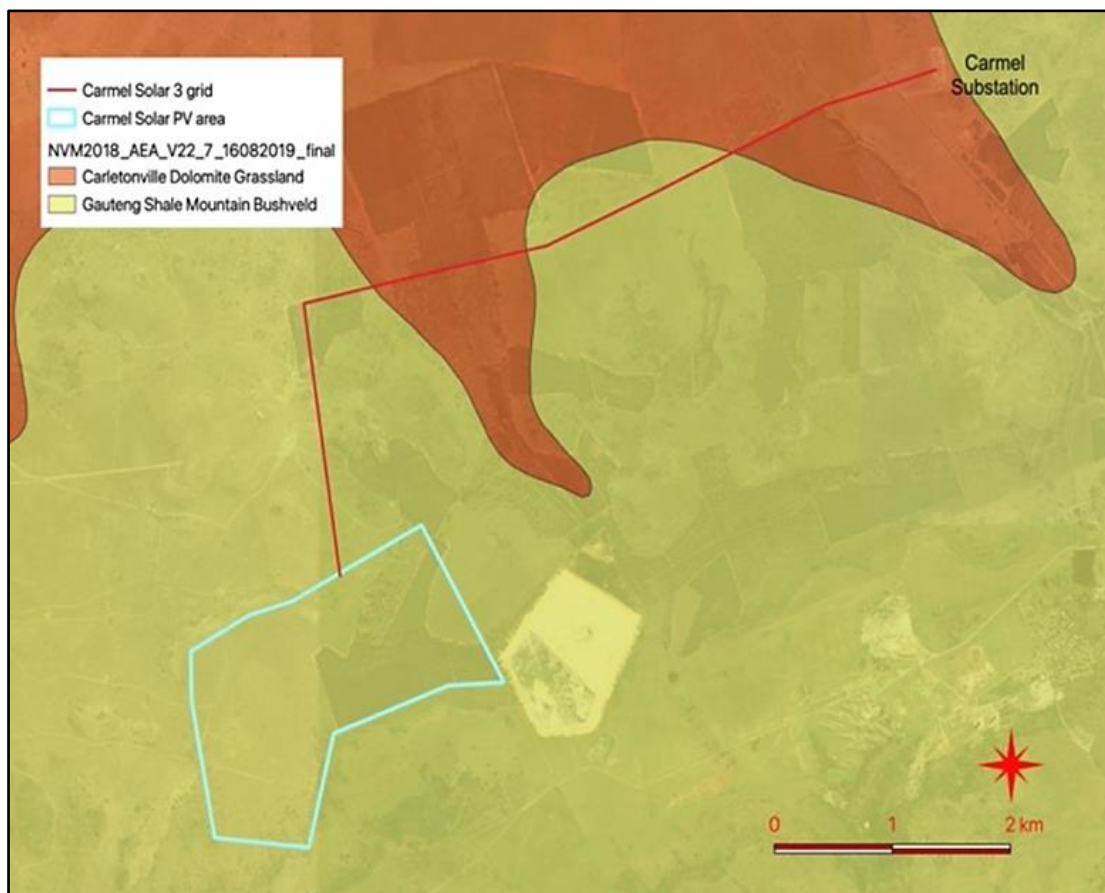
#### **5.4.1.5 Terrestrial Ecology**

According to the Terrestrial Biodiversity Assessment (attached in Appendix E2), the study area falls within the grassland biome. The Grassland Biome in South Africa occurs mainly on the high central plateau (Highveld), the inland areas of the eastern seaboard, the mountainous areas of KwaZulu-Natal and the central parts of the Eastern Cape. The topography is mainly flat to rolling, but also includes mountainous regions and the Escarpment. The temperate grasslands of southern Africa occur where there is summer to strong summer rainfall and winter drought. The rainfall may vary spatially from 400 – 2 500 mm per year and corresponds to the amount of rainfall found in other parts of the world where similar vegetation is found. Frost is a common phenomenon; the coldest periods (June–August) are exacerbated by aridity or along an increasing elevation gradient. Fog is found on the upper slopes of the Great Escarpment and seaward scarps, which support hygrophilous mistbelt vegetation. The biome has high lightning flash densities, making the incidence of lightning-induced fire a relatively high likelihood (Mucina & Rutherford, 2006).

Grasslands are structurally simple and strongly dominated by grasses (Poaceae). The canopy cover is moisture-dependant and decreases with lower mean annual rainfall, but is influenced by the amount and type of grazing and by the presence of fire. Minimum temperature plays a decisive role in structurally distinguishing temperate grasslands from those where frosts are rare (Walker 1993). Woody species, where they occur, are limited to specialised niches/habitats. Forbs form an important component of grasslands and, although not usually dominant, probably contribute more to the species richness of grasslands than grass species do (Mucina & Rutherford, 2006).

#### ***Regional Vegetation Patterns***

There are two regional vegetation types occurring on site, namely Carletonville Dolomite Grassland and Gauteng Shale Mountain Bushveld. Refer to Figure 5.8. below.



**Figure 5.8:** Regional vegetation types of the study area

Carletonville Dolomite Grassland

Found in North-West (mainly) and Gauteng and marginally into the Free State Province. It is found in the region of Potchefstroom, Ventersdorp and Carletonville, extending westwards to the vicinity of Ottoshoop, but also occurring as far east as Centurion and Bapsfontein in Gauteng Province. It is found at an altitude range of 1 360–1 620 m, but largely from 1 500–1 560 m. The vegetation type occurs on slightly undulating plains dissected by prominent rocky chert ridges. It is generally a species-rich grassland forming a complex mosaic pattern dominated by many species. Dolomite and chert of the Malmani Subgroup (Transvaal Supergroup) supporting mostly shallow Mispah and Glenrosa soil forms typical of the Fa land type, dominating the landscapes of this unit. Deeper red to yellow apedal soils (Hutton and Clovelly forms) occur sporadically, representing the Ab land type. It occurs in warm-temperate, summer-rainfall region, with overall MAP of 593 mm. Summer temperatures high. Severe frequent frost occurs in winter.

Gauteng Shale Mountain Bushveld

Gauteng and North-West Provinces: Occurs mainly on the ridge of the Gatsrand south of Carletonville–Westonaria–Lenasia. Also occurs as a narrow band along the ridge that runs from a point between Tarlton and Magaliesberg in the west, through Sterkfontein, Pelindaba, Atteridgeville to Klapperkop and southeastern Pretoria in the east. Altitude 1 300–1 750 m. it occurs in low, broken ridges varying in steepness and with high surface rock cover. Vegetation is a short (3–6 m tall), semi-open thicket dominated by a variety of woody species. Dominated

by shale and some coarser clastic sediments as well as significant andesite from the Pretoria Group (Transvaal Supergroup), all sedimentary rocks. A part of the area is underlain by Malmani dolomites of the Chuniespoort Group (Transvaal Supergroup). Soils are mostly shallow Mispah, but are deeper at the foot of the slopes. Land type is mostly Fb, with some lb. It occurs in areas with summer rainfall with very dry winters. MAP 600 – 750 mm, increasing from west to east as well as with higher elevation. Frost frequent, higher in the west and south.

#### Conservation Status of Vegetation Types

Neither vegetation type is listed in the National List of Ecosystems that are Threatened and need of protection (GN1002 of 2011). This status is the same for the National Biodiversity Assessment 2018 (Skowno et al. 2019). It is therefore verified that the site does not occur within any Listed Ecosystem, as listed in The National List of Ecosystems that are Threatened and need of protection (GN1002 of 2011) and therefore has LOW sensitivity with respect to this attribute.

#### ***Plant species that are Flagged for the Site***

There is one plant species flagged for the site in the DEA Online Screening Tool output, listed as a sensitive species, therefore its name and details may not be provided here. The species occurs in natural grassland. However, they were not found on site, despite a careful search in suitable areas of habitat.

There are no known additional listed species from further afield with a geographical distribution that may include the site.

#### ***Protected Trees***

Tree species protected under the National Forest Act are listed in Appendix 2 of the Plant Species Compliance Statement. There are three that have a geographical distribution that includes the study area, *Boscia albitrunca* (Shepherd's Tree/Witgatboom/!Xhi), *Vachellia erioloba* (camelthorn), and *Pittosporum viridiflorum*.

None of these were found on site. Based on the detailed search of the site, it is considered unlikely that any occur there.

#### ***Declared Invasive Alien Species***

The Alien and Invasive Species Regulations (GNR 599 of 2014) are stipulated as part of the National Environmental Management: Biodiversity Act (10/2004). The regulation listed a total of 559 alien species as invasive and further 560 species are listed as prohibited and may not be introduced into South Africa. Below is a brief explanation of the four categories of Invasive Alien Plants as per the regulation.

**Category 1** plants are prohibited plants which must be controlled or eradicated. These plants serve no economic purpose and possess characteristics that are harmful to humans, animals or the environment.

- Category 1a: Plants are high-priority emerging species requiring compulsory control. All breeding, growing, moving and selling are banned

- Category 1b: Plants are widespread invasive species controlled by a management program.

**Category 2** plants are invaders with certain useful qualities, such as commercial use or for woodlots, animal fodder, soil stabilisation, etc. These plants are allowed in demarcated areas under controlled conditions and in biocontrol reserves.

**Category 3** plants are alien plants that are currently growing in, or have escaped from areas such as gardens, but that are proven invaders. No further planting is allowed (except with special permission), nor trade in propagative material. Existing plants may remain but must be prevented from spreading. Plants within the flood line and watercourses must be removed (Bromilow, 2010).

A small number of declared alien invasive species were found on site. These are listed in Appendix 1 of the Plant Species Compliance Statement.

### ***Biodiversity Conservation Plans***

The Gauteng C-Plan version 3.3 classifies the natural vegetation of the province according to conservation value in decreasing value, as follows:

- Protected
- Irreplaceable
- Important
- Ecological Support Area

According to the Gauteng Conservation Plan, there is a band through the centre of the site, as well as connected patches in the north-western and south-western corners (most remaining areas of natural grassland) mapped as "Ecological Support Areas". The powerline corridor also passes through this area mapped as "Ecological Support Areas", and a small section mapped as "Important Area" (Figure 5.9). This indicates that some parts of the site are important for maintaining biodiversity patterns.

Note that the purpose of the specialist study, as undertaken here, is to verify whether the vegetation on site meets the standards for inclusion in a conservation zone or not. Provincial-level conservation assessments make use of remote methods for mapping and do not ground-truth all locations. It is necessary to verify on the ground whether there is natural habitat.

This desktop description verifies that the site is included in conservation zones and that an on-site assessment is required to verify the sensitivity of the site with respect to this attribute. The field assessment and sensitivity mapping confirms that these zones are mostly in a natural state and therefore valid.





**Figure 5.9:** Gauteng CBA map for the study area

***Protected Areas, Critical Biodiversity Areas (CBA) and Ecological Support Areas (ESA)***

According to the National Protected Areas Expansion Strategy 2008 (NPAES2008), there are no areas within the study area that have been identified as priority areas for inclusion in future protected areas. The study area is therefore outside the NPAES focus area. A draft updated National Protected Areas Expansion Strategy was published for public comment in 2018, but is deliberately not available as a spatial dataset. It does, however, indicate that each province is responsible for its own strategy. In practice, most provinces currently use the CBA map as a proposed protected area strategy. This means that Irreplaceable Areas in Gauteng are also priority areas for the 2018 National Protected Areas Expansion Strategy.

According to the Terrestrial Biodiversity Assessment (attached in Appendix E2), parts of the site are within a Critical Biodiversity Area (CBA) or an Ecological Support Area (ESA) as indicated in Figure 5.9. above.

***Habitats on Site***

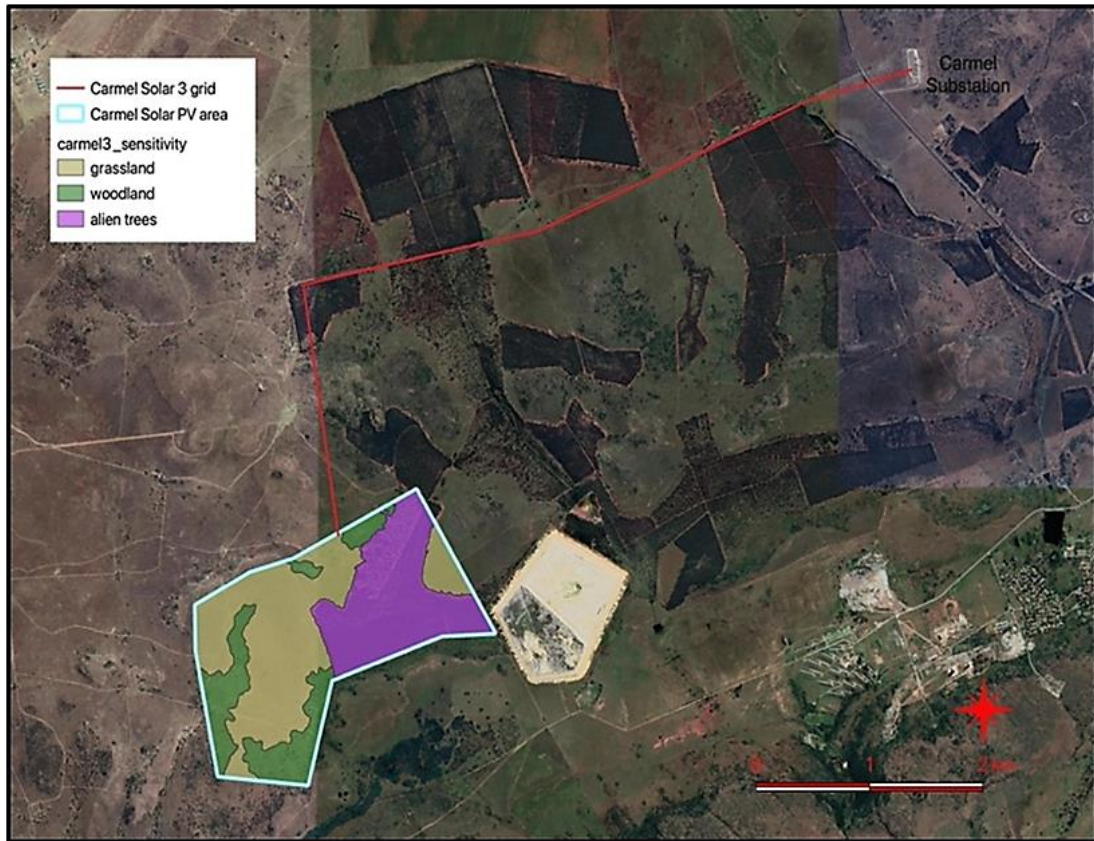
A broad classification of the habitat units on site, which also reflects relatively uniform plant species compositional units, is as follows:

Natural habitats:

1. Natural grassland (open grassland with original natural species composition);
2. Woodland (mostly thorn savanna with a diversity of broad-leaved shrubs included).

Transformed and degraded areas:

3. Alien trees (primarily formal woodlots, but also scattered escapees).



**Figure 5.10:** Main habitats of the study area

### ***Habitat Sensitivity***

The Species Environmental Assessment Guidelines (SANBI 2020) require that a Site Ecological Importance is calculated for each habitat on site, and provides methodology for making this calculation.

1. Natural grassland (open grassland);
2. Old lands (secondary grasslands on old lands);
3. Woodlots and alien trees.

As per the Species Environmental Assessment Guidelines (SANBI 2020), Site Ecological Importance (SEI) is calculated as a function of the Biodiversity Importance (BI) of the receptor and its resilience to impacts ( $SEI = BI + RR$ ). The Biodiversity Importance (BI) in turn is a function of Conservation Importance (CI) and Functional Integrity (FI), i.e.  $BI = CI + FI$ . The results are detailed in Table 5.1.



**Table 5.1: SEI for habitats found on site**

Habitat	Conservation importance	Functional integrity	Receptor resilience	Site Ecological Importance (BI)
Natural grassland	<p style="text-align: center;"><b>Low</b></p> <p>Natural habitat of LC ecosystem type - no level set in Ecosystem Guidelines - this is next lowest level after VU ecosystem.</p>	<p style="text-align: center;"><b>Medium</b></p> <p>Large (&gt; 20 ha but &lt; 100 ha) intact area for any conservation status of ecosystem type or &gt; 10 ha for EN ecosystem types. (Chrissiesmeer Panveld is listed as EN)            BUT            Mostly minor current negative ecological impacts with some major impacts (e.g. established population of alien and invasive flora) and a few signs of minor past disturbance. Moderate rehabilitation potential.</p>	<p style="text-align: center;"><b>Low</b></p> <p>Habitat that is unlikely to be able to recover fully after a relatively long period - based on the fact that, for most of the project, soil disturbance will not take place therefore potential for recovery is greater than for projects where significant soil works are undertaken.</p>	<p style="text-align: center;"><b>Medium</b></p> <p>(BI = Low)</p>
Natural woodland	<p style="text-align: center;"><b>Low</b></p> <p>Natural habitat of LC ecosystem type - no level set in Ecosystem Guidelines - this is next lowest level after VU ecosystem.</p>	<p style="text-align: center;"><b>Medium</b></p> <p>Large (&gt; 20 ha but &lt; 100 ha) intact area for any conservation status of ecosystem type or &gt; 10 ha for EN ecosystem types. (Chrissiesmeer Panveld is listed as EN)            BUT            Mostly minor current negative ecological impacts with some major impacts (e.g. established population of alien and invasive flora) and a few signs of minor past disturbance. Moderate rehabilitation potential.</p>	<p style="text-align: center;"><b>Low</b></p> <p>Habitat that is unlikely to be able to recover fully after a relatively long period - based on the fact that, for most of the project, soil disturbance will not take place therefore potential for recovery is greater than for projects where significant soil works are undertaken.</p>	<p style="text-align: center;"><b>Medium</b></p> <p>(BI = Low)</p>

Woodlots and alien trees	Low No natural habitat remaining.	Very low Several major current negative ecological impacts.	High Habitat that can recover relatively quickly (5-10 years) to restore >75% to restore the original species composition and functionality	Very low (BI = Very low)
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The habitat sensitivity based in Table 5.1. translates into Figure 5.11. below.



**Figure 5.11:** Habitat sensitivity of the study area, based on Site Ecological Index

If natural areas can be significantly avoided, the proposed development can be authorised.

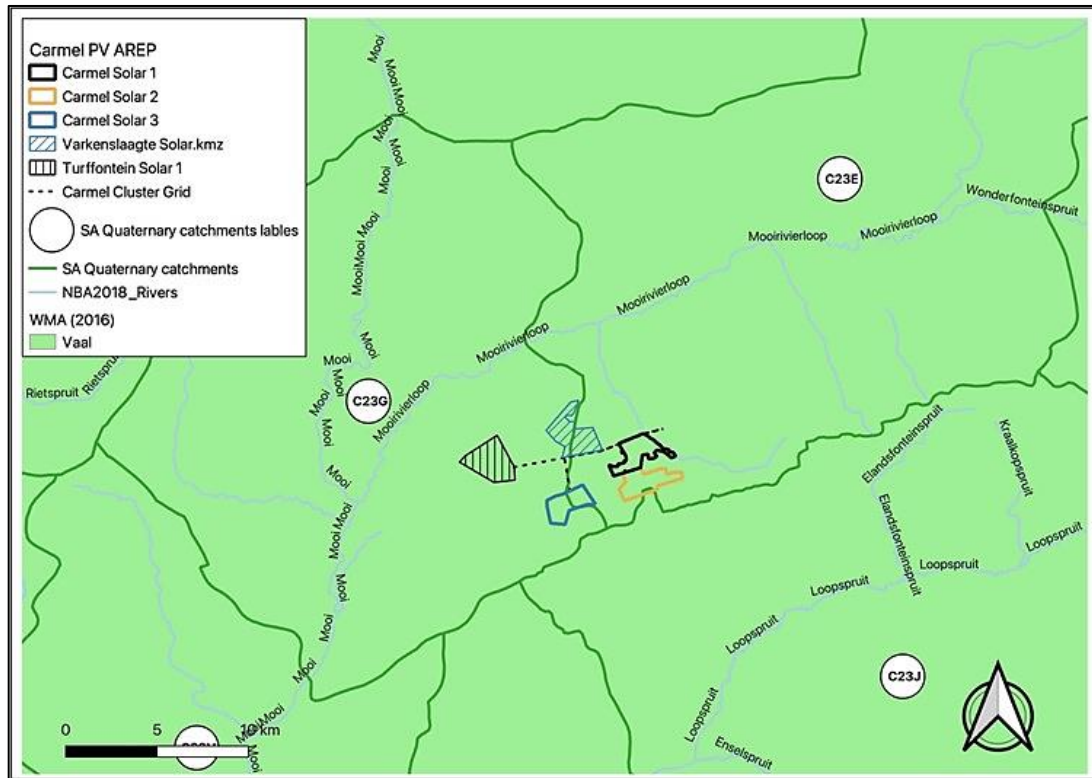
#### 5.4.1.6 Wetlands and Riparian Features

According to the Aquatic Ecological Assessment (Appendix E1), the greater study area (20km radius) was dominated by three major types of natural aquatic features and a number of artificial barriers associated with catchments and rivers, characterised as follows:

- Watercourses with Channelled Valley Bottom Wetlands;
- Grassland seepages areas; and
- Depressions, dominated by grass species

The artificial barriers included dam, weirs and voids (pits) created by previous mining activities.

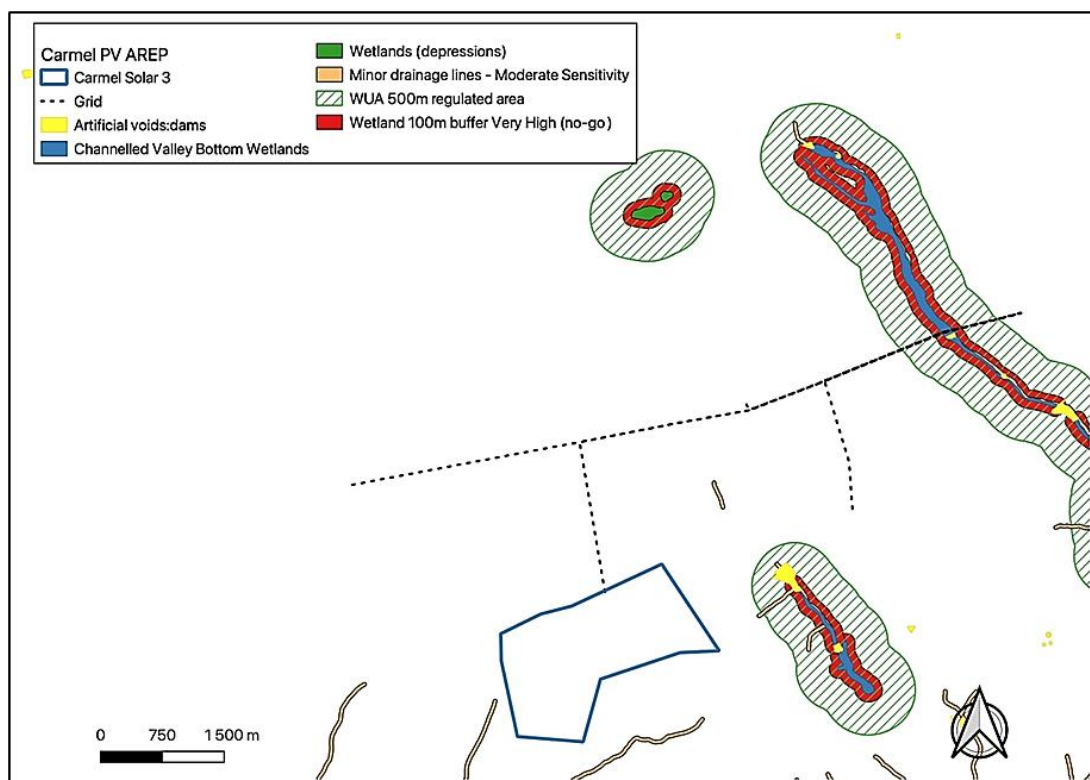
The study area is situated predominantly within the Gauteng Shale Mountain Bushveld (Svcb10) and Carletonville Dolomite Grassland (Gh15) vegetation units, associated with the upper reaches of the Mooirivierloop River (C23E) and Mooi River (C23G) catchments (Figure 5.12).



**Figure 5.12:** Locality map indicating the various quaternary catchments and mainstem rivers within the proposed project's boundaries

A Channelled Valley Bottom wetland lies to the east of the site just outside the project boundary.

Furthermore, the study area was thus characterised grasslands and alien vegetation stands, as well as past mining activities, and present farming practices. Although serval wetland features were identified within the surrounding areas, the Carmel Solar 3 PV facility project site lies well away from any wetland areas, i.e., Very High Sensitivity habitats.



**Figure 5.13:** Waterbodies delineated in this assessment based on ground-truthing information collected for the Carmel Solar 3 site

The impacts upon aquatic biodiversity associated with the project are of Low significance, after mitigation. The loss of irreplaceable aquatic habitat and/or important biota is highly unlikely. The impacts are considered to be easily mitigated (provided the mitigation measures and monitoring plan within the EMP and this report are implemented and adhered to during all phases of the project).

During the EIA phase, the final impact ratings will be revised based on the layouts that will be developed, and any conflicts will be pointed out to the developer. This may be coupled to additional site visits, but it is not foreseen at this point.

#### 5.4.1.7 Fauna

The primary cause of loss of biological diversity is habitat degradation and loss (IUCN, 2004; Primack, 2006). In the case of this study special attention was given to the identification of sensitive species or animal life and birds on site. The following section will discuss the state of biodiversity on the site in more detail.

There are six animal species flagged for the site in the DEA Online Screening Tool output, namely the following:

##### ***Tyto capensis (African Grass Owl)***

The African Grass Owl is listed as Vulnerable. It is confined to the higher rainfall areas in the eastern half of South Africa, where it typically roosts and breeds in tall, rank grass or sedges associated with damp substrates, such as permanent and non-perennial wetlands and streams. No suitable habitat was found on site. It is therefore not likely to occur there. A

detailed avifaunal assessment has been undertaken for this project where additional information can be obtained regarding this species. A detailed avifaunal assessment has been undertaken for this project where additional information can be obtained regarding this species.

***Eupodotis senegalensis (White-bellied Korhaan)***

The White-bellied Korhaan, listed as Vulnerable, is found patchily throughout the Afrotropics. In South Africa, it is most common in the Highveld region, being a near endemic to the Grassland Biome. It prefers slightly longer grass than other bustards but may move into more open areas and into cultivated lands to forage. Threats to this species include all the general threats to grasslands in the country. On site, the most likely favoured habitat for the species is any of the intact grassland areas, although secondary grassland could also be favourable. It has been previously recorded almost 50 km to the north of the site but not nearby. It is theoretically possible that it occurs on site but not likely. A detailed avifaunal assessment has been undertaken for this project where additional information can be obtained regarding this species.

***Lepidochrysops procera (Potchefstroom Blue Butterfly)***

The Potchefstroom Blue Butterfly (*Lepidochrysops procera*) is endemic to the Gauteng, KwaZulu-Natal, Mpumalanga, North West and Eastern Cape provinces in South Africa, from Kokstad in the south to Komatipoort in the north-east and Potchefstroom in the west. It is listed as Least Concern (Rare) and much of the Highveld population is under pressure from residential development and overgrazing. It occurs in rocky areas in grassland (and grassy areas in savanna), which occur on site. The larval host plant is reported variously as being *Ocimum obovatum* (Mecenero et al. 2013) or a combination of *Becium grandiflorum*, *Ocimum canum* and *Lippia scaberrima* (Woodhall 2005). The presence of the host ant (probably a *Camponotus* species) is an additional requisite. Broadly suitable habitat occurs on site (rocky areas in grassland), as well as the larval host plant, *Ocimum obovatum*. It is therefore possible for it to occur there but considered unlikely. The species has been previously recorded in two adjacent grids (E and S of the site) but not within the current site (vmus.adu.org.za).

***Crocidura maquassiensis (Maquassie Musk Shrew)***

The Maquassie Musk Shrew (*Crocidura maquassiensis*), listed as Vulnerable, is endemic to South Africa, Eswatini and Zimbabwe, where it is found in moist grassland habitats in Savannah and Grassland Biomes. It appears to tolerate a wide range of habitats, although threats to the species have been inferred as being related to loss or degradation of moist, productive areas, such as rank grassland and wetlands. The species is patchily distributed within the north-eastern part of South Africa. The study area is within the known distribution of this species in the sense that there are records in quarter degree grids throughout the Highveld, although not from the current grid or any nearby grids. It is, however, flagged in the DFFE Online Screening Tool as potentially occurring on site. Broadly suitable habitat occurs on site, but it is very difficult to determine whether it occurs there or not without undertaking extensive trapping studies that may yield little additional information. It was not seen on site and it is assumed that it does not occur there.



### ***Hydricus maculicollis* (Spotted-necked Otter)**

The Spotted-necked Otter (*Hydricus maculicollis*), listed as Vulnerable, is widely but patchily distributed in the higher parts of the eastern half of South Africa. It is also found in lakes and large rivers throughout much of Africa south of 10°N. They are restricted to areas of permanent fresh water where there is good shoreline cover and an abundant prey base (small fishes). They prefer water that is not silt-laden and is unpolluted, but are known to occur in relatively polluted rivers, such as the Braamfonteinspruit, Jukskei and Blesbokspruit in Gauteng. The site is within the known distribution of this species and there are historical records for one nearby grid, although not from the current grid. No suitable habitat was found on site. It is therefore not likely to occur there.

### ***Clonia uvarovi* (Uvarov's Bush Cricket)**

Uvarov's Clonia (*Clonia uvarovi*) is endemic to the highveld region of South Africa, and has only been recorded from Gauteng and North-West Provinces. It occurs in tall, woodland savannah. The threat status is Vulnerable. Its extent of occurrence is relatively small (~5,000 km<sup>2</sup>), it has only been recorded in five locations, and the area, extent and quality of its habitat are expected to be in decline due to grazing pressure, cultivation, urban development, invasive alien plants and climate change. No suitable habitat occurs on site and it is unlikely to occur there.

#### Species of Conservation Concern (SCC)

No terrestrial animal SCC were found on site or are likely to occur there. Significant parts of the site consist of alien woodlots. There are natural areas on the property, but these do not contain habitat suitable for any of the terrestrial animal species flagged for the site. The proposed development does not affect any habitats important for terrestrial animal species of concern and is therefore supported.

#### **5.4.1.8 Avifauna**

##### Avifaunal Species Richness

According to the Avifaunal Scoping Report (Appendix E3), approximately ~188 bird species have been recorded within the Carmel Cluster study area. The richness was inferred from the South African Bird Atlas Project (SABAP2) (Harrison et al., 1997; [www.sabap2.birdmap.africa](http://www.sabap2.birdmap.africa)) and the presence of suitable habitat in the study area. This equates to 19 % of the approximate 990 species listed for the southern African subregion (and approximately 21.5 % of the 871 species recorded within South Africa). However, the species richness obtained from the pentad grids corresponding to the proposed footprint sites (c. 2625\_2710 and 2625\_2715) is lower and range between 23 and 89 species, with an average number of 48 species for each full protocol card submitted (for observation of two hours or more).

According to Table 5.2, the study area is poorly represented by biome-restricted species (refer to Table 5.3).

**Table 5.2:** A summary table of the total number of species, Red listed species (according to Taylor et al., 2015 and the IUCN, 2022), endemics and biome-restricted species (Marnewick et al., 2015) expected (sensu SABAP2) to occur in the study site and immediate surroundings

Description	Expected Richness Value (Carmel Cluster)
Total number of species*	188
Number of Red Listed species*	1
Number of biome-restricted species – Zambezan and Kalahari-Highveld Biomes)*	3

**Table 5.3:** Expected biome-restricted species (Marnewick et al, 2015) likely to occur on the study site and immediate surroundings

Species	Kalahari-Highveld	Zambezan	Expected Frequency of Occurrence
Kalahari Scrub Robin ( <i>Cercotrichas paena</i> )	X		Common
White-bellied Sunbird ( <i>Cinnyris talatala</i> )		X	Uncommon
White-throated Robin-chat ( <i>Cossypha humeralis</i> )		X	Expected

Table 5.4. provides an overview of bird species of conservation concern that could occur on the proposed study areas based on their historical distribution ranges and the presence of suitable habitat. According to Table 5.4, one species (c. Cape Vulture *Gyps coprotheres*) have been recorded within the Carmel cluster solar area (sensu SABAP1 & SABAP2).

It is evident from Table 5.4. that the globally endangered Cape Vulture (*Gyps coprotheres*) and the globally near threatened Black-winged Pratincole (*Glareola nordmanni*) have a high likelihood of occurrence pending the presence of suitable food (livestock carcasses) and seasonality (e.g., the pratincoles are non-breeding summer visitors to the area).

The remaining species have low reporting rates and are regarded as irregular foraging visitors with low probabilities of occurrence often due to the absence of suitable habitat on the physical development footprint sites. However, extensive areas of suitable foraging habitat persist for the Secretarybird (*Sagittarius serpentarius*) to occur despite being ominously absent from the most of the proposed area. It is possible that the low reporting rates reflect the poor coverage of the study areas by citizen scientists (e.g., birdwatchers), especially since the site occurs on privately owned farms, and these species could occur in higher numbers due to being overlooked.

**Table 5.4:** Bird species of conservation concern that could utilise the proposed study areas and immediate surroundings based on their historical distribution range and the presence of suitable habitat. Red list categories according to the IUCN (2022)\* and Taylor et al. (2015)\*\*.

Species	Global Conservation Status*	National Conservation Status**	Mean Reporting rate: Carmel Solar Cluster	Preferred Habitat	Potential Likelihood of Occurrence
<i>Circus ranivorus</i> (African Marsh Harrier)	-	Endangered	-	Restricted to permanent wetlands with extensive reedbeds.	Probably absent from the proposed development footprint sites due to the absence of suitable habitat. and adjacent
<i>Circus macrourus</i> (Pallid Harrier)	Near threatened	Near threatened		Dry and moist open grassland, especially in the vicinity of wetland systems	Regarded as an irregular summer foraging visitor to the study areas.
<i>Glareola nordmanni</i> (Black-winged Pratincole)	Near threatened	Near threatened	-	Varied, but forages over open short grassland, pastures and agricultural lands (especially when being tilled)	Regarded as an uncommon to fairly regular foraging visitor to the study areas.
<i>Gyps coprotheres</i> (Cape Vulture)	Endangered	Endangered	5 (known from a two observations, the most recent being 09 April 2016)	Mainly confined to mountain ranges, especially near breeding site. Ventures far afield in search of food.	Regarded as a regular foraging/scavenging visitor to the respective study areas pending the presence of food (e.g., livestock carcasses).
<i>Phoenicopterus roseus</i> (Greater Flamingo)	-	Near threatened	-	Restricted to large saline pans and other inland water bodies.	A highly irregular foraging visitor to the physical development footprint sites due to the



Species	Global Conservation Status*	National Conservation Status**	Mean Reporting rate: Carmel Solar Cluster	Preferred Habitat	Potential Likelihood of Occurrence
<i>Sagittarius serpentarius</i> (Secretarybird)	Endangered	Endangered	-	Prefers open grassland or lightly wooded habitat.	absence of suitable habitat. The Carmel Solar 3 PV facility provide suitable foraging habitat for this species despite that fact that it has been observed from the area. Its status on the study area will be verified during the EIA/baseline survey.

A total of 41 collision-prone bird species have been recorded from the Carmel Cluster. It is evident that approximately 37 species could interact with powerlines, while 23 species could interact with the panel infrastructure.

#### 5.4.2 Cultural and Heritage Aspects

The cultural landscape qualities of the region essentially consist of two components. The first is a rural area in which the human occupation is made up of a limited pre-colonial (Stone Age and Iron Age) occupation and a much later colonial (farmer) component. The second component is an urban one consisting of a number of smaller towns, most of which developed during the last 150 years or less. Added to this is the development of a number of gold mines in the region.

From a review of the available old maps and aerial photographs it can be seen that the project area has always been open space, with the main activity being grazing, for which limited infrastructure such as watering points, were developed.

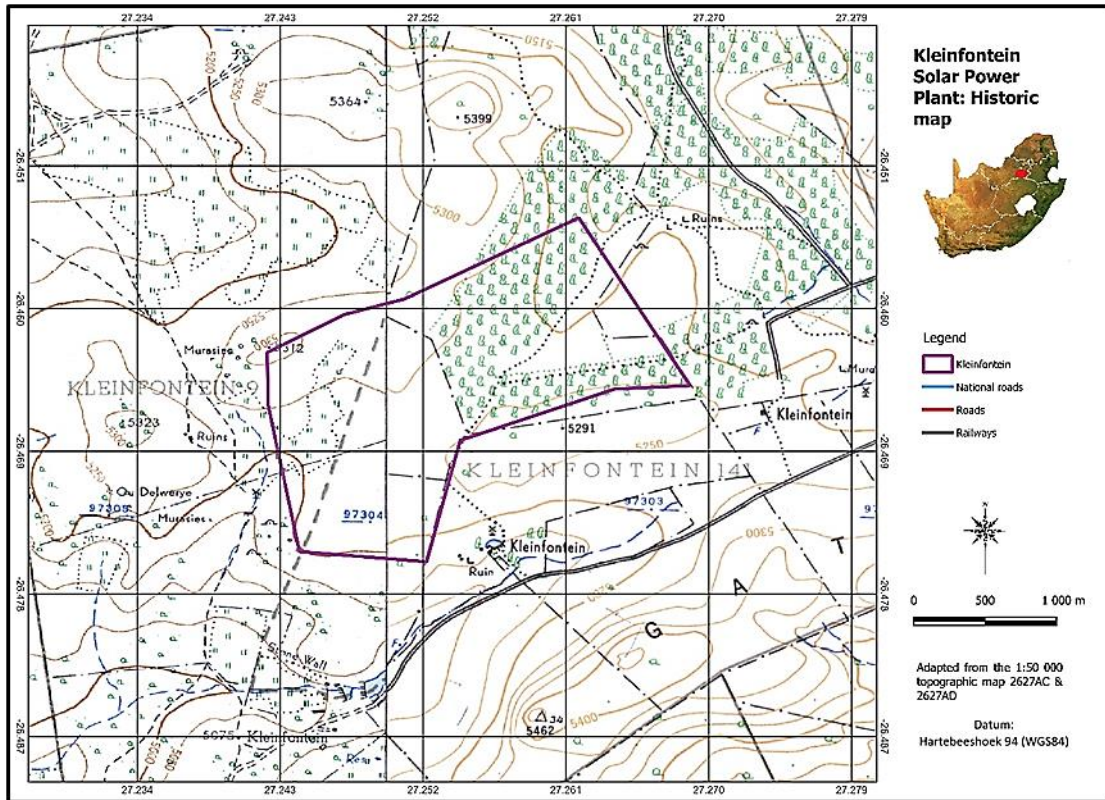


Figure 5.14: The project area on the 1958 version of the 1:50 000 topographic map

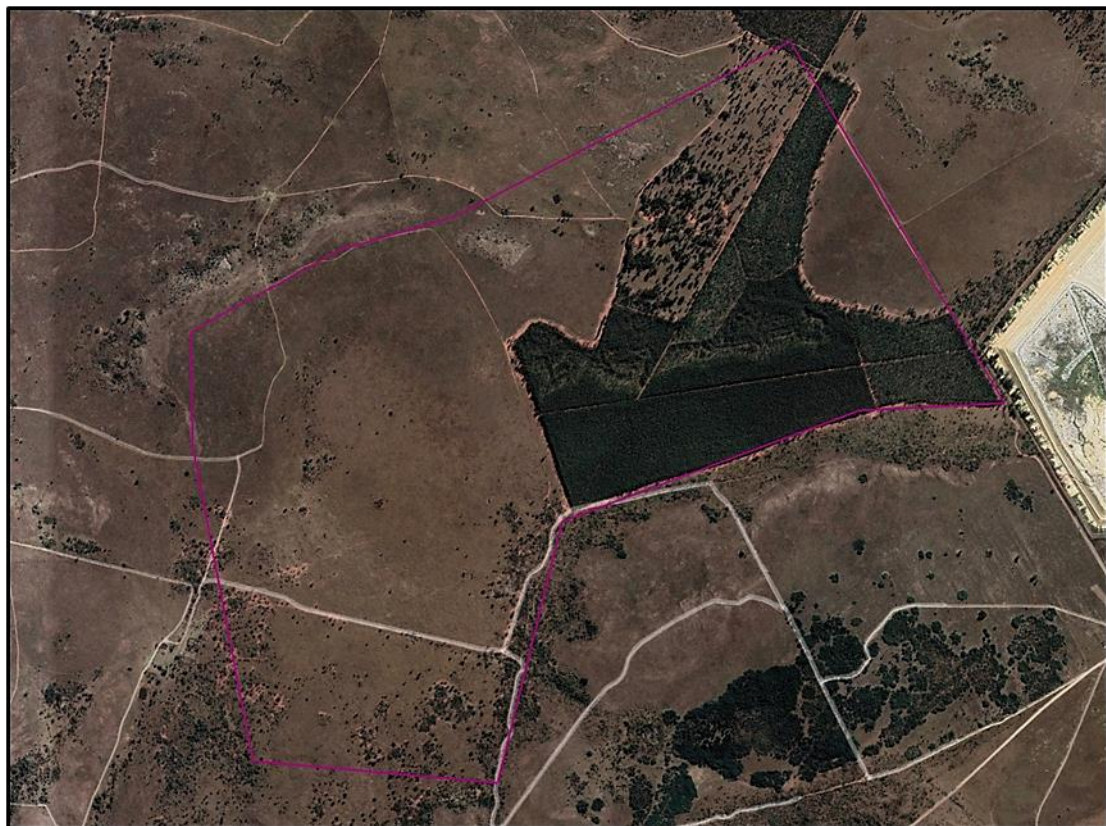


Figure 5.15: Aerial view of the project area dating to 2022

During the survey, the following sites, features and objects of cultural significance were identified in the project area.

#### **5.4.2.1 Historical, Archaeological and Built Environment**

##### ***Stone Age***

Very little habitation of the central highveld area took place during Stone Age times. Tools dating to the Early Stone Age period are mostly found in the vicinity of larger watercourses, e.g., the Vaal River or the Harts River and especially in sheltered areas such as at the Taung fossil site. During Middle Stone Age (MSA) times (c. 150 000 – 30 000 BP), people became more mobile, occupying areas formerly avoided. In many cases, tools dating to this period are found on the banks of the many pans that occur all over. The MSA is a technological stage characterized by flakes and flake-blades with faceted platforms, produced from prepared cores, as distinct from the core tool-based ESA technology. The repeated use of caves indicates that MSA people had developed the concept of a home base and that they could make fire. These were important steps in the cultural evolution of humanity. Furthermore, the widespread use of red ochre, presumably as body paint, also shows that MSA behaviour had become more human.

Late Stone Age (LSA) people had even more advanced technology than the MSA people and therefore succeeded in occupying even more diverse habitats. Some sites are known to occur in the region. These are mostly open sites located near river and pans. For the first time we also get evidence of people's activities derived from material other than stone tools. Ostrich eggshell beads, ground bone arrowheads, small, bored stones and wood fragments with incised markings are traditionally linked with the LSA.

The LSA people have also left us with a rich legacy of rock art, which is an expression of their complex social and spiritual beliefs. It is essentially religious (Lewis-Williams 1981). Among other aspects, the art expresses beliefs about the role of shamans in controlling rain and game, and animals of power, such as eland and rhino, figure prominently.

No sites, features or objects of cultural significance dating to the Stone Age were identified in the project area.

##### ***Iron Age***

Iron Age people started to settle in southern Africa c. AD 300, with one of the oldest known sites at Broederstroom south of Hartebeespoort Dam dating to AD 470. Having only had cereals (sorghum, millet) that need summer rainfall, Early Iron Age (EIA) people did not move outside this rainfall zone, and neither did they occupy the central interior highveld area. Because of their specific technology and economy, Iron Age people preferred to settle on the alluvial soils near rivers for agricultural purposes, but also for firewood and water.

The occupation of the larger geographical area (including the study area) did not start much before the 1500s. By the 16th century things changed, with the climate becoming warmer and wetter, creating condition that allowed Late Iron Age (LIA) farmers to occupy areas previously unsuitable, for example the treeless plains of the Free State and North West Province. In areas devoid of trees, Sotho-Tswana-speakers built in stone to mark internal and external boundaries. Because of the need for stone, most stonewalled settlements were sited near rocky outcrops. Typically, a rubble core filled the space between two outer faces. Most were



similar in that animal enclosures formed a circle around a central open space. Adult cattle stayed in large enclosures in the circle and calves in the smaller kraals. The number of adult kraals reflects the number of cattle-owning families living in the homestead. If there is only one family, then only one kraal stands in the centre without a central open space.

This was also a period of great military tension. Armed Qriqua and Korana raiders on horseback were active in the northern Cape and Orange Free State by about 1790. The Xhosa were raiding across the Orange River about 1805. Military pressure from Zululand spilled onto the highveld by at least 1821. Various marauding groups of displaced Sotho Tswana moved across the plateau in the 1820s. Mzilikazi raided the plateau extensively between 1825 and 1837. The Boers trekked into this area in the 1830s. And throughout this time settled communities of Tswana people also attacked each other.

As a result of this troubled period, Sotho Tswana people concentrated into large towns for defensive purposes. In some instances, they took shelter in caves such as in Irene in Pretoria and at Lephalong, where they developed a whole town inside a cave (Hall 1995).

The earliest Iron Age settlers who moved into the North-West Province region were Tswana-speakers such as the Tlhaping, Hurutshe, Fokeng, Kgatla and Rolong. In the region of the study area, it was mostly the Bakwena baMare-a-Phogole who settled under their chief Kokosi in the region of Losberg south of Fochville (Vorster 1969:52).

Stone walled sites dating to the Late Iron Age and which can probably be linked to the baMare-a-Phogole occupation of the area, are found on the farm Kraalkop, which is possibly the origin of the farm's name.

This type of settlement has been classified as belonging to the Molokwane settlement type, which originates with the Western Tswana groups such as the Hurutshe. According to Huffman (2007:41) this type of settlement stretches across the hilly areas of Gauteng west to Zeerust and they date from the late eighteenth century to the beginning of the historic period. The sites of Jachfontein clearly shows the typical layout of these settlement, showing amalgamation into larger units increasing from west to east.

No sites, features or objects of cultural significance dating to the Iron Age were identified in the project area.

### ***Historic Period***

White settlers moved into the area during the first half of the 19th century. They were largely self-sufficient, basing their survival on cattle/sheep farming and hunting. Few towns were established, and it remained an undeveloped area until the discovery of coal and later gold. Potchefstroom was established in 1838, with Parys following a bit later in 1876, and following much later, Fochville in 1920 and Carletonville in 1948.

In 1837 the establishment of a trekker settlement at Klerksdorp marked the beginning of a new phase in the history of the region. Originally twelve trekker families settled on the farm Elandsheuvel, belonging to C.M. du Plooy. This settlement, known as 'Oude Dorp', had its first landdroos Jacob de Clercq, after which the settlement was then named. In 1853, the name was changed to Klerksdorp. With the discovery of gold in 1886 on the farm Rietpoort, the gold rush gave rise to a new settlement called 'Nieuwe Dorp'. In 1897 the railway line from Krugersdorp

reached Klerksdorp. The railway line from Fourteen Streams (Warden region), on the main line from Kimberley to Zimbabwe (then Rhodesia) was completed in 1906. (SESA 1973).

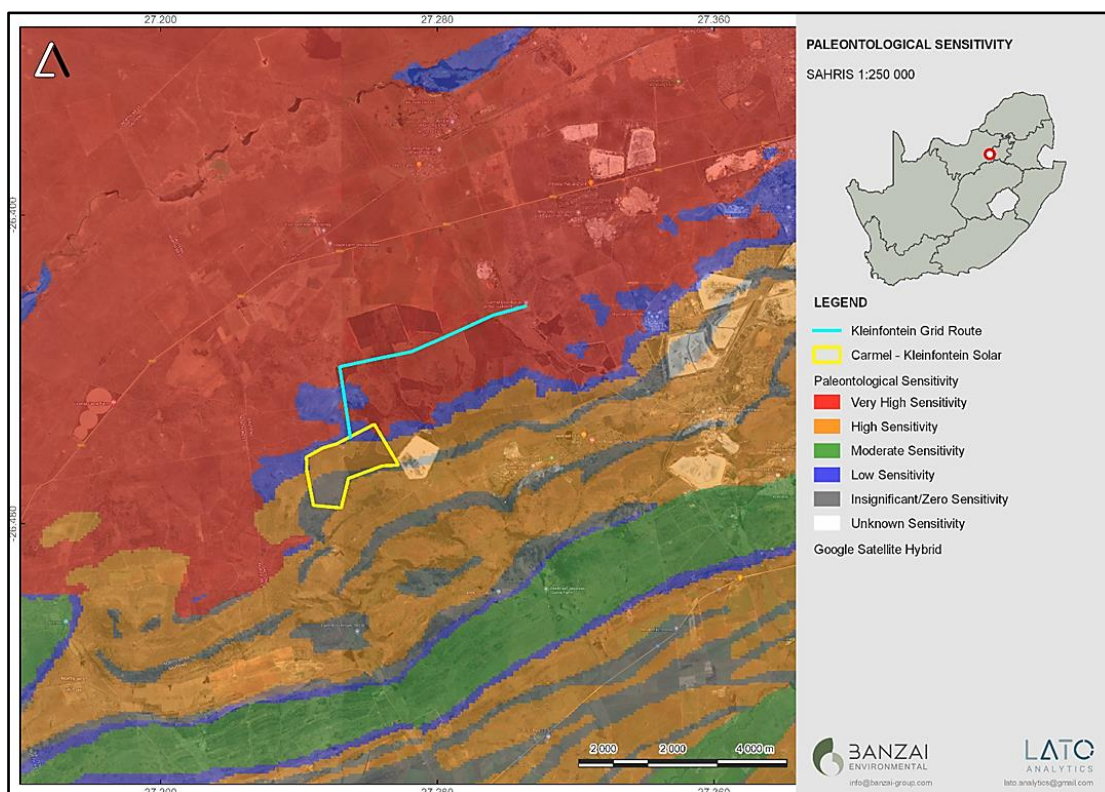
Gold made the Transvaal powerful, but it also created a clash between the Republicans and British immigrants who rushed to the goldfields. The ZAR government denied political rights to these Uitlanders, precipitating the ill-timed Jameson Raid of 1895/6. As is well known, Uitlander support did not materialize, and Jameson surrendered on January 2, 1896, near Krugersdorp.

During the Anglo-Boer War, a number of skirmishes occurred in the larger area. Most of these had to do with the British using the Vaal River as a border to catch the elusive Boer commandos. One such event took place in early August 1900, when Lord Methuen, coming from the south, forced Gen. De Wet across the Vaal River at Venterskroon, forcing the latter to retreat in the direction of what later was to become Fochville (Cloete 2000). What became known as the Battle of Frederickstad, located to the west of the project area, took place on 20 to 25 October 1900. Due to the hesitancy of Gen. P. J. Liebenberg to commit his forces to the battle, led to a large number of them killed, whereas the British did not suffer as much. The Republican dead were buried near the Frederickstad railway station (Van den Bergh 1996).

No sites, features or objects of cultural significance dating to the historic period were identified in the project area.

#### **5.4.2.2 Palaeontology**

According to the Paleontological Impact Assessment (Appendix E7), the Carmel Solar 3 development is underlain by the Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup), the Rooihogte and Timeball Hill Formations (Pretoria Group, Transvaal Supergroup) as well as unfossiliferous diabase. According to the PalaeoMap of the South African Heritage Resources Information System (SAHRIS) the Palaeontological Sensitivity of the Malmani Subgroup is Very High, that of the Timeball Hill Formation is High, while the Rooihogte has a Low Palaeontological Sensitivity. The Palaeontological Significance of the diabase is Zero as it is igneous in origin (Almond et al, 2013; SAHRIS website).



**Figure 5.16:** Extract of the 1: 250 000 SAHRIS PalaeoMap map (Council of Geosciences) indicating the proposed Kleinfontein Solar Photovoltaic Solar Energy Facility

A site-specific field survey of the development footprint was conducted on foot and by motor vehicle on 3 November 2022. During the site investigation no fossiliferous outcrops were detected. It is thus considered that the proposed Solar Energy Facility will not lead to detrimental impacts on the palaeontological resources of the area. The construction of the development may therefore be authorised as the development footprint is not considered sensitive in terms of palaeontological resources. It is consequently recommended that no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.

If fossil remains are discovered during any phase of construction, either on the surface or uncovered by excavations, the Chance Finds Protocol must be implemented. The ECO/site manager in charge of these developments must be notified immediately. These discoveries must be secured and the ECO/site manager must alert SAHRA so that appropriate mitigation (documented and collection) can be undertaken by a professional palaeontologist. The specialist would need a collection permit from SAHRA. Fossil material must be curated in an approved collection (museum or university) and all fieldwork and reports must meet the minimum standards for palaeontological impact studies developed by SAHRA.

### 5.4.3 Visual Landscape

Visual impacts occur when changes in the landscape are noticeable to viewers looking at the landscape from their homes or from parks and conservation areas, highways and travel routes, and important cultural features and historic sites.

#### 5.4.3.1 Visual Receptors

Visual Receptors can be defined as “Individuals, groups or communities who are subject to the visual influence of a particular project”.

Possible visual receptors identified within the 10km radius from the proposed development, which due to use could be sensitive to landscape change. They include:

- **Area Receptors** which include:
  - Deelkraal.
  - Wedela.
  - Welverdiend.
  - Khutsong.
  - Carletonville.
  - Blyvooruitzicht.
  - Abe Bailey Nature Reserve.
  - Elandsrand.
- **Linear Receptors** which include:
  - N12 National Road.
  - R501 Regional Road.
  - Buffelsdoorn Road.
- **Point Receptors** which include:
  - Homesteads on Farms.
  - Smallholdings.
  - Sports and Recreational Facilities.
  - Tourism and Lodging Facilities.

#### 5.4.3.2 Zone of Theoretical Visibility

A Zone of Theoretical Visibility (ZTV) is a Geographic Information System (GIS)-generated tool to identify the likely (or theoretical) extent of visibility of a development. The tool used in this model does not take existing screening into account but only the above mean sea level of the landscape.

**Table 5.5:** ZTV Assumptions

Radius	Impact Magnitude
0-1km	Very High
1-3km	High
3-5km	Medium
5-10km	Low

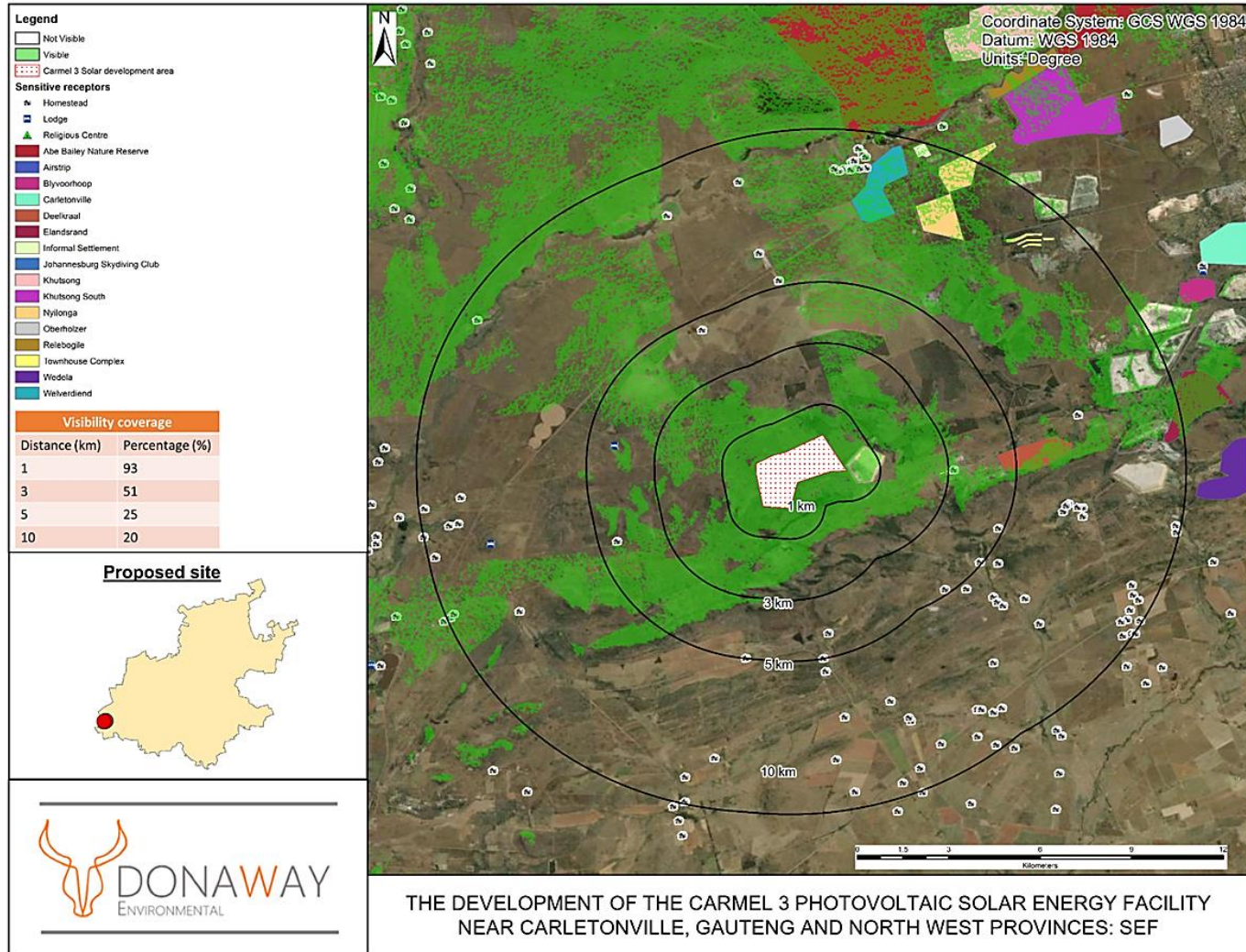
Table 5.6. below reflects the visibility rating in terms of proximity on sensitive receptors from the Solar Energy Facility (SEF) within a 10 km radius.

**Table 5.6:** ZTV visibility rating in terms of proximity from the SEF

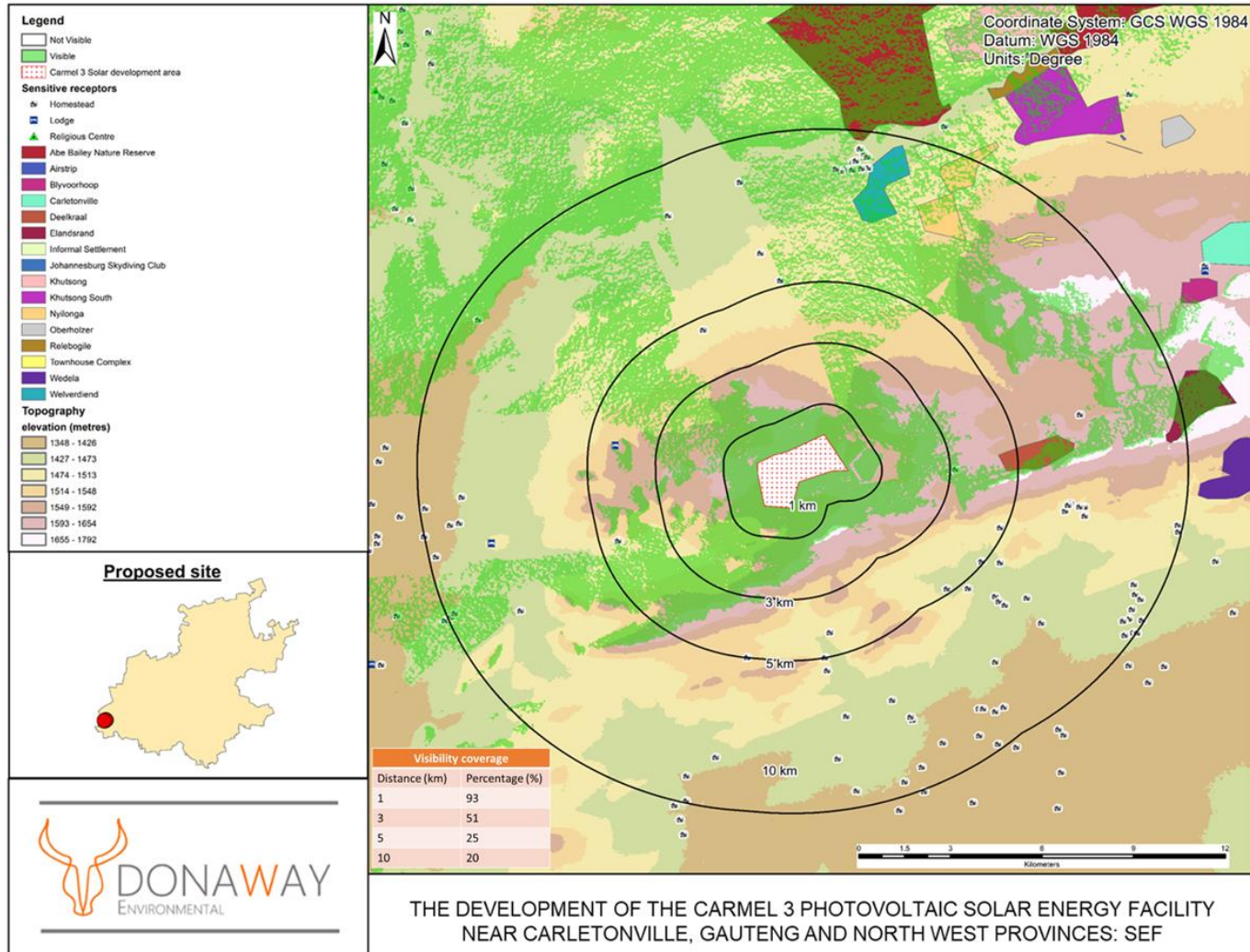
Radius	Visual Receptors	Visibility rating in terms of proximity
0-1km	No potential sensitive visual receptors are present within the radius. <b>Coverage: 93%</b>	Very High
1-3km	No potential sensitive visual receptors are present within the radius. <b>Coverage: 51%</b>	High
3-5km	<ul style="list-style-type: none"> <li>- Two homesteads on farms.</li> <li>- One lodging facility.</li> <li>- Deelkraal.</li> <li>- R501 regional road.</li> </ul> <b>Coverage: 25%</b>	Medium
5-10km	<ul style="list-style-type: none"> <li>- 16 homesteads on farms.</li> <li>- R501 regional road.</li> <li>- Buffelsdoorn road.</li> <li>- Welverdiend.</li> <li>- Deelkraal.</li> <li>- Elandsrand.</li> </ul> <b>Coverage: 20%</b>	Low

Refer to Figures 5.17 and 5.18: Zone of Theoretical Visibility (ZTV). These maps indicate all areas that are in direct line of site of the proposed development up to a distance of 10 km as per Table 5.6. above.





**Figure 5.17:** Zone of Theoretical Visibility (ZTV) for the Solar Energy Facility (SEF), satellite view



**Figure 5.18:** Zone of Theoretical Visibility (ZTV) for the Solar Energy Facility (SEF), topography view

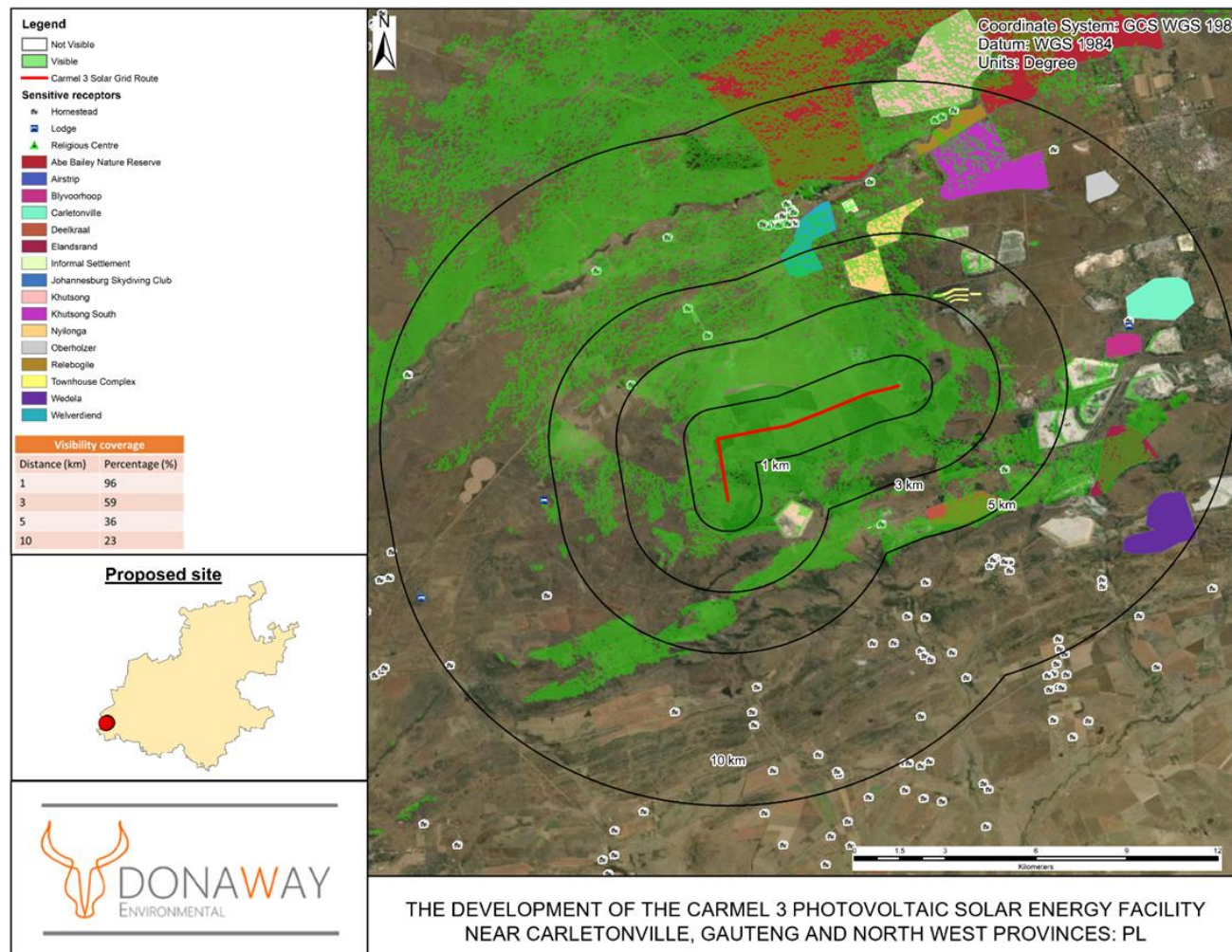
Table 5.7. below reflects the visibility rating in terms of proximity on sensitive receptors from the Powerline (PL) within a 10 km radius.

**Table 5.7: ZTV rating in terms of proximity from the PL**

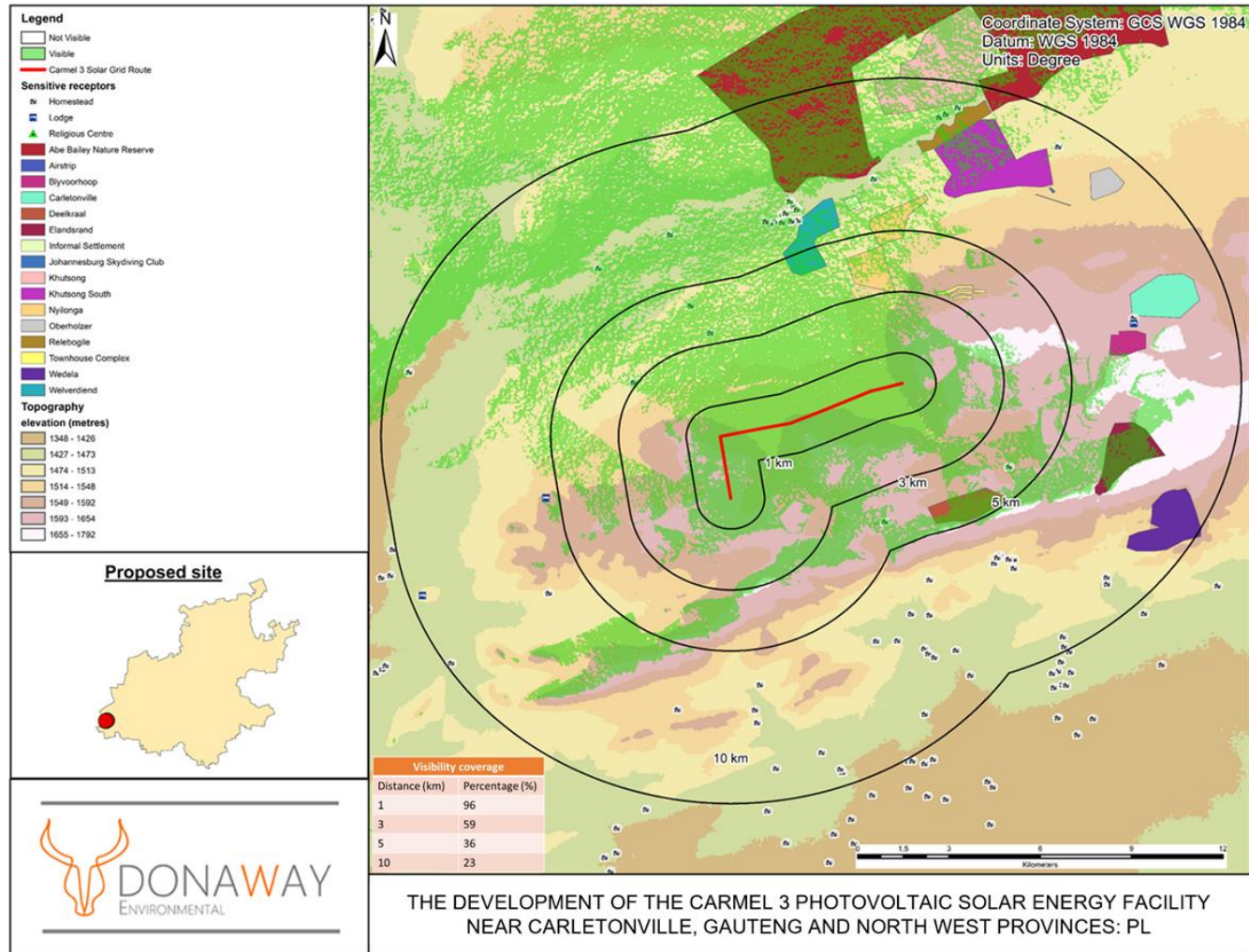
Radius	Visual Receptors	Visibility rating in terms of proximity
0-1km	<ul style="list-style-type: none"> <li>- Buffelsdoorn road.</li> </ul> <p><b>Coverage: 96%</b></p>	Very High
1-3km	<ul style="list-style-type: none"> <li>- Buffelsdoorn road.</li> <li>- R501 regional road.</li> </ul> <p><b>Coverage: 59%</b></p>	High
3-5km	<ul style="list-style-type: none"> <li>- Five homesteads on farms.</li> <li>- R501 regional road.</li> <li>- Buffelsdoorn road.</li> <li>- Welverdiend.</li> <li>- Deelkraal.</li> </ul> <p><b>Coverage: 36%</b></p>	Medium
5-10km	<ul style="list-style-type: none"> <li>- 17 homesteads on farms and smallholdings.</li> <li>- Welverdiend.</li> <li>- Khutsong.</li> <li>- Abe Bailey Nature Reserve.</li> <li>- Elandsrand.</li> <li>- R501 regional road.</li> </ul> <p><b>Coverage: 23%</b></p>	Low

Refer to Figures 5.19 and 5.20: Zone of Theoretical Visibility (ZTV). These maps indicate all areas that are in direct line of site of the proposed development up to a distance of 10 km as per Table 5.7. above.





**Figure 5.19:** Zone of Theoretical Visibility (ZTV) for the Powerline (PL), satellite view



**Figure 5.20:** Zone of Theoretical Visibility (ZTV) for the Powerline (PL), topography view

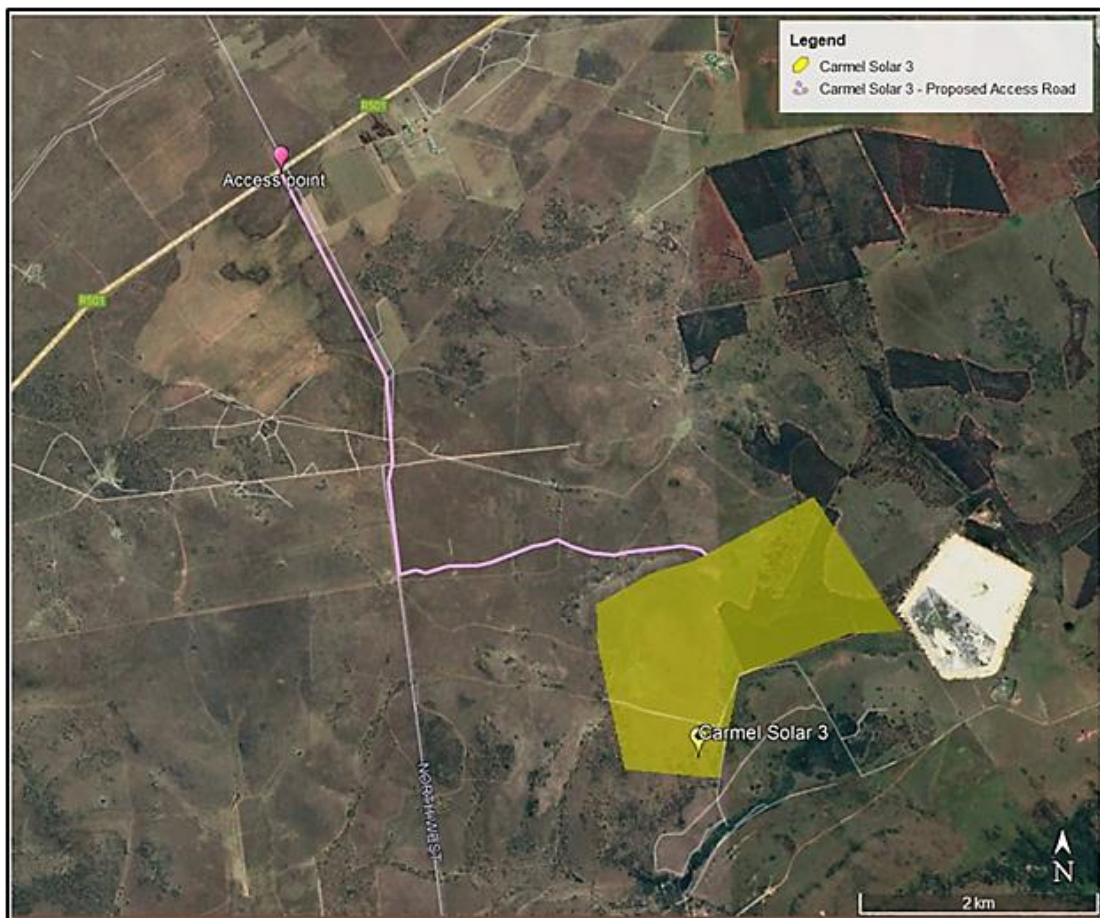


The only receptors likely to be impacted by the proposed development are the nearby property owners and nearby roads. However, a large part of the visual landscape is still reflecting a farming and intensive mining landscape with a much lower visual quality.

#### 5.4.4 Traffic Consideration

##### 5.4.4.1 Access Points

According to the Traffic Impact Study (Appendix E9), access to the project site will need to be established, from the R501 Regional Road. The assessment of possible accesses took into consideration any existing access gates and access spacing requirements, required sight lines and road safety considerations (Figure 5.21). The recommended access point follows existing farm roads to the site from the R501.



**Figure 5.21:** Aerial view of recommended access point for Carmel Solar 3

#### **General**

The access roads leading from the recommended access point options need to be wide enough for heavy vehicles and large construction vehicles to navigate (minimum width of 8 m should be kept). The radii at the bends at the access points need to be large enough to allow for all construction vehicles to turn safely. It is further recommended that the access points be security controlled during the construction phase. Sight distances are deemed good; however, any sight line limitations will need to be addressed (i.e., cutting back of trees or shrubbery that obstruct a clear view of the road ahead).

### ***Internal Roads***

The geometric design and layout for the internal roads from the recommended access points need to be established at detailed design stage. Existing structures and services, such as drainage structures, signage and pipelines will need to be evaluated if impacting on the roads. It needs to be ensured that the gravel sections remain in good condition and will need to be maintained during the additional loading of the construction phase and then reinstated after construction is completed.

The geometric design constraints encountered due to the terrain should be taken into consideration by the geometric designer. Preferably, the internal roads need to be designed with smooth, relatively flat gradients (recommended to be no more than 8%) to allow a larger transport load vehicle to ascend to the respective laydown areas.

From a transport engineering perspective, the proposed development alternatives (i.e., electrical infrastructure compound location alternatives and the technology options for the BESS) are acceptable as they do not have any impact on the traffic on the surrounding road network.

### **5.4.5 Description of the Socio-Economic Environment**

The socio-economic environment is described with specific reference to social, economic, heritage and cultural aspects.

#### **5.4.5.1 Socio-Economic Conditions**

According to the Social Impact Assessment (Appendix E8), the project is located within the Gauteng and North West provinces.

#### ***Gauteng Province:***

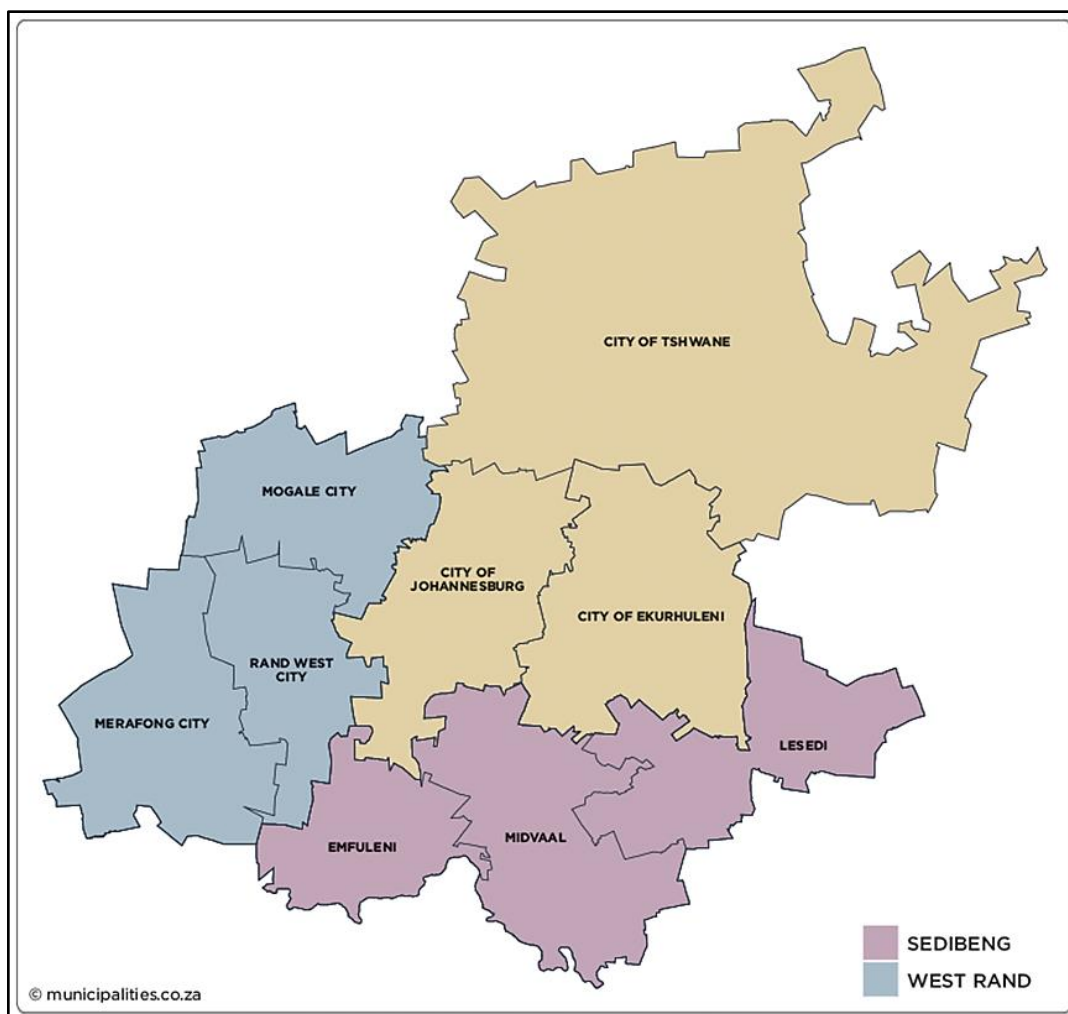
Gauteng is the smallest of South Africa's provinces, covering an area of 18 178km<sup>2</sup> or approximately 1.4% of the total surface area of South Africa. It is bordered by the Gauteng, North West, Limpopo and Mpumalanga provinces. While being the smallest province, it is also the most populous, being home to 13 399 725 people – 24.1% of the national population. Gauteng lies on the highest part of the interior plateau on the rolling plains of South Africa's Highveld.

Its capital is Johannesburg, and it also contains the city of Pretoria, as well as the East Rand, West Rand and Vaal areas.

Gauteng continues to serve as the economic engine room of the country and the subcontinent, responsible for over 34.8% of the country's GDP. Gauteng is the powerhouse of South Africa and the heart of its commercial business and industrial sectors. The most important sectors contributing to GDP are finance, real estate and business services; manufacturing; and general government services. Gauteng is also the financial services capital of Africa. More than 70 foreign banks have their head offices here, as do at least the same number of South African banks, stockbrokers and insurance giants.

The major gold and diamond mining houses all have their headquarters in Johannesburg, the biggest being Anglo American and De Beers. Gold mining constitutes 80% of Gauteng’s mineral production output.

Gauteng is divided into three metropolitan municipalities, the City of Ekurhuleni, City of Johannesburg and City of Tshwane Metropolitan Municipalities, as well as two district municipalities, which are further subdivided into six local municipalities.



**Figure 5.22:** Map showing the DMs of the Gauteng Province (Source: [www.municipalities.co.za](http://www.municipalities.co.za))

***West Rand District Municipality***

The West Rand District Municipality is a Category C municipality located in the west of the Gauteng Province. The West Rand extends from Randfontein (the seat of the district) in the west to Roodepoort in the east, and includes the town of Krugersdorp. It is bordered by Bojanala Platinum to the north-west, City of Tshwane to the north-east, City of Johannesburg to the east, Sedibeng to the south-east, and Dr Kenneth Kaunda to the south-west. It comprises three local municipalities: Merafong, Mogale and Rand West Cities.

The municipality is situated relatively closely to the hub of economic activity in Gauteng, and is traversed by major national roads, namely the N12 and N14. Its main contribution lies



primarily within the mining sector, however, areas such as Krugersdorp fulfil a residential function for many people working in Johannesburg. The West Rand remains the poorest region contributing to Gauteng's GDP.

The Cradle of Humankind falls under the jurisdiction of Mogale City and Merafong City, and forms part of the World Heritage Site.

The main economic sectors include Manufacturing (22%), mining (19%), community services (19%), finance (16%), trade (10%), transport (6%), construction (4%).

In 2011 the Municipality had a population of 820 995 with a dependency ratio of 39.2. By 2016 the population has increased to 838 594 and the dependency ratio was reduced to 39.4.

### ***Merafong City Local Municipality***

The Merafong City Local Municipality is a Category B municipality situated within the West Rand District in the Gauteng Province. It is the largest of three municipalities in the district, making up almost half of its geographical area. It is situated about 65km from Johannesburg and is serviced by a number of major roads, including the N12 from Johannesburg to Cape Town and the N14, which is the main road between Gauteng and Mahikeng (previously Mafikeng) via Ventersdorp. Its boundaries enclose some of the richest gold mines in the world.

Formerly a cross-border municipality, the entire municipality was transferred to the North West Province following the abolition of cross-border municipalities by an amendment to the South African Constitution in 2005. The municipality was part of the North West Province from 2005 to 2009, when it was reincorporated into the Gauteng Province by another amendment to the Constitution, following often violent protests in the township of Khutsong.

Merafong's historical development is closely knit with the discovery of rich gold deposits in the early 1930s. Fochville is the oldest town in the region and was declared a town in 1951. The town Carletonville was named after Guy Carleton Jones, an engineer from the Gold Fields Ltd mining company, who played a prominent role in the discovery of the West Wits gold field, of which Carletonville forms a part. The mining company decided, in November 1946, to establish the town. Carletonville was proclaimed in 1948 and attained Town Council Status on 1 July 1959.

Wedela is situated between Western Deep Levels and Elandsrand mine. The town's name is derived from the prefixes of the two mines: the 'Wed-' from Western Deep Levels and the '-ela' from Elandsrand. Wedela was established as a mining village in December 1978 by Harry Oppenheimer, and municipal status was granted to the town on 1 January 1990.

There are three towns in the municipality, namely Carletonville, Fochville, Wedela

The main economic sectors in the municipality are Mining (50.7%), trade (9.7%), finance and business services (9.9%), community services (9.2%), general government (9.1%)

### ***North West Province:***

North West lies in the north of South Africa on the Botswana border, fringed by the Kalahari Desert in the west, Gauteng province to the east and the Free State to the south. It covers an area of 104 882km<sup>2</sup> and has a population of 3 748 436. Much of the province consists of flat

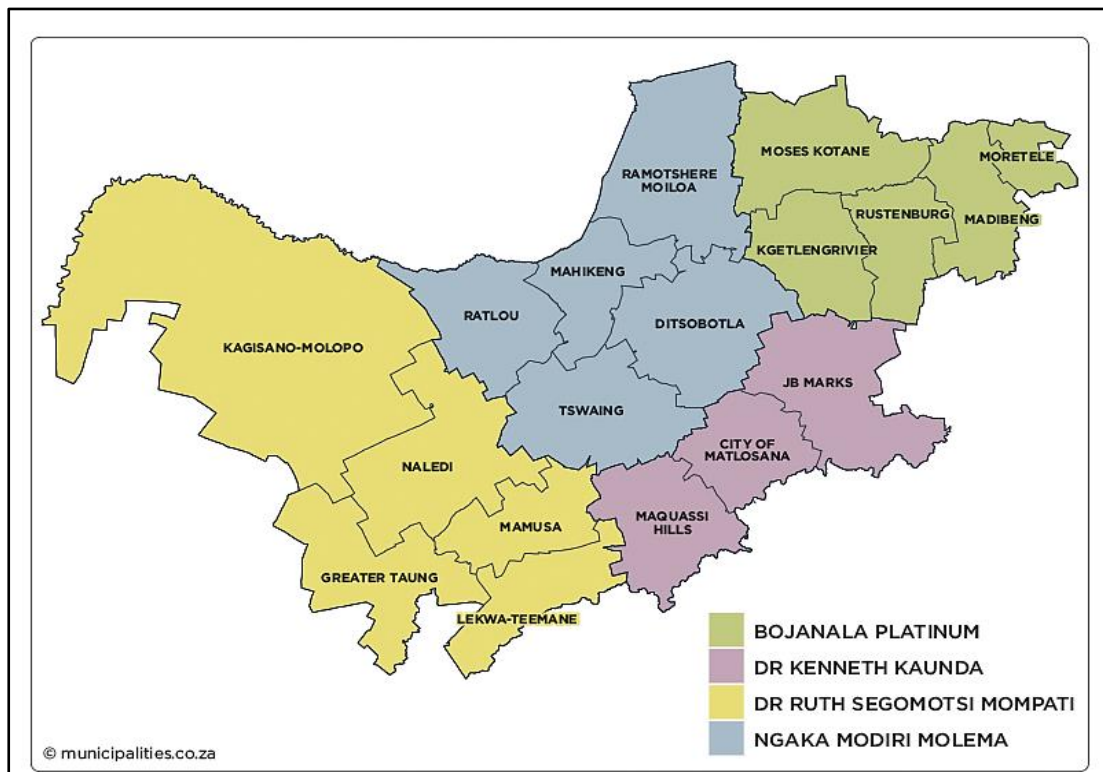
areas of scattered trees and grassland. The Vaal River flows along the southern border of the province.

Mahikeng (previously Mafikeng) is the capital. The city lies near the Botswana border and forms a single urban area with its neighbouring town, Mmabatho. Potchefstroom and Klerksdorp are the biggest cities in the province. Other main towns are Brits, Rustenburg, Klerksdorp and Lichtenburg.

Most economic activity is concentrated in the southern region between Potchefstroom and Klerksdorp, as well as Rustenburg and the eastern region. Mining is the major contributor to the North West economy and represents almost a quarter of South Africa’s mining industry as a whole. The Rustenburg and Brits districts produce more platinum than any other single area in the world. North West also produces a quarter of South Africa’s gold, as well as granite, marble, fluorspar and diamonds. North West has a number of major tourist attractions, including the internationally famous Sun City, the Pilanesberg National Park, the Madikwe Game Reserve and the Rustenburg Nature Reserve.

North West is well known for cattle farming, while the areas around Rustenburg and Brits are fertile, mixed-crop farming land. Maize and sunflowers are the most important crops, and the province is the major producer of white maize in the country.

North West is divided into four district municipalities, which are further subdivided into 18 local municipalities.



**Figure 5.23:** Map showing the DMs of the North West Province (Source: www.municipalities.co.za)

### ***Dr Kenneth Kaunda District Municipality***

The Dr Kenneth Kaunda District Municipality is a Category C municipality in the North West Province. It is located 65km south-west of Johannesburg and borders the Gauteng Province on that side. It is the smallest district in the province, making up 14% of its geographical area. The municipality consists of three local municipalities: JB Marks, City of Matlosana and Maquassi Hills.

It is a region with a rich and diverse natural and cultural heritage, with the potential for sustained economic growth. The region is home to some of the most prominent gold mines in the world and one of the oldest meteor impact sites in the world.

The district is serviced by a number of primary roads, with the N12 Treasure Corridor forming the main development axis in the district and serving as a potential concentration point for future industrial, commercial and tourism development

The DM covers an area of 14 671km<sup>2</sup> and consists of the Following towns: Hartbeesfontein, Klerksdorp, Leeudoringstad, Makwassie, Orkney, Potchefstroom, Stilfontein, Ventersdorp, Witpoort, Wolmaransstad

The main economic sectors include Community services (28.7%), trade, (23.2%), finance (13.1%), construction (8.3%), manufacturing (8.2%), agriculture (7.6%), mining (6.1%), transport and communications (4.3%)

In 2011 the Municipality had a population of 695 933 with a dependency ratio of 51.1. By 2016 the population has increased to 742 821 and the dependency ratio was reduced to 51.9.

### ***JB Marks Local Municipality***

The JB Marks Local Municipality is a Category B municipality situated within the Dr Kenneth Kaunda District in the North West Province. It is the largest municipality of three in the district, making up almost half its geographical area. It was established by the amalgamation of the Ventersdorp and Tlokwe City Council Local Municipalities in August 2016. The N12 route that connects Johannesburg and Cape Town via the city of Kimberley runs through the municipality. The main railway route from Gauteng to the Northern and Western Cape also runs through one of the municipality's main cities, Potchefstroom. The city is 145km south-east of OR Tambo International Airport but has its own airfield, which can accommodate bigger aircraft and was formerly a military air base. The LM consists of two towns namely: Potchefstroom and Ventersdorp and covers an area of 6 398km<sup>2</sup>.

Gold mining is the dominant economic activity in the district, with Potchefstroom and Ventersdorp being the only exceptions. While Ventersdorp to the north-west of Potchefstroom focuses on agricultural activity, Potchefstroom's economic activity is driven by services and manufacturing. A big role-player in the provision of services in Potchefstroom is the world-class North-West University, which has its main campus in Potchefstroom.

Potchefstroom's industrial zone has many companies, focusing mainly on the industries of steel, food and chemicals, with big entities such as King Korn, Kynoch, Naschem and the Soya Protein Process (SPP) company. Within the city centre, the infrastructure of Potchefstroom

supports roughly 600 businesses. The main economic sectors in the municipality are Agriculture, community services, manufacturing, trade, finance, transport, mining.

## 5.5 SITE SELECTION MATRIX

Due to the nature of the proposed development, the location of the solar PV facility is largely dependent on technical and environmental factors such as solar irradiation, climatic conditions, topography of the site, access to the grid and capacity of the grid. Studies of solar irradiation worldwide indicate that the Gauteng and North West Province has a high potential for the generation of power from solar.

The receptiveness of the site to PV Development includes the presence of optimal conditions for the siting of a solar energy facility due to high irradiation values and optimum grid connection opportunities (i.e., the grid connection points are located within a limited number of affected properties which minimizes the length of power line development and consolidates the overall impacts and disturbance of the project within the affected property). The Remaining Extent, Portion 1 and Portion 3 of the Farm Kleinfontein No. 141; Portion 4 of the Farm Turffontein No. 126; and Portions 1, 11, 23 and 28 of the Farm Doornfontein No. 118, where the project is proposed to be located is considered favorable and suitable from a technical perspective due to the following characteristics:

- Climatic conditions: Climatic conditions determine if the project will be viable from an economic perspective as the solar PV facility is directly dependent on the annual direct solar irradiation values of a particular area. Gauteng and North West Provinces receives high averages of direct normal and global horizontal irradiation, daily. This is an indication that the regional location of the project includes a low number of rainy days and a high number of daylight hours experienced in the region. Global Horizontal Radiation of ~2118 kWh/m<sup>2</sup>/year is relevant in the area.
- Topographic conditions: The surface area on which the proposed facility will be located has a favourable level topography, which facilitates work involved with construction and maintenance of the facility and ensures that shadowing on the panels do not occur. The topographic conditions, which are favourable, minimizes the significance of the impact that will occur during the clearing and leveling of the site for the construction activities.
- Extent of the site: A significant portion of land is required to evacuate the prescribed 240 MW and space is a constraining factor in PV facility installations. Provision was made to assess a larger area than is required for the facility to make provision for any other environmental or technical constraints that may arise and avoiding those areas. Larger farms are sought after to make provision for any constraints imposed by the Department of Agriculture on the extent of land that may be used for such facilities per farm, as well as the opportunities presented for the avoidance of sensitive environmental features present. The Remaining Extent, Portion 1 and Portion 3 of the Farm Kleinfontein No. 141; Portion 4 of the Farm Turffontein No. 126; and Portions 1, 11, 23 and 28 of the Farm Doornfontein No. 118, and the development footprint assessed therein is considered to provide an opportunity for the successful construction and operation of a solar PV facility with a capacity of 240 MW, as well as opportunities for the avoidance and mitigation of impacts on the affected environment and sensitive environmental features.

- Site availability and access: The land is available for lease by the developer. Reluctant farm owners or farmers over capitalizing hamper efforts to find suitable farms. Access will be obtained via existing farm roads via the R501 Regional Road.
- Grid connection: In order for the PV facility to connect to the national grid the facility will have to construct an on-site substation, Eskom switching station and a power line from the project site to connect to the Eskom grid. Available grid connections are becoming scarce and play a huge role when selecting a viable site.
- Environmental sensitivities: From an environmental perspective the proposed site is considered highly desirable due to limited environmental sensitivities in terms of geology, and soils, agricultural potential, vegetation and landscape features, climate, biodiversity and the visual landscape – refer to Section 5.3.1 of this report. The area proposed for development consists of land used for agriculture and intensive mining activities. However, parts of the site are within a CBA or an ESA.

It is evident from the discussion above that the Remaining Extent, Portion 1 and Portion 3 of the Farm Kleinfontein No. 141; Portion 4 of the Farm Turffontein No. 126; and Portions 1, 11, 23 and 28 of the Farm Doornfontein No. 118, may be considered favourable and suitable in terms of the site and environmental characteristics. As mentioned previously, no alternative areas on the property have been considered for the placement of the development footprint as the assessed development footprint avoids areas that are under cultivation within the affected property. The development footprint of this project will cover a significant portion of the farm; however, provision will be made to exclude any sensitive areas from the facility layout to be developed within the development footprint. This will be assessed in detail at the EIA phase.

## **5.6 CONCLUDING STATEMENT ON ALTERNATIVES**

When considering the information provided by the specialists with regards to the site selection criteria, the site is identified as preferred due to the fact that the opportunities presented on the site to develop the project in such a way which avoids the areas and features (including the associated buffers) of environmental sensitivity.

Therefore, development of the 240 MW Carmel Solar 3 PV Facility on Remaining Extent, Portion 1 and Portion 3 of the Farm Kleinfontein No. 141; Portion 4 of the Farm Turffontein No. 126; and Portions 1, 11, 23 and 28 of the Farm Doornfontein No. 118, is the preferred option.

The draft layout considers technical constraints as a part of this scoping process. Where specific features of environmental sensitivity are identified by the independent specialists as part of the Scoping Phase, these areas and the associated required buffers will be considered by the developer during the EIA phase to ensure that the facility layout is appropriate considering the sensitive features present. Refer to Figure J for the draft layout proposed for development.



## 6 DESCRIPTION OF THE IMPACTS AND RISKS

This section aims to address the following requirements of the regulations:

**Appendix 2.** (2) A scoping report (...) must include-

(v) the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts-

(aa) can be reversed;

(bb) may cause irreplaceable loss of resources; and

(cc) can be avoided, managed or mitigated;

(vi) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;

(vii) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;

(viii) the possible mitigation measures that could be applied and level of residual risk;

### 6.1 SCOPING METHODOLOGY

The contents and methodology of the scoping report aims to provide, as far as possible, a user-friendly analysis of information to allow for easy interpretation.

- Checklist (see section 6.1.1): The checklist consists of a list of structured questions related to the environmental parameters and specific human actions. They assist in ordering thinking, data collection, presentation and alert against the omission of possible impacts.
- Matrix (see section 6.1.2): The matrix analysis provides a holistic indication of the relationship and interaction between the various activities, development phases and the impact thereof on the environment. The method aims at providing a first order cause and effect relationship between the environment and the proposed activity. The matrix is designed to indicate the relationship between the different stressors and receptors which leads to specific impacts. The matrix also indicates the specialist studies that have been conducted to address potentially the most significant impacts.

#### 6.1.1 Checklist Analysis

The independent consultant conducted a site visit on 12 October 2022. The site visit was conducted to ensure a proper analysis of the site-specific characteristics of the study area. Table 6.1 provides a checklist, which is designed to stimulate thought regarding possible consequences of specific actions and so assist scoping of key issues. It consists of a list of

structured questions related to the environmental parameters and specific human actions. They assist in ordering thinking, data collection, presentation and alert against the omission of possible impacts. The table highlights certain issues, which are further analysed in matrix format in section 6.2.

**Table 6.1:** Environmental checklist

QUESTION	YES	NO	Un-sure	Description
<b>1. Are any of the following located on the site earmarked for the development?</b>				
I. A river, stream, dam or wetland	X			A Channelled Valley Bottom wetland has been found to be located within 500m of the project site. However, the wetland does not encroach onto the affected property.
II. A conservation or open space area	X			According to the Terrestrial Biodiversity Assessment, parts of the site are within a Critical Biodiversity Area or an Ecological Support Area.
III. An area that is of cultural importance		X		No sites, features or objects of cultural significance were identified.
IV. Site of geological significance		X		None.
V. Areas of outstanding natural beauty		X		None.
VI. Highly productive agricultural land		X		None.
VII. Floodplain		X		None.
VIII. Indigenous Forest		X		None.
IX. Grass land	X			According to the Terrestrial Biodiversity Assessment, the site is currently mostly a combination of grassland and exotic woodlots
X. Bird nesting sites		X		The Avifauna Scoping Assessment (refer to Appendix E3) does not make any reference to nesting sites on the area earmarked for the development.
XI. Red data species		X		The Avifauna Scoping Assessment (refer to Appendix E3) did not record any Red Data Species on site but indicated that some species of conservation concern may occur on site

XII. Tourist resort		X		None.
<b>2. Will the project potentially result in potential?</b>				
I. Removal of people		X		None.
II. Visual Impacts	X			The VIA (refer to Appendix E4) confirmed that the significance of the visual impact will be a "Negative Low Impact". The only receptors likely to be impacted by the proposed development are the nearby property owners and nearby roads.
III. Noise pollution	X			Construction activities will result in the generation of noise over a period of 18-24 months. The noise impact is unlikely to be significant.
IV. Construction of an access road	X			An access point has proposed off the R501 Regional Road.
V. Risk to human or valuable ecosystems due to explosion/fire/ discharge of waste into water or air.		X		None.
VI. Accumulation of large workforce (>50 manual workers) into the site.	X			Approximately 500 employment opportunities will be created during the peak construction phase and 50 employment opportunities during the operation phase of the PV facility.
VII. Utilisation of significant volumes of local raw materials such as water, wood etc.	X			The estimated maximum amount of water required during the facility's 20 years of production is approximately 9547kl per annum.
VIII. Job creation	X			Approximately 500 employment opportunities will be created during the peak construction phase and 50 employment opportunities during the operation phase of the PV facility.

IX. Traffic generation	×			It was estimated that approximately 242 daily site trips will be made which comprises of solar component delivery; staff transport; and material delivery.
X. Soil erosion	×			The site will need to be cleared or graded to a limited extent, which may potentially result in a degree of dust being created, increased runoff and potentially soil erosion. The time that these areas are left bare will be limited to the construction phase, since vegetation will be allowed to grow back after construction.
XI. Installation of additional bulk telecommunication transmission lines or facilities		×		None.
<b>3. Is the proposed project located near the following?</b>				
I. A river, stream, dam or wetland	×			A Channelled Valley Bottom wetland has been found to be located within 500m of the project site. However, the wetland does not encroach onto the affected property.
II. A conservation or open space area	×			According to the Terrestrial Biodiversity Assessment, parts of the site are within a Critical Biodiversity Area or an Ecological Support Area.
III. An area that is of cultural importance		×		None.
IV. A site of geological significance		×		None.
V. An area of outstanding natural beauty		×		None.
VI. Highly productive agricultural land		×		None.
VII. A tourist resort		×		None.
VIII. A formal or informal settlement	×			The town of Carletonville is located approximately 18 km northeast of the proposed development.

### 6.1.2 Matrix Analysis

The matrix describes the relevant listed activities, the aspects of the development that will apply to the specific listed activity, a description of the environmental issues and potential

impacts, the significance and magnitude of the potential impacts and possible mitigation measures. The matrix also highlights areas of particular concern (see Table 6.2) for more in-depth assessment during the EIA process. An indication is provided of the specialist studies being conducted and which informed the initial assessment. Each cell is evaluated individually in terms of the nature of the impact, duration and its significance – should no mitigation measures be applied. This is important since many impacts would not be considered insignificant if proper mitigation measures were implemented.

In order to conceptualise the different impacts, the matrix specify the following:

- **Stressor:** Indicates the aspect of the proposed activity, which initiates and cause impacts on elements of the environment.
- **Receptor:** Highlights the recipient and most important components of the environment affected by the stressor.
- **Impacts:** Indicates the net result of the cause-effect between the stressor and receptor.
- **Mitigation:** Impacts need to be mitigated to minimise the effect on the environment.

Please refer to **Appendix E** (specialist studies) for a more in-depth assessment of the potential environmental impacts.

**Table 6.2:** Matrix analysis

For ease of reference the significance of the impacts is colour-coded as follow:

Low significance		Medium significance		High significance		Positive impact	
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LISTED ACTIVITY (The Stressor)	ASPECTS OF THE DEVELOPMENT /ACTIVITY	POTENTIAL IMPACTS		SIGNIFICANCE AND MAGNITUDE OF POTENTIAL IMPACTS							MITIGATION OF POTENTIAL IMPACTS			SPECIALIST STUDIES / INFORMATION	
		Receptors	Impact description / consequence	Minor	Major	Extent	Duration	Probability	Reversibility	Irreplaceable loss of resources	Possible Mitigation	Possible mitigation measures	Level of residual risk		
<b>CONSTRUCTION PHASE</b>															
<p><u>Activity 11(i) (GN.R. 327):</u> “The development of facilities or infrastructure for the transmission and distribution of electricity outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts.”</p> <p><u>Activity 12(ii)(a)(c) (GN.R. 327):</u> “The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (a) within a watercourse or (c) within 32 meters of a watercourse measured from the edge of a watercourse.”</p> <p><u>Activity 19 (GNR 327):</u> “The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse.”</p>	<p><u>Site clearing and preparation</u></p> <p>Certain areas of the site will need to be cleared of vegetation and some areas may need to be levelled.</p> <p><u>Civil works</u></p> <p>The main civil works are:</p> <ul style="list-style-type: none"> <li>• Terrain levelling if necessary– Levelling will be minimal as the potential site chosen is relatively flat.</li> <li>• Laying foundation- The structures will be connected to the ground through cement pillars, cement slabs or metal screws. The exact method will depend on the detailed geotechnical analysis.</li> <li>• Construction of access and inside roads/paths – existing paths will be used where reasonably possible. Additionally, the turning</li> </ul>	BIOPHYSICAL ENVIRONMENT	Indigenous natural vegetation	<ul style="list-style-type: none"> <li>• Loss, degradation or fragmentation of vegetation through direct clearing</li> </ul>	-	S	P	D	IR	SL	Yes	-	See Table 6.3	M	Terrestrial Biodiversity Impact Assessment (Appendix E2)
			Air	<ul style="list-style-type: none"> <li>• Air pollution due to the increase of traffic of construction vehicles and the undertaking of construction activities.</li> </ul>	-	S	S	D	CR	NL	Yes	-	Dust suppression measures must be implemented for heavy vehicles such as wetting of gravel roads on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers.	L	-
			Geology	<ul style="list-style-type: none"> <li>• Collapsible soil.</li> <li>• Seepage.</li> <li>• Active soil (high soil heave).</li> <li>• Erodible soil.</li> <li>• Hard/compact geology. If the bedrock occurs close to surface it may present problems when driving solar panel columns.</li> </ul>	-	-	S	S	Pr	CR	NL	Yes	-	The most effective mitigation will be the minimisation of the project footprint by using the existing roads in the area and not create new roads to prevent other	L

<p><u>Activity 24 (ii) (GN.R 327):</u> “The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters.”</p> <p><u>Activity 27 (GN.R. 327):</u> “The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation...”</p> <p><u>Activity 28(ii) (GN.R. 327):</u> “Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare.”</p> <p><u>Activity 56 (ii) (GN.R 327):</u> “The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre (ii) where no reserve exists, where the existing road is wider than 8 metres...”</p> <p><u>Activity 1 (GN.R. 325):</u> “The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more...”</p> <p><u>Activity 15 (GN.R. 325):</u> “The clearance of an area of 20</p>	<p>circle for trucks will also be taken into consideration.</p> <p><u>Transportation and installation of PV panels into an Array</u></p> <p>The panels are assembled at the supplier’s premises and will be transported from the factory to the site on trucks. The panels will be mounted on metal structures which are fixed into the ground either through a concrete foundation or a deep-seated screw.</p> <p><u>Wiring to the Central Inverters</u></p> <p>Sections of the PV array will be wired to central inverters. The inverter is a pulse width mode inverter that converts direct current (DC) electricity to alternating current (AC) electricity at grid frequency.</p>			<ul style="list-style-type: none"> <li>The presence of undermined ground.</li> <li>Instability due to soluble rock.</li> <li>Steep slopes or areas of unstable natural slopes.</li> <li>Areas subject to seismic activity.</li> </ul>									<p>areas also getting compacted.</p> <ul style="list-style-type: none"> <li>Retention of vegetation where possible to avoid soil erosion.</li> </ul>		
		Existing services infrastructure		<ul style="list-style-type: none"> <li>Generation of waste that need to be accommodated at a licensed landfill site.</li> <li>Generation of sewage that need to be accommodated by the local sewage plant.</li> <li>Increase in construction vehicles on existing roads.</li> </ul>	-	L	S	D	PR	ML	Yes	-		L	Confirmation from the Local Municipality
		Groundwater		<ul style="list-style-type: none"> <li>Pollution due to construction vehicles and the storage and handling of dangerous goods.</li> </ul>	-	S	S	Pr	CR	ML	Yes	<ul style="list-style-type: none"> <li>A groundwater monitoring programme (quality and groundwater levels) should be designed and installed for the site.</li> <li>Monitoring boreholes should be securely capped, and must be fitted with a suitable sanitary seal to prevent surface water flowing down the outside of the casing.</li> <li>Full construction details of monitoring boreholes must be recorded when they are drilled.</li> <li>Sampling of monitoring boreholes should be done according to recognised standards.</li> </ul>	L	-	



<p>hectares or more of indigenous vegetation..."</p> <p><u>Activity 4 (c)(iv) (GN.R 324):</u> "The development of a road wider than 4 metres with a reserve less than 13,5 metres within (c) the Gauteng province, (iv) Sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans."</p> <p><u>Activity 10 (c)(iv) (GN.R 324):</u> "The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (c) the Gauteng province, (iv) Sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans."</p> <p><u>Activity 12 (c)(ii) (GN.R 324):</u> "The clearance of an area of 300 square metres or more of indigenous vegetation (c) in the Gauteng Province, (ii) within Critical Biodiversity Areas or Ecological Support Areas identified in the Gauteng Conservation Plan or bioregional plans."</p> <p><u>Activity 14(ii)(c)(c)(iv) (GN.R 324):</u> "The development of (ii) infrastructure or structures</p>			Aquatic Ecology	<ul style="list-style-type: none"> <li>Loss of habitat containing protected species or Species of Special Concern</li> <li>Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones.</li> <li>Loss can also include a functional loss, through change in vegetation type via alien encroachment, reducing aquatic biodiversity.</li> </ul>	-		L	L	Pr	IR	NL	Yes	-	See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)
			Aquatic Ecology	<ul style="list-style-type: none"> <li>Loss of CBAs or potential areas with conservation potential</li> <li>Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones and have been included in any Critical Biodiversity Areas</li> </ul>	-		L	L	Pr	IR	NL	Yes	-	See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)
			Aquatic Ecology	<ul style="list-style-type: none"> <li>Potential spread of alien vegetation</li> <li>During construction, complete clearing of the PV panel areas, as well any ancillary structures (offices and substations) will be required. This disturbance then allows for the alien species to colonise the soils, if left unmanaged.</li> </ul>	-		L	L	Pr	IR	NL	Yes	-	See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)

<p>with a physical footprint of 10 square metres or more, where such development occurs (c) within 32 metres of a watercourse, measured from the edge of a watercourse (c) within the Gauteng Province, within (iv) sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”</p> <p><u>Activity 18 (c)(iv):</u> “The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (c) in the Gauteng Province within (iv) sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”</p> <p><u>Activity 18 (h)(v):</u> “The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (h) in the North West Province within (v) Critical Biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority.”</p>			Aquatic Ecology	<ul style="list-style-type: none"> <li>Loss of riparian and or wetland habitat</li> <li>During construction, complete clearing of the PV panel areas, as well any ancillary structures (offices and substations) will be required, which may impact the aquatic function or any corridors or connections between aquatic systems. However, these areas can be avoided by the proposed layout.</li> </ul>	-		L	L	Pr	IR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)
			Aquatic Ecology	<ul style="list-style-type: none"> <li>Changes to the hydrological regime and increase potential for erosion</li> <li>Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones and have been included in any Critical Biodiversity Areas</li> </ul>	-		L	L	Pr	IR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)
			Aquatic Ecology	<ul style="list-style-type: none"> <li>Changes to surface water quality characteristics</li> <li>During construction or decommissioning, earthworks will expose and mobilise earth materials, and a number of materials as well as chemicals will be imported and used on site and may end up in the surface water, including soaps, oils, grease and fuels, human wastes, cementitious wastes, paints and solvents, etc.</li> </ul>	-		L	L	Pr	IR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)

				<ul style="list-style-type: none"> <li>Any spills during transport or while works area conducted in proximity to a watercourse has the potential to affect the surrounding biota.</li> <li>This can result in possible deterioration in aquatic ecosystem integrity and species diversity.</li> </ul>														
			General Environment (risks associated with BESS)	<ul style="list-style-type: none"> <li>Mechanical breakdown / Exposure to high temperatures</li> <li>Fires, electrocutions and spillage of toxic substances into the surrounding environment.</li> <li>Spillage of hazardous substances into the surrounding environment.</li> <li>Soil contamination – leachate from spillages which could lead to an impact of the productivity of soil forms in affected areas.</li> <li>Water Pollution – spillages into surrounding watercourses as well as groundwater.</li> <li>Health impacts – on the surrounding communities, particularly those relying on watercourses (i.e., rivers, streams, etc) as a primary source of water.</li> <li>Generation of hazardous waste</li> </ul>	-	S	M	Pr	PR	ML	Yes	<ul style="list-style-type: none"> <li>Operators are trained and competent to operate the BESS. Training should include the discussion of the following:                             <ul style="list-style-type: none"> <li>Potential impact of electrolyte spills on groundwater;</li> <li>Suitable disposal of waste and effluent;</li> <li>Key measures in the EMPr relevant to worker’s activities;</li> <li>How incidents and suggestions for improvement can be reported.</li> </ul> </li> <li>Training records should be kept on file and be made available during audits.</li> <li>Battery supplier user manuals safety specifications and Material Safety Data Sheets (MSDS) are filed on site at all times.</li> </ul>	L	-				



												<p>supplier's specifications.</p> <ul style="list-style-type: none"> <li>- Undertake daily risk assessment prior to the commencement of daily tasks at the BESS. This should consider any aspects which could result in fire or spillage, and appropriate actions should be taken to prevent these.</li> <li>- Standard Operating Procedures (SOPs) should be made available by the Supplier to ensure that the batteries are handled in accordance with required best practices.</li> <li>- Spill kits must be made available to address any incidents associated with the flow of chemicals from the batteries into the surrounding environment.</li> <li>- The assembly of the batteries on-site should be avoided as far as possible. Activities on-site for the BESS should only be limited to the placement of the container wherein the batteries are placed.</li> <li>- Undertake periodic inspections on the</li> </ul>	
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													must be kept on site and adhered to.		
SOCIAL/ECONOMIC ENVIRONMENT	Local unemployment rate	<ul style="list-style-type: none"> <li>Job creation.</li> <li>Business opportunities.</li> <li>Skills development.</li> </ul>	+	L	S	D	CR	NL	Yes	-	See Table 6.3	M	Social Impact Assessment (Appendix E8)		
	Economic multiplier effects	<ul style="list-style-type: none"> <li>Significance of the impact from the economic multiplier effects from the use of local goods and services.</li> </ul>	+	P	S	Pr	CR	NL	Yes	-	See Table 6.3	M	Social Impact Assessment (Appendix E8)		
	Improvements on shared infrastructure	<ul style="list-style-type: none"> <li>Investment into upgrading and maintain shared infrastructure such as roads and stormwater infrastructure on farms may benefit farming operations</li> </ul>	+	P	S	Pr	CR	NL	Yes	-	See Table 6.3	L	Social Impact Assessment (Appendix E8)		
	Potential loss of productive farmland	<ul style="list-style-type: none"> <li>The potential loss in productive farmland during the construction phase, due to factors such as the construction of roads, the preparation of foundations, power lines, offices etc.</li> </ul>	-	S	S	Pr	BR	ML	Yes	-	See Table 6.3	L	Social Impact Assessment (Appendix E8)		
	Influx of jobseekers and change in population in the study area.	<ul style="list-style-type: none"> <li>In-migration of labourers in search of employment opportunities, and a resultant change in population, and increase in pressure on local resources and social networks, or existing services and infrastructure</li> </ul>	-	L	P	Pr	IR	SL	Yes	-	See Table 6.3	L	Social Impact Assessment (Appendix E8)		
	Safety and security impacts	<ul style="list-style-type: none"> <li>Temporary increase in safety and security concerns associated with the influx of people during the construction phase</li> </ul>	-	L	S	Pr	CR	NL	Yes	-	See Table 6.3	L	Social Impact Assessment (Appendix E8)		
	Daily living and movement patterns	<ul style="list-style-type: none"> <li>Temporary increase in traffic disruptions and movement patterns during the construction phase.</li> </ul>	-	P	S	Pr	PR	ML	Yes	-	See Table 6.3	M	Social Impact Assessment (Appendix E8)		



			Nuisance impacts (noise and dust)	<ul style="list-style-type: none"> <li>Nuisance impacts in terms of temporary increase in noise and dust, and wear and tear on access roads to the site.</li> </ul>	-		L	S	D	CR	NL	Yes	- See Table 6.3	L	Social Impact Assessment (Appendix E8)	
			Increased risk of potential veld fires	<ul style="list-style-type: none"> <li>The potential loss of livestock, crops, and farmsteads in the area.</li> <li>This also includes the damage and loss of farm infrastructure and the threatening of human lives that are associated with the increased risk of veld fires</li> </ul>	-		L	S	Pr	PR	SL	Yes	- See Table 6.3	L	Social Impact Assessment (Appendix E8)	
			Sense of place	<ul style="list-style-type: none"> <li>Intrusion impacts from construction activities will have an impact on the area's "sense of place".</li> </ul>	-		L	S	D	PR	NL	Yes	- See Table 6.3	L	Social Impact Assessment (Appendix E8)	
			Visual landscape	<ul style="list-style-type: none"> <li>Visual impact of construction activities on sensitive visual receptors in close proximity to the SEF</li> </ul>	-		L	S	Pr	PR	ML	Yes	- See Table 6.3	L	Visual Impact Assessment (Appendix E4)	
			Visual landscape	<ul style="list-style-type: none"> <li>Visual impact of construction activities on sensitive visual receptors in close proximity to the power line</li> </ul>	-		L	S	Po	PR	ML	Yes	- See Table 6.3	L	Visual Impact Assessment (Appendix E4)	
			Traffic volumes	<ul style="list-style-type: none"> <li>Increase in development trips for the duration of the construction Phase</li> <li>Associated noise, dust and exhaust pollution</li> </ul>	-		L	M	D	CR	NL	Yes	- See Table 6.3	L	Traffic Impact Assessment (Appendix E8)	
			Tourism industry	<ul style="list-style-type: none"> <li>Since there are no sensitive tourism facilities in close proximity to the site, the proposed activities will not have an impact on tourism in the area.</li> </ul>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			Heritage resources	<ul style="list-style-type: none"> <li>As no sites, features or objects of cultural historic significance have been identified in the project area, there would be no</li> </ul>	+		S	S	U	CR	NL	N/A	- For the current study, as no sites, features or objects of cultural significance were identified, no	L	Heritage Impact Assessment (Appendix E6)	

				impact as a result of the proposed development									mitigation measures are proposed.		
			Paleontological Heritage	<ul style="list-style-type: none"> <li>Construction stage Carmel Solar 3</li> <li>Destroy or permanently seal-in fossils at or below the surface that are then no longer available for scientific study</li> </ul>	-		S	P	-	IR	CL	N/A	N/A	L	Paleontological Impact Assessment (Appendix E7)
			Paleontological Heritage	<ul style="list-style-type: none"> <li>Construction stage powerline</li> <li>Loss of fossil heritage</li> <li>Destroy or permanently seal-in fossils at or below the surface that are then no longer available for scientific study</li> </ul>	-		S	P	-	IR	CL	N/A	N/A	L	Paleontological Impact Assessment (Appendix E7)
<b>OPERATIONAL PHASE</b>															
<p><u>Activity 11(i) (GN.R. 327):</u> “The development of facilities or infrastructure for the transmission and distribution of electricity outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts.”</p> <p><u>Activity 12(ii)(a)(c) (GN.R. 327):</u> “The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (a) within a watercourse or (c) within 32 meters of a watercourse measured from the edge of a watercourse.”</p> <p><u>Activity 1 (GN.R. 325):</u> “The development of facilities or infrastructure for the generation of electricity from a renewable resource where the</p>	<p>The key components of the proposed project are described below:</p> <ul style="list-style-type: none"> <li><u>PV Panel Array</u> - To produce 240MW, the proposed facility will require numerous linked cells placed behind a protective glass sheet to form a panel. Multiple panels will be required to form the solar PV arrays which will comprise the PV facility. The PV panels will be tilted at a northern angle in order to capture the most sun or using one-axis tracker structures to follow the sun to increase the yield.</li> </ul>	BIOPHYSICAL ENVIRONMENT	Vegetation	<ul style="list-style-type: none"> <li>Establishment and spread of alien invasive plant species due to the presence of migration corridors and disturbance vectors</li> </ul>	-		S	L	Pr	BR	ML	Yes	- See Table 6.4	L	Terrestrial Biodiversity Impact Assessment (Appendix E2)
Air quality	<ul style="list-style-type: none"> <li>The proposed development will not result in any air pollution during the operational phase.</li> </ul>		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Geology	<ul style="list-style-type: none"> <li>Collapsible soil.</li> <li>Active soil (high soil heave).</li> <li>Erodible soil.</li> <li>Hard/compact geology. If the bedrock occurs close to surface it may present problems when driving power line columns.</li> <li>The presence of undermined ground.</li> <li>Instability due to soluble rock.</li> <li>Steep slopes or areas of unstable natural slopes.</li> </ul>		-		S	S	Po	PR	ML	Yes	<ul style="list-style-type: none"> <li>Surface drainage should be provided to prevent water ponding.</li> <li>Mitigation measures proposed by the detailed engineering geological investigation should be implemented.</li> </ul>	L	-		

<p>electricity output is 20 megawatts or more.”</p> <p><u>Activity 10 (c)(iv) (GN.R 324):</u>  <i>“The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (c) the Gauteng province, (iv) Sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”</i></p>	<ul style="list-style-type: none"> <li>• <u>Connection to the grid</u> - Connecting the array to the electrical grid requires transformation of the voltage from 480V to 33kV to 132kV. The normal components and dimensions of a distribution rated electrical substation will be required. Output voltage from the inverter is 480V and this is fed into step up transformers to 132kV. An onsite substation will be required to step the voltage up to 132kV, after which the power will be evacuated into the national grid. Energy generated by the facility will be transmitted from the facility substation / Eskom switching station to the Carmel Main Transmission Substation via a new 132kV powerline. The Project will inject up to 240MW into the National Grid.</li> <li>• <u>Supporting Infrastructure</u> – The following auxiliary buildings including a gate house, ablutions, workshops, storage and warehousing areas, site offices and a control centre. The project requires the need for both temporary and permanent laydown areas</li> </ul>		<ul style="list-style-type: none"> <li>• Areas subject to seismic activity.</li> <li>• Areas subject to flooding.</li> </ul>	-											
		Groundwater	<ul style="list-style-type: none"> <li>• Leakage of hazardous materials. The development will comprise of a distribution substation and will include transformer bays which will contain transformer oils. Leakage of these oils can contaminate water supplies.</li> </ul>	-		L	L	Po	PR	ML	Yes	- All areas in which substances potentially hazardous to groundwater are stored, loaded, worked with or disposed of should be securely banded (impermeable floor and sides) to prevent accidental discharge to groundwater.	L	-	
		Aquatic Ecology	<ul style="list-style-type: none"> <li>• Potential spread of alien vegetation</li> </ul>	-		L	L	Pr	IR	NL	Yes	- See Table 6.4	L	Aquatic Ecological Assessment (Appendix E1)	
		SOCIAL/ECONOMIC	Employment opportunities and skills development	<ul style="list-style-type: none"> <li>• The creation of employment opportunities and skills development opportunities during the operation phase for the country and local economy.</li> </ul>	+		P	L	Pr	BR	NL	Yes	- See Table 6.4	M	Social Impact Assessment (Appendix E8)
			Development of non-polluting, renewable energy infrastructure	<ul style="list-style-type: none"> <li>• Development of non-polluting, renewable energy infrastructure</li> </ul>	+		I	L	D	CR	ML	No	- N/A	M	Social Impact Assessment (Appendix E8)
			Loss of agricultural land and overall productivity	<ul style="list-style-type: none"> <li>• Loss of agricultural land and overall productivity as a result of the operation of the proposed project on an agricultural property.</li> </ul>	-		S	L	Pr	PR	SL	Yes	- See Table 6.4	L	Social Impact Assessment (Appendix E8)
			Contribution to LED and social upliftment	<ul style="list-style-type: none"> <li>• Contribution to LED and social upliftment during the operation of the project</li> </ul>	+		I	L	D	PR	NL	Yes	- See Table 6.4	H	Social Impact Assessment (Appendix E8)

<ul style="list-style-type: none"> <li><b>Roads</b> – The majority of the access road will follow existing, gravel farm roads that may require widening up to 6 -10 m (inclusive of storm water infrastructure). Where new sections of road need to be constructed/lengthened, this will be gravel/hard surfaced access road and only tarred if necessary. A network of gravel internal access roads and a perimeter road of up to 33 km, each with a width of up to 6 m, will be constructed to provide access to the various components of the PV development. Access will be obtained via the R501 Regional Road, an existing road located adjacent to the site.</li> <li><b>Fencing</b> - For health, safety and security reasons, the facility will be required to be fenced off from the surrounding farm. Fencing with a height of 3.5 meters will be used.</li> </ul>	<ul style="list-style-type: none"> <li>Impact on tourism</li> </ul>	<ul style="list-style-type: none"> <li>The potential impact on tourism due to the establishment of the Carmel Solar 3 SEF</li> </ul>	-		L	L	Pr	CR	NL	Yes	-	See Table 6.4	L	Social Impact Assessment (Appendix E7)	
		<ul style="list-style-type: none"> <li>Sense of place</li> </ul>	<ul style="list-style-type: none"> <li>Visual impacts and sense of place impacts associated with the operation phase of Carmel Solar 3 SEF.</li> </ul>	-		L	L	Pr	CR	ML	Yes	-	See Table 6.4	L	Social Impact Assessment (Appendix E8)
		<ul style="list-style-type: none"> <li>Increase in household earnings</li> </ul>	<ul style="list-style-type: none"> <li>The creation of employment opportunities and skills development opportunities during the operation phase for the households involved in the project would create an opportunity for an increase in household earnings.</li> </ul>	+		P	L	Pr	BR	NL	Yes	-	See Table 6.4	M	Social Impact Assessment (Appendix E8)
		<ul style="list-style-type: none"> <li>Visual landscape</li> </ul>	<ul style="list-style-type: none"> <li>Visual impact on sensitive visual receptors within a 1km radius from the SEF</li> </ul>	-		L	L	Pr	PR	ML	Yes	-	See Table 6.4	L	Visual Impact Assessment (Appendix E4)
		<ul style="list-style-type: none"> <li>Visual landscape</li> </ul>	<ul style="list-style-type: none"> <li>Visual impact on sensitive receptors within a 1km radius from the power line</li> </ul>	-		L	L	Po	PR	ML	Yes	-	See Table 6.4	L	Visual Impact Assessment (Appendix E4)
		<ul style="list-style-type: none"> <li>Visual landscape</li> </ul>	<ul style="list-style-type: none"> <li>Visual impact on sensitive visual receptors between a 1km and 3km radius from the SEF</li> </ul>	-		L	L	Po	PR	ML	Yes	-	See Table 6.4	L	Visual Impact Assessment (Appendix E4)
		<ul style="list-style-type: none"> <li>Visual landscape</li> </ul>	<ul style="list-style-type: none"> <li>Visual impact on sensitive receptors between a 1km and 3km radius from the power line</li> </ul>	-		L	L	Po	PR	ML	Yes	-	See Table 6.4	L	Visual Impact Assessment (Appendix E4)
		<ul style="list-style-type: none"> <li>Visual landscape</li> </ul>	<ul style="list-style-type: none"> <li>Visual impact on sensitive visual receptors within a 3km and 5km radius from the SEF</li> </ul>	-		L	L	Po	PR	ML	Yes	-	See Table 6.4	L	Visual Impact Assessment (Appendix E4)
		<ul style="list-style-type: none"> <li>Visual landscape</li> </ul>	<ul style="list-style-type: none"> <li>Visual impact on sensitive receptors between a 3km and 5km radius from the power line</li> </ul>	-		L	L	Po	PR	ML	Yes	-	See Table 6.4	L	Visual Impact Assessment (Appendix E4)
		<ul style="list-style-type: none"> <li>Visual landscape</li> </ul>	<ul style="list-style-type: none"> <li>Visual impact on sensitive visual receptors within a 5-10km radius from the SEF</li> </ul>	-		L	L	Po	PR	ML	Yes	-	See Table 6.4	L	Visual Impact Assessment (Appendix E4)

			Visual landscape	<ul style="list-style-type: none"> <li>Visual impact on sensitive receptors within a 5-10km radius from the power line</li> </ul>	-		L	L	Po	PR	NL	Yes	- See Table 6.4	L	Visual Impact Assessment (Appendix E4)
			Visual landscape	<ul style="list-style-type: none"> <li>Visual impacts of lighting at night on sensitive visual receptors in close proximity to the proposed facility</li> </ul>	-		L	L	Po	CR	ML	Yes	- See Table 6.4	L	Visual Impact Assessment (Appendix E4)
			Visual landscape	<ul style="list-style-type: none"> <li>Visual impacts of glint and glare as a visual distraction and possible air travel hazard</li> </ul>	-		L	L	U	CR	NL	Yes	- See Table 6.4	L	Visual Impact Assessment (Appendix E4)
			Visual landscape	<ul style="list-style-type: none"> <li>Visual impacts on sense of place associated with the operational phase of the SEF</li> </ul>	-		L	L	Po	PR	ML	Yes	- See Table 6.4	L	Visual Impact Assessment (Appendix E4)
			Visual landscape	<ul style="list-style-type: none"> <li>Visual impacts and sense of place impacts associated with the operation phase of the PL</li> </ul>	-		L	L	Po	CR	ML	Yes	- See Table 6.4	L	Visual Impact Assessment (Appendix E4)
			Traffic volumes	<ul style="list-style-type: none"> <li>Slight increase in trips due to permanent staff on site.</li> <li>Increase in trips around twice a year for transport of water to site for the cleaning of solar panels (water source to be clarified – borehole or transported to site / size of water tankers if water is to be delivered on site).</li> </ul>	-		L	S	Pr	CR	NL	Yes	- See Table 6.4	L	Traffic Impact Assessment (Appendix E9)
			Health & Safety	<ul style="list-style-type: none"> <li>The proposed development will not result in any health and safety impacts during the operational phase.</li> </ul>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	-	N/A	N/A
			Noise levels	<ul style="list-style-type: none"> <li>The proposed development will not result in any noise pollution during the operational phase.</li> </ul>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			Heritage resources	<ul style="list-style-type: none"> <li>As no sites, features or objects of cultural historic significance have been identified in the project area, there would be no impact as a result of the proposed development</li> </ul>	+		S	S	U	CR	NL	N/A	For the current study, as no sites, features or objects of cultural significance were identified, no mitigation measures are proposed.	L	Heritage Impact Assessment (Appendix E6)

			Electricity supply	<ul style="list-style-type: none"> <li>Generation of additional electricity. The power line will transport generated electricity into the grid.</li> </ul>	+		I	L	D	I	N/A	Yes	-	N/A	-	
			Electrical infrastructure	<ul style="list-style-type: none"> <li>Additional electrical infrastructure. The proposed solar facility will add to the existing electrical infrastructure and aid to lessen the reliance of electricity generation from coal-fired power stations.</li> </ul>	+		I	L	D	I	N/A	Yes	-	N/A	-	
<b>DECOMMISSIONING PHASE</b>																
-	<p><u>Dismantlement of infrastructure</u></p> <p>During the decommissioning phase the Solar PV Energy facility and its associated infrastructure will be dismantled.</p> <p><u>Rehabilitation of biophysical environment</u></p> <p>The biophysical environment will be rehabilitated.</p>	BIOPHYSICAL ENVIRONMENT	Vegetation	<ul style="list-style-type: none"> <li>Loss and disturbance of natural vegetation due to the removal of infrastructure and need for working sites</li> </ul>	-		S	P	Pr	PR	ML	Yes	- See Table 6.5	L	Terrestrial Biodiversity Impact Assessment (Appendix E2)	
			Vegetation	<ul style="list-style-type: none"> <li>Continued establishment and spread of alien invasive plant species due to the presence of migration corridors and disturbance vectors</li> </ul>	-		S	L	Pr	BR	ML	Yes	- See Table 6.5	L	Terrestrial Biodiversity Impact Assessment (Appendix E2)	
			Air quality	<ul style="list-style-type: none"> <li>Air pollution due to the increase of traffic of construction vehicles.</li> </ul>	-		S	S	D	CR	NL	Yes	- Regular maintenance of equipment to ensure reduced exhaust emissions.	L	-	
			Geology	<ul style="list-style-type: none"> <li>It is not foreseen that the decommissioning phase will impact on the geology of the site or vice versa.</li> </ul>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			Existing services infrastructure	<ul style="list-style-type: none"> <li>Generation of waste that needs to be accommodated at a licensed landfill site.</li> <li>Generation of sewage that needs to be accommodated by the municipal sewerage system and the local sewage plant.</li> </ul>	-		L	S	D	I	NL	Yes	-	L	-	

				<ul style="list-style-type: none"> <li>Increase in construction vehicles.</li> </ul>											
			Groundwater	<ul style="list-style-type: none"> <li>Pollution due to construction vehicles.</li> </ul>	-		S	S	Pr	CR	ML	Yes	-	L	-
			Aquatic Ecology	<ul style="list-style-type: none"> <li>Loss of habitat containing protected species or Species of Special Concern</li> <li>Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones.</li> <li>Loss can also include a functional loss, through change in vegetation type via alien encroachment, reducing aquatic biodiversity.</li> </ul>	-		L	L	Pr	IR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)
			Aquatic Ecology	<ul style="list-style-type: none"> <li>Loss of CBAs or potential areas with conservation potential</li> <li>Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones and have been included in any Critical Biodiversity Areas</li> </ul>	-		L	L	Pr	IR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)
			Aquatic Ecology	<ul style="list-style-type: none"> <li>Loss of riparian and or wetland habitat</li> <li>During construction/decommissioning, complete clearing of the PV panel areas, as well as any ancillary structures (offices and substations)</li> </ul>	-		L	L	Pr	IR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)



				will be required, which may impact the aquatic function or any corridors or connections between aquatic systems. However, these areas can be avoided by the proposed layout.													
			Aquatic Ecology	<ul style="list-style-type: none"> <li>Changes to the hydrological regime and increase potential for erosion</li> <li>Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones and have been included in any Critical Biodiversity Areas</li> </ul>	-	L	L	Pr	IR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)			
			Aquatic Ecology	<ul style="list-style-type: none"> <li>Changes to surface water quality characteristics</li> <li>During construction or decommissioning, earthworks will expose and mobilise earth materials, and a number of materials as well as chemicals will be imported and used on site and may end up in the surface water, including soaps, oils, grease and fuels, human wastes, cementitious wastes, paints and solvents, etc.</li> <li>Any spills during transport or while works area conducted in proximity to a watercourse has the potential to affect the surrounding biota.</li> </ul>	-	L	L	Pr	IR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)			

				<ul style="list-style-type: none"> <li>This can result in possible deterioration in aquatic ecosystem integrity and species diversity.</li> </ul>											
			Traffic volumes	<ul style="list-style-type: none"> <li>Increase in development trips for the duration of the construction Phase</li> <li>Associated noise, dust and exhaust pollution</li> </ul>	-		L	M	D	CR	NL	Yes	- See Table 6.3	L	Traffic Impact Assessment (Appendix E9)
			Tourism industry	<ul style="list-style-type: none"> <li>Since there are no tourism facilities in close proximity to the site, the decommissioning activities will not have an impact on tourism in the area.</li> </ul>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			Heritage resources	<ul style="list-style-type: none"> <li>As no sites, features or objects of cultural historic significance have been identified in the project area, there would be no impact as a result of the proposed development</li> </ul>	+		S	S	U	CR	NL	N/A	For the current study, as no sites, features or objects of cultural significance were identified, no mitigation measures are proposed.	L	Heritage Impact Assessment (Appendix E6)

<b>Nature of the impact:</b>	(N/A) No impact	(+) Positive Impact (-)	Negative Impact	
<b>Geographical extent:</b>	(S) Site;	(L) Local/District;	(P) Province/Region;	(I) International and National
<b>Probability:</b>	(U) Unlikely;	(Po) Possible;	(Pr) Probable;	(D) Definite
<b>Duration:</b>	(S) Short Term;	(M) Medium Term;	(L) Long Term;	(P) Permanent
<b>Intensity / Magnitude:</b>	(L) Low;	(M) Medium;	(H) High;	(VH) Very High
<b>Reversibility:</b>	(CR) Completely Reversible;	(PR) Partly Reversible;	(BR) Barely Reversible;	(IR) Irreversible
<b>Irreplaceable loss of resources:</b>	(IR) Irreversible	(NL) No Loss;	(ML) Marginal Loss;	(SL) Significant Loss; (CL) Complete Loss
<b>Level of residual risk:</b>	(L) Low;	(M) Medium;	(H) High;	(VH) Very High -

## 6.2 KEY ISSUES IDENTIFIED

From the above it is evident that mitigation measures should be available for potential impacts associated with the proposed activity and development phases. The scoping methodology identified the following key issues which should be addressed in more detail in the EIA report.

### 6.2.1 Impacts During the Construction Phase

During the construction phase the following activities will have various potential impacts on the biophysical and socio-economic environment:

- Activity 11(i) (GN.R. 327): *“The development of facilities or infrastructure for the transmission and distribution of electricity outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts.”*
- Activity 12(ii)(a)(c) (GN.R. 327): *“The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (a) within a watercourse or (c) within 32 meters of a watercourse measured from the edge of a watercourse.”*
- Activity 19 (GNR 327): *“The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse.”*
- Activity 24 (ii) (GN.R 327): *“The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters.”*
- Activity 27 (GN.R. 327): *“The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation...”*
- Activity 28(ii) (GN.R. 327): *“Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare.”*
- Activity 56 (ii) (GN.R 327): *“The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre (ii) where no reserve exists, where the existing road is wider than 8 metres...”*
- Activity 1 (GN.R. 325): *“The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more...”*
- Activity 15 (GN.R. 325): *“The clearance of an area of 20 hectares or more of indigenous vegetation...”*
- Activity 4 (c)(iv) (GN.R 324): *“The development of a road wider than 4 metres with a reserve less than 13,5 metres within (c) the Gauteng province, (iv) Sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”*
- Activity 10 (c)(iv) (GN.R 324): *“The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (c) the Gauteng province, (iv) Sites identified as Critical Biodiversity*

*Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”*

- Activity 12 (c)(ii) (GN.R 324): *“The clearance of an area of 300 square metres or more of indigenous vegetation (c) in the Gauteng Province, (ii) within Critical Biodiversity Areas or Ecological Support Areas identified in the Gauteng Conservation Plan or bioregional plans.”*
- Activity 14(ii)(c)(c)(iv) (GN.R 324): *“The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more, where such development occurs (c) within 32 metres of a watercourse, measured from the edge of a watercourse (c) within the Gauteng Province, within (iv) sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”*
- Activity 18 (c)(iv) (GN.R 324): *“The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (c) in the Gauteng Province within (iv) sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”*
- Activity 18 (h)(v) (GN.R 324): *“The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (h) in the North West Province within (v) Critical Biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority.”*

During the construction phase temporary negative impacts are foreseen over the short term. Table 6.3 summarizes the potentially most significant impacts and the mitigation measures that are proposed during the construction phase.

**Table 6.3:** Impacts and the mitigation measures during the construction phase

SPECIALIST STUDY	IMPACT	PRE-MITIGATION RATING	POST MITIGATION RATING	SUMMARY OF MITIGATION MEASURES
Terrestrial Biodiversity Impact Assessment (Appendix E2)	Indigenous natural vegetation Loss, degradation or fragmentation of vegetation through direct clearing	Negative Medium	Negative Medium	<ul style="list-style-type: none"> <li>• Avoid grassland area, if possible.</li> <li>• Minimise vegetation clearing and disturbance to footprint areas only.</li> <li>• Compile a rehabilitation programme and rehabilitate disturbed areas.</li> <li>• Compile and implement Alien Invasive Management Plan.</li> <li>• Undertake monitoring to evaluate whether further measures are required.</li> </ul>
Avifauna Impact Assessment (Appendix E3)	Displacement of priority avian species from important habitats (PV array and associated infrastructure)	Negative High	Negative Medium	<ul style="list-style-type: none"> <li>• It is difficult to mitigate against the loss of habitat since clearing of vegetation (or habitat) will be required for the infrastructure associated with the project. The PV facilities and associated infrastructure occur predominantly on habitat types of medium sensitivity. The best practicable mitigation will be to consolidate infrastructure.</li> <li>• Avoid and buffer areas where threatened bird species occur (e.g., Secretarybirds– to be confirmed during the EIA/baseline surveys).</li> <li>• All road networks must be planned with care to minimise dissection or fragmentation of important avifaunal habitat type. Where possible, the use of existing roads is encouraged.</li> </ul>
	Displacement of resident avifauna through increased disturbance (PV array and associated infrastructure)	Negative High	Negative Medium	<ul style="list-style-type: none"> <li>• It is difficult to mitigate against the loss of habitat since clearing of vegetation (or habitat) will be required for the infrastructure associated with the project. The PV facilities and associated infrastructure occur predominantly on habitat types of medium</li> </ul>

				<p>sensitivity. The best practicable mitigation will be to consolidate infrastructure.</p> <ul style="list-style-type: none"> <li>All road networks must be planned with care to minimise dissection or fragmentation of important avifaunal habitat type. Where possible, the use of existing roads is encouraged.</li> </ul>
	Loss of important avian habitats (PV array and associated infrastructure)	Negative High	Negative Medium	<ul style="list-style-type: none"> <li>It is difficult to mitigate against the loss of habitat since clearing of vegetation (or habitat) will be required for the infrastructure associated with the project. The PV facilities and associated infrastructure occur predominantly on habitat types of medium sensitivity. The best practicable mitigation will be to consolidate infrastructure.</li> <li>Avoid and buffer habitat with high preliminary avian sensitivities. Where necessary, relocate or remove artificial watering points.</li> </ul>
	Displacement of priority avian species from important habitats (Power Line)	Negative High	Negative Medium	<ul style="list-style-type: none"> <li>It is difficult to mitigate against the loss of habitat since clearing of vegetation (or habitat) will be required for the infrastructure associated with the project. The grid connection infrastructure occurs predominantly on habitat types of medium sensitivity. The best practicable mitigation will be to consolidate infrastructure (e.g., proposed powerline) to areas where existing impacts occur (e.g., placing the proposed powerline alongside existing powerlines).</li> <li>Conduct a “walk-through” of the powerline servitude to identify potential areas where threatened bird species utilise the area – either re-align the powerline or move pylon footprints.</li> <li>All road networks must be planned with care to minimise dissection or fragmentation of important avifaunal habitat type. Where possible, the use of existing roads is encouraged.</li> </ul>

	Displacement of resident avifauna through increased disturbance (Power Line)	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>It is difficult to mitigate against the loss of habitat since clearing of vegetation (or habitat) will be required for the infrastructure associated with the project. The grid connection infrastructure occurs predominantly on habitat types of medium sensitivity. The best practicable mitigation will be to consolidate infrastructure (e.g., proposed powerline) to areas where existing impacts occur (e.g., placing the proposed powerline alongside existing powerlines).</li> <li>All road networks must be planned with care to minimise dissection or fragmentation of important avifaunal habitat type. Where possible, the use of existing roads is encouraged.</li> </ul>
	Loss of important avian habitats (Power Line)	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>Avoid and buffer habitat with high preliminary avian sensitivities. Where necessary, relocate or remove artificial watering points.</li> <li>Conduct a “walk-through” of the powerline servitude to identify potential areas where threatened bird species utilise the area – either re-align the powerline or move pylon footprints.</li> </ul>
Aquatic Ecological Assessment (Appendix E1)	Loss of habitat containing protected species or Species of Special Concern	Negative Medium	Negative Low	<p>Mitigation measures to reduce residual risk or enhance opportunities:</p> <ul style="list-style-type: none"> <li>A pre-construction walkthrough with an aquatic specialist is recommended and they can assist with the development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to micro-siting of the final layout.</li> <li>Where large cut and fill areas are required these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation.</li> <li>Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc).</li> </ul>



				<p>To minimise the impact of the access roads:</p> <ul style="list-style-type: none"> <li>• Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible.</li> <li>• Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Any unnecessary intrusion into these areas is prohibited. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.</li> <li>• Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.</li> <li>• All pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert.</li> <li>• The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist during a pre-construction walkdown.</li> <li>• Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow</li> </ul>
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				<p>patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.</p> <ul style="list-style-type: none"> <li>Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.</li> <li>All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.</li> <li>It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.</li> </ul>
	<p>Loss of CBAs or potential areas with conservation potential</p>	<p>Negative Medium</p>	<p>Negative Low</p>	<p>Mitigation measures to reduce residual risk or enhance opportunities:</p> <ul style="list-style-type: none"> <li>The aquatic systems have been mapped to a finer scale and have taken cognizance of any potential CBAs. If High / No-Go are avoided by the major infrastructure, then aquatic zones associated with the development can be avoided, noting that at Present the Gauteng Province does not have any spatial data on Aquatic CBAs</li> <li>A pre-construction walkthrough with an aquatic specialist is recommended and they can assist with the development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to micro-siting of the final layout.</li> <li>Where large cut and fill areas are required these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation.</li> <li>Suitable stormwater management systems must be installed along</li> </ul>

				<p>roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc).</p> <p>To minimise the impact of the access roads:</p> <ul style="list-style-type: none"> <li>• Use existing roads or upgrade existing tracks to cross wetlands rather than constructing entirely new roads wherever possible.</li> <li>• Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Any unnecessary intrusion into these areas is prohibited. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.</li> <li>• Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.</li> <li>• All pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert.</li> <li>• The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist during a pre-construction walkdown.</li> <li>• Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags</li> </ul>
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				<p>used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.</p> <ul style="list-style-type: none"> <li>Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.</li> <li>All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.</li> <li>It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.</li> </ul>
	Potential spread of alien vegetation	Negative Medium	Negative Low	<p>Mitigation measures to reduce residual risk or enhance opportunities:</p> <ul style="list-style-type: none"> <li>Alien vegetation management must be initiated at the beginning of the construction period and must extend into any remaining areas into the operation phase on the facility</li> <li>The revegetation of any temporary sites as well as any previously degraded areas must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications</li> <li>Regeneration of alien vegetation must be monitored once all areas have been cleared, forming part of a long-term alien vegetation management plan</li> </ul>

	Loss of riparian and or wetland habitat	Negative Medium	Negative Low	<p>Mitigation measures to reduce residual risk or enhance opportunities:</p> <ul style="list-style-type: none"> <li>• A pre-construction walkthrough with an aquatic specialist is recommended and they can assist with the development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to micro-siting of the final layout.</li> <li>• Where large cut and fill areas are required these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation.</li> <li>• Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc).</li> </ul> <p>To minimise the impact of the access roads:</p> <ul style="list-style-type: none"> <li>• Use existing roads or upgrade existing tracks to cross wetlands rather than constructing entirely new roads wherever possible.</li> <li>• Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Any unnecessary intrusion into these areas is prohibited. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.</li> <li>• Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.</li> <li>• All pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an</li> </ul>
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				<p>appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert.</p> <ul style="list-style-type: none"> <li>• The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist during a pre-construction walkdown.</li> <li>• Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.</li> <li>• Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.</li> <li>• All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.</li> <li>• It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.</li> </ul>
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	<p>Changes to the hydrological regime and increase potential for erosion</p>	<p>Negative Medium</p>	<p>Negative Low</p>	<p>Mitigation measures to reduce residual risk or enhance opportunities:</p> <ul style="list-style-type: none"> <li>• The preferred option is recommended as all aquatic systems have been avoided</li> <li>• No stormwater discharged may be directed to delineated aquatic zones or the associated buffers.</li> <li>• A stormwater management plan must be developed post EA, detailing the structures and actions that must be installed to prevent the increase of surface water flows directly into any natural systems.</li> <li>• Effective stormwater management must include measures to slow, spread and deplete the energy of concentrated flows thorough effective stabilisation (gabions and Reno mattresses) and the re-vegetation of any disturbed areas</li> </ul> <p>To minimise the impact of the access roads:</p> <ul style="list-style-type: none"> <li>• Use existing roads or upgrade existing tracks to cross wetlands rather than constructing entirely new roads wherever possible.</li> <li>• Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Any unnecessary intrusion into these areas is prohibited. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.</li> <li>• Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.</li> <li>• All pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that</li> </ul>
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				<p>head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert.</p> <ul style="list-style-type: none"> <li>• The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist during a pre-construction walkdown.</li> <li>• Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.</li> <li>• Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.</li> <li>• All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.</li> <li>• It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.</li> </ul>
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	Changes to surface water quality characteristics	Negative Medium	Negative Low	<p>Mitigation measures to reduce residual risk or enhance opportunities:</p> <ul style="list-style-type: none"> <li>All liquid chemicals including fuels and oil, including for the BESS, must be stored in with secondary containment (bunds or containers or berms) that can contain a leak or spill. Such facilities must be inspected routinely and must have the suitable PPE and spill kits needed to contain likely worst-case scenario leak or spill in that facility, safely.</li> <li>Washing and cleaning of equipment must be done in designated wash bays, where rinse water is contained in evaporation/sedimentation ponds (to capture oils, grease cement and sediment).</li> <li>Mechanical plant and bowsers must not be refueled or serviced within 100m of a river channel or wetland.</li> <li>All construction camps, lay down areas, wash bays, batching plants or areas and any stores should be more than 50 m from any demarcated water courses.</li> <li>Littering and contamination associated with construction activity must be avoided through effective construction camp management.</li> <li>No stockpiling should take place within or near a water course.</li> <li>All stockpiles must be protected and located in flat areas where run-off will be minimised and sediment recoverable.</li> <li>ESO monitors the site on a daily basis to ensure plant is in working order (minimise leaks), spills are prevented and if they do occur, are quickly rectified.</li> </ul>
Visual Impact Assessment (Appendix E4)	Visual impact of construction activities on sensitive visual receptors in close proximity to the SEF	Negative Medium	Negative Low	<p>Planning:</p> <ul style="list-style-type: none"> <li>Retain and maintain natural vegetation immediately adjacent to the development footprint.</li> </ul> <p>Construction:</p>

	<p>Visual impact of construction activities on sensitive visual receptors to the PL.</p>	<p>Negative Low</p>	<p>Negative Low</p>	<ul style="list-style-type: none"> <li>• Ensure that vegetation is not unnecessarily removed during the construction phase.</li> <li>• Plan the placement of laydown areas and temporary construction equipment camps in order to minimise vegetation clearing (i.e., in already disturbed areas) where possible.</li> <li>• Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.</li> <li>• Ensure that rubble, litter, etc. are appropriately stored (if it can't be removed daily) and then disposed of regularly at a licenced waste site.</li> <li>• Reduce and control dust during construction by utilising dust suppression measures.</li> <li>• Limit construction activities between 07:00 and 18:00, where possible, in order to reduce the impacts of construction lighting.</li> <li>• Rehabilitate all disturbed areas immediately after the completion of construction work and maintain good housekeeping.</li> </ul>
<p>Social Impact Assessment (Appendix E8)</p>	<p>The creation of direct and indirect employment opportunities during the construction phase of the project</p>	<p>Low Positive</p>	<p>Medium Positive</p>	<p>Enhancement:</p> <ul style="list-style-type: none"> <li>• A local employment policy should be adopted to maximise opportunities made available to the local labour force.</li> <li>• Labour should be sourced from the local labour pool, and only if the necessary skills are unavailable should labour be sourced from (in order of preference) the greater Merafong City LM, West Rand DM, Gauteng Province as well as in the JB Marks LM, Dr Kenneth Kaunda DM, North West Province, South Africa, or elsewhere.</li> <li>• Where feasible, training and skills development programmes should be initiated prior to the commencement of the construction phase.</li> <li>• As with the labour force, suppliers should also as far as possible be sourced locally.</li> </ul>

				<ul style="list-style-type: none"> <li>As far as possible local contractors that are compliant with Broad-Based Black Economic Empowerment (B-BBEE) criteria should be used.</li> <li>The recruitment selection process should seek to promote gender equality and the employment of women wherever possible.</li> </ul>
	Significance of the impact from the economic multiplier effects from the use of local goods and services.	Low Positive	Medium Positive	<p>Enhancement:</p> <ul style="list-style-type: none"> <li>It is recommended that a local procurement policy is adopted to maximise the benefit to the local economy.</li> <li>A database of local companies, specifically Historically Disadvantaged Individuals (HDIs) which qualify as potential service providers (e.g., construction companies, security companies, catering companies, waste collection companies, transportation companies etc.) should be created and companies listed thereon should be invited to bid for project-related work where applicable.</li> <li>Local procurement is encouraged along with engagement with local authorities and business organisations to investigate the possibility of procurement of construction materials, goods and products from local suppliers where feasible.</li> </ul>
	Investment into upgrading and maintain shared infrastructure such as roads and stormwater infrastructure on farms may benefit farming operations	Low Positive	Low Positive	<p>Enhancement:</p> <ul style="list-style-type: none"> <li>The project would contribute to an upgrade in the shared infrastructure of the LM's as well as in the maintenance of this infrastructure.</li> <li>The LMs would be encouraged to participate in this maintenance and upgrade where it would be feasible for them to be involved.</li> <li>A database of local companies, specifically Historically Disadvantaged Individuals (HDIs) which qualify as potential service providers (e.g., construction companies, security companies, catering companies, waste collection companies, transportation companies etc.) should be created (or sourced from the local Municipalities, where available) and</li> </ul>

				<p>companies listed thereon should be invited to bid for project-related work where applicable and this would include the maintenance of this shared infrastructure.</p>
	<p>The potential loss in productive farmland during the construction phase, due to factors such as the construction of roads, the preparation of foundations, power lines, offices etc</p>	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>• The proposed site for the Carmel Solar 3 SEF needs to be fenced off prior to the construction phase and all construction related activities should be confined in this fenced off area.</li> <li>• Game grazing on the proposed site need to be relocated.</li> <li>• All affected areas, which are disturbed during the construction phase, need to be rehabilitated prior to the operational phase and should be continuously monitored by the Environmental Control Officer (ECO).</li> <li>• Implement, manage and monitor a grievance mechanism for the recording and management of social issues and complaints.</li> <li>• Mitigation measures from the Agricultural and Soil Report, should also be implemented.</li> </ul>
	<p>In-migration of labourers in search of employment opportunities, and a resultant change in population, and increase in pressure on local resources and social networks, or existing services and infrastructure</p>	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>• Develop and implement a local procurement policy which prioritises “locals first” to prevent the movement of people into the area in search of work.</li> <li>• Engage with local community representatives prior to construction to facilitate the adoption of the locals first procurement policy.</li> <li>• Provide transportation for workers (from Carletonville and surrounds) to ensure workers can easily access their place of employment and do not need to move closer to the project site.</li> <li>• As far as possible, working hours should be kept between daylight hours during the construction phase, and / or as any deviation that is approved by the relevant authorities.</li> <li>• Compile and implement a grievance mechanism.</li> <li>• Appoint a Community Liaison Officer (CLO) to assist with the procurement of local labour.</li> </ul>

				<ul style="list-style-type: none"> <li>• Prevent the recruitment of workers at the project site.</li> <li>• Implement, manage and monitor a grievance mechanism for the recording and management of social issues and complaints.</li> <li>• Establish clear rules and regulations for access to the proposed site.</li> <li>• Appoint a security company and implement appropriate security procedures to ensure that workers do not remain onsite after working hours.</li> <li>• Inform local community organisations and policing forums of construction times and the duration of the construction phase.</li> <li>• Establish procedures for the control and removal of loiterers from the construction site.</li> </ul>
	<p>Temporary increase in safety and security concerns associated with the influx of people during the construction phase</p>	<p>Negative Medium</p>	<p>Negative Low</p>	<ul style="list-style-type: none"> <li>• As far as possible, working hours should be kept within daylight hours during the construction phase, and / or as any deviation that is approved by the relevant authorities.</li> <li>• Provide transportation for workers to prevent loitering within or near the project site outside of working hours.</li> <li>• The perimeter of the construction site should be appropriately secured to prevent any unauthorised access to the site. The fencing of the site should be maintained throughout the construction period.</li> <li>• The appointed EPC Contractor must appoint a security company to ensure appropriate security procedures and measures are implemented.</li> <li>• Access in and out of the construction site should be strictly controlled by a security company appointed to the project.</li> <li>• A CLO should be appointed as a grievance mechanism. A method of communication should be implemented whereby procedures to lodge complaints are set out for the local community to express any complaints or grievances with the construction process.</li> </ul>

				<ul style="list-style-type: none"> <li>• The EPC Contractor should implement a stakeholder management plan to address neighbouring farmer concerns regarding safety and security.</li> <li>• The project proposed must prepare and implement a Fire Management Plan; this must be done in conjunction with surrounding landowners.</li> <li>• The EPC Contractor must prepare a Method Statement which deals with fire prevention and management.</li> </ul>
	<p>Temporary increase in traffic disruptions and movement patterns during the construction phase.</p>	<p>Negative Medium</p>	<p>Negative Medium</p>	<ul style="list-style-type: none"> <li>• All vehicles must be road worthy, and drivers must be qualified, obey traffic rules, follow speed limits and be made aware of the potential road safety issues.</li> <li>• Heavy vehicles should be inspected regularly to ensure their road worthiness.</li> <li>• Provision of adequate and strategically placed traffic warning signs, that have to be maintained for the duration of the construction phase, and control measures along the R501 road to warn road users of the construction activities taking place for the duration of the construction phase. Warning signs must be always visible, especially at night.</li> <li>• Implement penalties for reckless driving to enforce compliance to traffic rules.</li> <li>• Avoid heavy vehicle activity during “peak” hours (when children are taken to school, or people are driving to work).</li> <li>• The developer and EPC Contractor must ensure that all fencing along access roads is maintained in the present condition or repaired if disturbed due to construction activities.</li> <li>• The developer and EPC Contractor must ensure that the roads utilised for construction activities are either maintained in the present condition or upgraded if disturbed due to construction activities.</li> </ul>



				<ul style="list-style-type: none"> <li>The EPC Contractor must ensure that damage / wear and tear caused by construction related traffic to the access roads is repaired before the completion of the construction phase.</li> <li>A method of communication must be implemented whereby procedures to lodge complaints are set out for the local community to express any complaints or grievances with the construction process.</li> </ul>
	Nuisance impacts in terms of temporary increase in noise and dust, and wear and tear on access roads to the site	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>The movement of heavy vehicles associated with the construction phase should be timed to avoid weekends, public holidays, and holiday periods where feasible.</li> <li>Dust suppression measures must be implemented for heavy vehicles such as wetting of gravel roads on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers.</li> <li>Ensure all vehicles are road worthy, drivers are qualified and are made aware of the potential noise and dust issues.</li> <li>A CLO should be appointed, and a grievance mechanism implemented.</li> </ul>
	The potential loss of livestock, crops, and farmsteads in the area. This also includes the damage and loss of farm infrastructure and the threatening of human lives that are associated with the increased risk of veld fires	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>A firebreak should be implemented before the construction phase. The firebreak should be controlled and implemented around the perimeters of the project site.</li> <li>Adequate fire-fighting equipment should be provided and readily available on site and all staff should be trained in firefighting and how to use the fire-fighting equipment.</li> <li>No staff (except security) should be accommodated overnight on site and the contractor should ensure that no open fires are allowed on site. The use of cooking or heating implements should only be used in designated areas.</li> </ul>

				<ul style="list-style-type: none"> <li>Contractors need to ensure that any construction related activities that might pose potential fire risks, are done in the designated areas where it is also managed properly.</li> <li>Precautionary measures need to be taken during high wind conditions or during the winter months when the fields are dry.</li> <li>Fire risks must be managed in terms of a fire management plan and in compliance with the National Veld and Forest Fire Act.</li> </ul>
	Intrusion impacts from construction activities will have an impact on the area's "sense of place".	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>Implement mitigation measures identified in the Visual Impact Assessment (VIA) prepared for the project.</li> <li>Limit noise generating activities to normal daylight working hours and avoid weekends and public holidays.</li> <li>The movement of heavy vehicles associated with the construction phase should be timed to avoid weekends, public holidays, and holiday periods where feasible.</li> <li>Dust suppression measures must be implemented for heavy vehicles such as wetting of gravel roads on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers.</li> <li>All vehicles must be road-worthy, and drivers must be qualified and made aware of the potential road safety issues and need for strict speed limits.</li> <li>Communication, complaints, and grievance channels must be implemented, and contact details of the CLO must be provided to the local community in the study area.</li> </ul>
Traffic Impact Assessment (Appendix E9)	Increase in development trips for the duration of the construction Phase	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>Stagger component delivery to site.</li> <li>Reduce the construction period.</li> <li>Stagger the construction Phase.</li> </ul>

	Associated noise, dust and exhaust pollution			<ul style="list-style-type: none"><li>• The use of mobile batch plants and quarries in close proximity to the site would decrease the impact on the surrounding road network</li><li>• Staff and general trips should occur outside of peak traffic periods as much as possible.</li><li>• Maintenance of haulage routes.</li><li>• Design and maintenance of internal roads.</li><li>• Provide two access points to the site to split construction vehicle trips.</li></ul>
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### 6.3 Impacts During the Operational Phase

During the operational phase the site will serve as a solar plant. The potential impacts will take place over a period of 20 – 25 years. During the operational phase the following activities will have various potential impacts on the biophysical and socio-economic environment:

- Activity 11(i) (GN.R. 327): *“The development of facilities or infrastructure for the transmission and distribution of electricity outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts.”*
- Activity 14 (GNR 327): *“The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres.”*
- Activity 1 (GN.R 325): *“The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more.”*
- Activity 10 (c)(iv) (GN.R 324): *“The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (c) the Gauteng province, (iv) Sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.”*

During the operational phase minor negative impacts are foreseen over the long term. The latter refers to at least a 20-year period. Table 6.4 summarizes the potentially most significant impacts and the mitigation measures that are proposed during the operational phase.

**Table 6.4:** Impacts and the mitigation measures during the operational phase

SPECIALIST STUDY	IMPACT	PRE-MITIGATION RATING	POST MITIGATION RATING	SUMMARY OF MITIGATION MEASURES
Terrestrial Biodiversity Impact Assessment (Appendix E2)	Vegetation Establishment and spread of alien invasive plant species due to the presence of migration corridors and disturbance vectors	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>Compile and implement Alien Invasive Management Plan. Rehabilitate disturbed areas.</li> </ul>
Avifauna Impact Assessment (Appendix E3)	Displacement of priority avian species from important habitats	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>Avoid and buffer habitat with high preliminary avian sensitivities.</li> </ul>
	Displacement of resident avifauna through increased disturbance	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>Avoid and buffer habitat with high preliminary avian sensitivities.</li> </ul>
	Collisions with PV panels leading to injury or loss of avian life	Negative Medium	Negative Medium	<ul style="list-style-type: none"> <li>Apply bird deterrent devices such as rotating flashers/reflectors to the panels for birds that may mistake the panels for open water and to prevent them from landing on the panels - these should especially be placed at panels nearest to pans and watering points. Security/CCTV cameras may be installed to quantify mortalities (cameras are also installed along the perimeter fence for security measures and may also prove effective to quantify mortalities).</li> </ul>

				<ul style="list-style-type: none"> <li>• Buffer ephemeral drainage systems (by at least 500m – buffer width will be re-evaluated pending the results obtained during the EIA/baseline surveys).</li> <li>• Implement additional pre-construction monitoring to evaluate important bird flyways/dispersal routes.</li> <li>• Implement post-construction monitoring. If post-construction monitoring predicts and/or confirms any bird mortalities, an option is to employ video cameras at selected areas to document bird mortalities and to conduct direct observations and carcass searches on a regular and systematic basis.</li> </ul>
	Displacement of priority avian species from important habitats (Power Line)	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>• Avoid and buffer habitat with high preliminary avian sensitivities.</li> </ul>
	Displacement of resident avifauna through increased disturbance (Power Line)	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>• Avoid and buffer habitat with high preliminary avian sensitivities.</li> </ul>
	Collision when flying into power line infrastructure	Negative High	Negative Medium	<ul style="list-style-type: none"> <li>• Apply bird deterrent devices to the power lines and make use of "bird-friendly" pylon structures.</li> <li>• Avoid the placement of any watering points in close proximity to any overhead electrical infrastructure.</li> <li>• To aid post-construction monitoring and/or monitoring of bird mortality rates, it is advised to conduct direct observations and carcass searches on a regular and systematic basis.</li> <li>• Collisions will be reduced if the grid corridor is placed alongside existing powerlines.</li> </ul>

	Electrocution when perched on power line infrastructure	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>• Avoid the placement of watering points in close proximity to any overhead electrical infrastructure.</li> <li>• Make use of bird-friendly pylons and bird guards as recommended by EWT.</li> </ul>
Aquatic Ecological Assessment (Appendix E1)	Potential spread of alien vegetation	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>• Refer to Construction Phase mitigation (Table 6.3)</li> </ul>
Visual Impact Assessment (Appendix E4)	Visual impact on sensitive visual receptors within a 1km radius from the SEF	Negative Medium	Negative Low	<p>Planning:</p> <ul style="list-style-type: none"> <li>• Retain/re-establish and maintain natural vegetation immediately adjacent to the development footprint.</li> <li>• Where insufficient natural vegetation exists next to the property, a 'screen' can be planted if the landowner requests additional mitigation. This can be done using endemic, fast growers that are water efficient.</li> </ul> <p>Operations:</p> <ul style="list-style-type: none"> <li>• Maintain general appearance of the facility as a whole.</li> </ul>
	Visual impact on sensitive receptors within a 1km radius from the power line	Negative Medium	Negative Low	<p>Planning:</p> <ul style="list-style-type: none"> <li>• Retain/re-establish and maintain natural vegetation immediately adjacent to the development footprint.</li> </ul> <p>Operations:</p> <ul style="list-style-type: none"> <li>• Maintain general appearance of the power line corridor.</li> <li>• Screening can be established near sensitive receptors, upon request, rather than to mitigate the impact at the source.</li> </ul>
	Visual impact on sensitive visual receptors between a	Negative Medium	Negative Low	<p>Planning:</p> <ul style="list-style-type: none"> <li>• Retain/re-establish and maintain natural vegetation immediately adjacent to the development footprint.</li> </ul>



	1km and 3km radius from the SEF			<ul style="list-style-type: none"> <li>Where insufficient natural vegetation exists next to the property, a 'screen' can be planted if the landowner requests additional mitigation. This can be done using endemic, fast growers that are water efficient.</li> </ul> Operations: <ul style="list-style-type: none"> <li>Maintain general appearance of the facility as a whole.</li> </ul>
	Visual impact on sensitive receptors between a 1km and 3km radius from the power line.	Negative Medium	Negative Low	Planning: <ul style="list-style-type: none"> <li>Retain/re-establish and maintain natural vegetation immediately adjacent to the development footprint.</li> </ul> Operations: <ul style="list-style-type: none"> <li>Maintain general appearance of the power line corridor.</li> <li>Screening can be established near sensitive receptors, upon request, rather than to mitigate the impact at the source.</li> </ul>
	Visual impact on sensitive visual receptors within a 3km and 5km radius from the SEF	Negative Medium	Negative Low	Planning: <ul style="list-style-type: none"> <li>Retain/re-establish and maintain natural vegetation immediately adjacent to the development footprint.</li> <li>Where insufficient natural vegetation exists next to the property, a 'screen' can be planted if the landowner requests additional mitigation. This can be done using endemic, fast growers that are water efficient.</li> </ul> Operations: <ul style="list-style-type: none"> <li>Maintain general appearance of the facility as a whole.</li> </ul>
	Visual impact on sensitive receptors between a 3km and 5km radius from the power line.	Negative Low	Negative Low	Planning: <ul style="list-style-type: none"> <li>Retain/re-establish and maintain natural vegetation immediately adjacent to the development footprint.</li> </ul> Operations:

				<ul style="list-style-type: none"> <li>• Maintain general appearance of the power line corridor.</li> <li>• Screening can be established near sensitive receptors, upon request, rather than to mitigate the impact at the source.</li> </ul>
	Visual impact on sensitive visual receptors within a 5-10km radius from the SEF	Negative Low	Negative Low	<p>Planning:</p> <ul style="list-style-type: none"> <li>• Retain/re-establish and maintain natural vegetation immediately adjacent to the development footprint.</li> <li>• Where insufficient natural vegetation exists next to the property, a 'screen' can be planted if the landowner requests additional mitigation. This can be done using endemic, fast growers that are water efficient.</li> </ul> <p>Operations:</p> <ul style="list-style-type: none"> <li>• Maintain general appearance of the facility as a whole.</li> </ul>
	Visual impact on sensitive receptors within a 5-10km radius from the power line	Negative Low	Negative Low	<p>Planning:</p> <ul style="list-style-type: none"> <li>• Retain/re-establish and maintain natural vegetation immediately adjacent to the development footprint.</li> </ul> <p>Operations:</p> <ul style="list-style-type: none"> <li>• Maintain general appearance of the power line corridor.</li> <li>• Screening can be established near sensitive receptors, upon request, rather than to mitigate the impact at the source.</li> </ul>
	Visual impacts of lighting at night on sensitive visual receptors in close proximity to the proposed facility	Negative Medium	Negative Low	<p>Planning &amp; Operation</p> <p>As far as practically possible:</p> <ul style="list-style-type: none"> <li>• Shield the source of light by physical barriers (walls, vegetation etc.)</li> <li>• Limit mounting heights of lighting fixtures, or alternatively use footlights or bollard level lights.</li> </ul>

				<ul style="list-style-type: none"> <li>• Make use of minimum lumen or wattage in fixtures.</li> <li>• Make use of down-lighters, or shield fixtures.</li> <li>• Make use of low-pressure sodium lighting or other types of low impact lighting.</li> <li>• Make use of motion detectors on security lighting. This will allow the site to remain in relative darkness, until lighting is required for security or maintenance purposes.</li> <li>• The use of night vision or thermal security cameras are very effective and can replace security lighting entirely.</li> </ul>
	Visual impacts of glint and glare as a visual distraction and possible air travel hazard	Negative Low	Negative Low	<ul style="list-style-type: none"> <li>• No mitigation measures are required.</li> </ul>
	Visual impacts on sense of place associated with the operational phase of the SEF	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>• It is believed that renewable energy resources are essential to the environmental well-being of the country and planet (WESSA, 2012). Aesthetic issues are subjective, and some people find solar farms and their associated infrastructure pleasant and optimistic while others may find it visually invasive; it is mostly perceived as symbols of energy independence; and local prosperity.</li> <li>• The subjectivity towards the project in its entirety can be influenced by creating a “Green Energy” awareness campaign, educating the local community and potentially tourists on the benefits of renewable energy. This can be achieved by also hosting an ‘open day’ where the local community can have the opportunity to view the completed project which may</li> </ul>

				<p>enlist a sense of pride in the renewable energy project in their area.</p> <ul style="list-style-type: none"> <li>• Implement good housekeeping measures.</li> </ul>
	Visual impacts and sense of place impacts associated with the operation phase of the PL.	Negative Low	Negative Low	<ul style="list-style-type: none"> <li>• It is believed that renewable energy resources are essential to the environmental well-being of the country and planet (WESSA, 2012). Aesthetic issues are subjective, and some people find solar farms and their associated infrastructure pleasant and optimistic while others may find it visually invasive; it is mostly perceived as symbols of energy independence; and local prosperity.</li> <li>• The subjectivity towards the project in its entirety can be influenced by creating a “Green Energy” awareness campaign, educating the local community and potentially tourists on the benefits of renewable energy. This can be achieved by also hosting an ‘open day’ where the local community can have the opportunity to view the completed project which may enlist a sense of pride in the renewable energy project in their area.</li> <li>• Implement good housekeeping measures.</li> </ul>
Social Impact Assessment (Appendix E8)	The creation of employment opportunities and skills development opportunities during the operation phase for the country and local economy	Positive Low	Positive Medium	<p>Enhancement:</p> <ul style="list-style-type: none"> <li>• It is recommended that local employment policy is adopted to maximise the opportunities made available to the local community.</li> <li>• The recruitment selection process should seek to promote gender equality and the employment of women wherever possible.</li> </ul>

				<ul style="list-style-type: none"> <li>• Vocational training programs should be established to promote the development of skills.</li> </ul>
	Development of non-polluting, renewable energy infrastructure	Positive Medium	Positive Medium	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
	Loss of agricultural land and overall productivity as a result of the operation of the proposed project on an agricultural property	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>• The proposed mitigation measures for the construction phase should have been implemented at this stage.</li> </ul>
	Contribution to LED and social upliftment during the operation of the project	Positive Medium	Positive High	<p>Enhancement:</p> <ul style="list-style-type: none"> <li>• A CNA must be conducted to ensure that the LED and social upliftment programmes proposed by the project are meaningful.</li> <li>• Ongoing communication and reporting are required to ensure that maximum benefit is obtained from the programmes identified, and to prevent the possibility for such programmes to be misused.</li> <li>• The programmes should be reviewed on an ongoing basis to ensure that they are best suited to the needs of the community at the time (bearing in mind that these are likely to change over time).</li> </ul>
	The potential impact on tourism due to the establishment of the Carmel Solar 3 SEF	Positive/Negative Low	Positive/Negative Low	<ul style="list-style-type: none"> <li>• Due to the extent of the project no viable mitigation measures can be implemented to eliminate the visual impact of the PV panels, but the subjectivity towards the PV panels can be influenced by creating a “Green Energy” awareness campaign, educating the local community and tourists on the benefits of</li> </ul>

				renewable energy. Tourists visiting the area should be made aware of South Africa's movement towards renewable energy. This might create a positive feeling of a country moving forward in terms of environmental sustainability.
	Visual impacts and sense of place impacts associated with the operation phase of Carmel Solar 3 SEF	Negative Low	Negative Low	<ul style="list-style-type: none"> <li>To effectively mitigate the visual impact and the impact on sense of place during the operational phase of the proposed Carmel Solar 3 SEF, it is suggested that the recommendations made in the Visual Impact Assessment (specialist study) should be followed in this regard.</li> </ul>
	The creation of employment opportunities and skills development opportunities during the operation phase for the households involved in the project would create an opportunity for an increase in household earnings	Positive Low	Positive Medium	<p>Enhancement:</p> <ul style="list-style-type: none"> <li>It is recommended that local employment policy is adopted to maximise the opportunities made available to the local community.</li> <li>With the recruitment of the local community for job creation and increase in household earnings will automatically be seen in the area surrounding the development.</li> </ul>
Traffic Impact Assessment (Appendix E9)	<p>Slight increase in trips due to permanent staff on site.</p> <p>Increase in trips around twice a year for transport of water to site for the cleaning of solar panels (water source to be clarified – borehole or transported to site/size of water tankers if water is to</p>	Negative Low	Negative Low	<ul style="list-style-type: none"> <li>Source on-site water supply if possible.</li> <li>Utilise cleaning systems for the panels needing less vehicle trips.</li> <li>Schedule trips for the provision of water for the cleaning of panels outside peak traffic times as much as possible.</li> </ul>

	be delivered on site)			
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### **6.3.1 Impacts During the Decommissioning Phase**

The physical environment will benefit from the closure of the solar facility since the site will be restored to its natural state. Table 6.5 provides a summary of the impacts during the decommissioning phase. The decommissioning phase will however potentially result in impact on soils, pressure on existing service infrastructure, surface water and the loss of permanent employment. Skilled staff will be eminently employable, and a number of temporary jobs will also be created in the process. Decommissioning of a PV facility will leave a positive impact on the habitat and biodiversity in the area as the area will be rehabilitated to its natural state.

**Table 6.5:** Impacts and the mitigation measures during the decommissioning phase

SPECIALIST STUDY	IMPACT	PRE-MITIGATION RATING	POST MITIGATION RATING	SUMMARY OF MITIGATION MEASURES
Terrestrial Biodiversity Impact Assessment (Appendix E1)	Vegetation Loss and disturbance of natural vegetation due to the removal of infrastructure and need for working sites	Negative Low	Negative Low	<ul style="list-style-type: none"> <li>• No additional clearing of vegetation should take place without a proper assessment of the environmental impacts and authorization from relevant authorities.</li> <li>• If any additional infrastructure needs to be constructed, for example overhead powerlines, communication cables, etc., then these must be located next to existing infrastructure, and clustered to avoid dispersed impacts.</li> <li>• No driving of vehicles off-road.</li> <li>• Implement Alien Plant Management Plan, including monitoring, to ensure minimal impacts on surrounding areas.</li> <li>• Access to sensitive areas outside of development footprint should not be permitted during operation.</li> <li>• Surface runoff and erosion must be properly controlled and any issues addressed as quickly as possible</li> </ul>
	Vegetation Continued establishment and spread of alien invasive plant species due to the presence of migration corridors	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>• Implement an alien management plan, which highlights control priorities and areas and provides a programme for long-term control.</li> <li>• Undertake regular monitoring to detect alien invasions early so that they can be controlled.</li> <li>• Post-decommissioning monitoring should continue for an appropriate length of time to ensure that future problems are avoided.</li> </ul>

	and disturbance vectors			<ul style="list-style-type: none"> <li>Do NOT use any alien plants during any rehabilitation that may be required.</li> </ul>
Avifauna Impact Assessment (Appendix E3)	Displacement of priority avian species from important habitats	Negative Low	Negative Low	<ul style="list-style-type: none"> <li>Avoid the temporary storage (laydown) of removed infrastructure on habitat with a high avian sensitivity.</li> <li>Rehabilitation should make use of indigenous floristic species that are native to the study area.</li> </ul>
	Displacement of resident avifauna through increased disturbance	Negative Low	Negative Low	<ul style="list-style-type: none"> <li>Avoid the temporary storage (laydown) of removed infrastructure on habitat with a high avian sensitivity.</li> <li>Rehabilitation should make use of indigenous floristic species that are native to the study area.</li> </ul>
Aquatic Ecological Assessment (Appendix E1)	Loss of habitat containing protected species or Species of Special Concern	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>Refer to construction mitigation measures (Table 6.3)</li> </ul>
	Loss of CBAs or potential areas with conservation potential	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>Refer to construction mitigation measures (Table 6.3)</li> </ul>
	Loss of riparian and or wetland habitat	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>Refer to construction mitigation measures (Table 6.3)</li> </ul>
	Changes to the hydrological regime and increase potential for erosion	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>Refer to construction mitigation measures (Table 6.3)</li> </ul>

	Changes to surface water quality characteristics	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>Refer to construction mitigation measures (Table 6.3)</li> </ul>
Traffic Impact Assessment (Appendix E9)	<p>Increase in development trips for the duration of the construction Phase</p> <p>Associated noise, dust and exhaust pollution</p>	Negative Medium	Negative Low	<ul style="list-style-type: none"> <li>Refer to construction mitigation measures (Table 6.3)</li> </ul>

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## 7 CUMULATIVE EFFECTS ASSESSMENT

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This section aims to address the requirements of Section 2 of the NEMA to consider cumulative impacts as part of any environmental assessment process.

### 7.1 INTRODUCTION

The EIA Regulations (2017) determine that cumulative impacts, *“in relation to an activity, means the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may become significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities.”* Cumulative impacts can be incremental, interactive, sequential or synergistic. EIAs have traditionally failed to come to terms with such impacts, largely as a result of the following considerations:

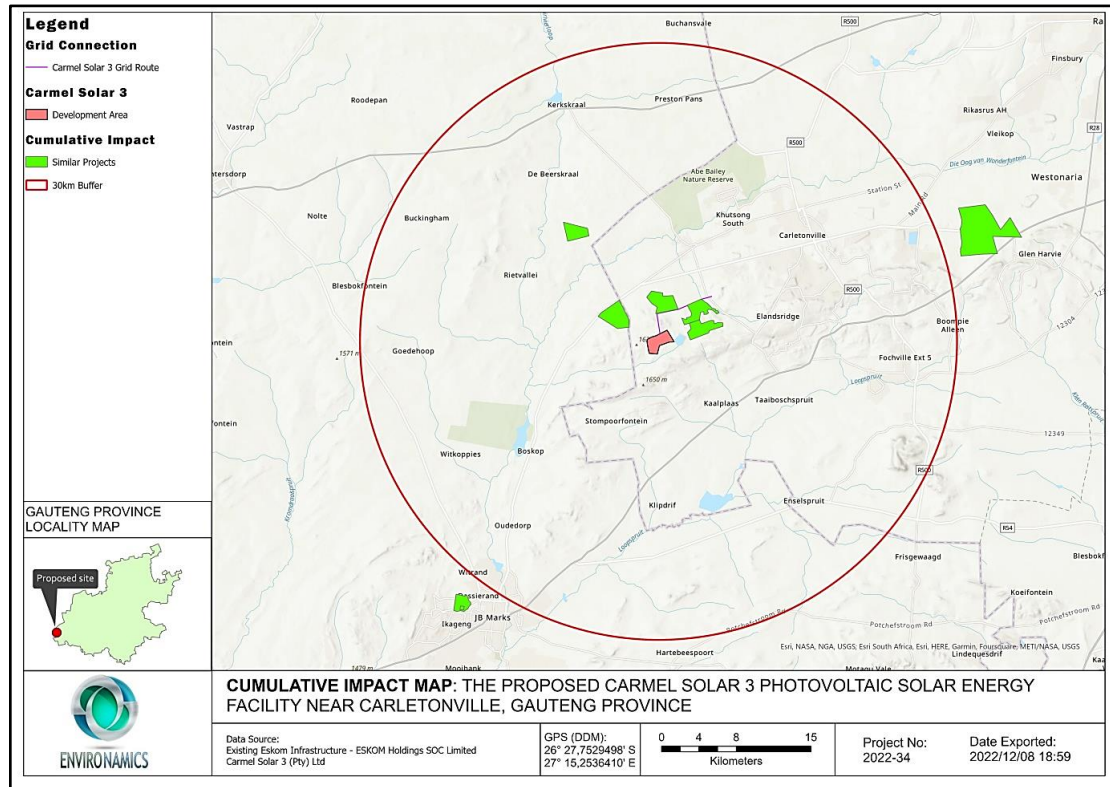
- Cumulative effects may be local, regional or global in scale and dealing with such impacts requires coordinated institutional arrangements;
- Complexity - dependent on numerous fluctuating influencing factors which may be completely independent of the controllable actions of the proponent or communities; and
- Project level investigations are ill-equipped to deal with broader biophysical, social and economic considerations.

Despite these challenges, cumulative impacts have been afforded increased attention in this Scoping Report and for each impact a separate section has been added which discusses any cumulative issues, and where applicable, draws attention to other issues that may contextualise or add value to the interpretation of the impact – refer to Appendix E. This chapter analyses the proposed project’s potential cumulative impacts in more detail by: (1) defining the geographic area considered for the cumulative effects analysis; (2) providing an overview of relevant past and present actions in the project vicinity that may affect cumulative impacts; (3) presenting the reasonably foreseeable actions in the geographic area of consideration; and (4) determining whether there are adverse cumulative effects associated with the resource areas analysed.

The term "Cumulative Effect" has for the purpose of this report been defined as: the summation of effects over time which can be attributed to the operation of the project itself, and the overall effects on the ecosystem of the project area that can be attributed to the project and other existing and planned future projects.

## 7.2 GEOGRAPHIC AREA OF EVALUATION

The geographic area of evaluation is the spatial boundary in which the cumulative effects analysis was undertaken. The spatial boundary evaluated in this cumulative effects analysis generally includes an area of a 30km radius surrounding the proposed development – refer to Figure 7.1 below.



**Figure 7.1:** Geographic area of evaluation with utility-scale renewable energy generation sites and power lines

The geographic spread of PV solar projects, administrative boundaries and any environmental features (the nature of the landscape) were considered when determining the geographic area of investigation. It was argued that a radius of 30km would generally confine the potential for cumulative effects within this particular environmental landscape. The geographic area includes projects located within the Gauteng and North West Provinces. A larger geographic area may be used to analyse cumulative impacts based on the specific temporal or spatial impacts of a resource. For example, the socio-economic cumulative analysis may include a larger area, as the construction workforce may draw from a much wider area. The geographic area of analysis is specified in the discussion of the cumulative impacts for that resource where it differs from the general area of evaluation described above.

### 7.2.1 Temporal Boundary of Evaluation

A temporal boundary is the timeframe during which the cumulative effects are reasonably expected to occur. The temporal parameters for this cumulative effects analysis are the anticipated lifespan of the proposed project, beginning in 2023 and extending out at least

20 years, which is the minimum expected project life of the proposed project. Where appropriate, particular focus is on near-term cumulative impacts of overlapping construction schedules for proposed projects in the area of evaluation.



### 7.3 OTHER PROJECTS IN THE AREA

#### 7.3.1 Existing Projects in the Area

According to the DFFE's database, five (05) solar PV plant applications have been submitted to the Department within the geographic area of investigation - refer to Table 7.1.

**Table 7.1:** A summary of related projects that may have a cumulative impact, in a 30 km radius of the study area

Site name	Distance from study area	Proposed generating capacity	DFFE reference	EIA process	Project status
Carmel Solar 1	1,82km	240 MW	To be confirmed	Scoping and EIA	In Process
Carmel Solar 2	1,62km	240 MW	To be confirmed	Scoping and EIA	In Process
Varkenslaagte Solar	1km	240 MW	To be confirmed	Scoping and EIA	In Process
Turffontein Solar 1	5,31km	240 MW	To be confirmed	Scoping and EIA	In Process
Rooidraai Solar	12,09km	240 MW	To be confirmed	Scoping and EIA	In Process

It is unclear whether other projects not related to renewable energy is or has been constructed in this area, and whether other projects are proposed. In general, development activity in the area is focused on agriculture and mining. It is quite possible that future solar farm development may take place within the general area.

## 7.4 SPECIALIST INFORMATION ON CUMULATIVE EFFECTS

In line with the Terms of Reference (ToR) provided as part of the scoping report, specialists were asked to, where possible, take into consideration the cumulative effects associated with the proposed development and other projects which are either developed or in the process of being developed in the local area – refer to Figure 7.2 for process flow. The following sections present their findings. The following sections present their findings.



**Figure 7.2:** Process flow diagram for determining cumulative effects

### 7.4.1 Soil, Land Capability and Agricultural Potential

According to the Agriculture Compliance Statement (Appendix E5), the cumulative impact of a development is the impact that development will have when its impact is added to the incremental impacts of other past, present or reasonably foreseeable future activities that will affect the same environment.

The most important concept related to a cumulative impact is that of an acceptable level of change to an environment. A cumulative impact only becomes relevant when the impact of

the proposed development will lead directly to the sum of impacts of all developments causing an acceptable level of change to be exceeded in the surrounding area. If the impact of the development being assessed does not cause that level to be exceeded, then the cumulative impact associated with that development is not significant.

The potential cumulative agricultural impact of importance is a regional loss (including by degradation) of future agricultural production potential. The defining question for assessing the cumulative agricultural impact is this: What loss of future agricultural production potential is acceptable in the area, and will the loss associated with the proposed development, when considered in the context of all past, present or reasonably foreseeable future impacts, cause that level in the area to be exceeded?

In quantifying the cumulative impact, the area of land taken out of grazing as a result of the five developments (total generation capacity of 1550 MW) will amount to a total of approximately 3875 hectares. This is calculated using the industry standards of 2.5 and 0.3 hectares per megawatt for solar and wind energy generation respectively, as per the Department of Environmental Affairs (DEA) Phase 1 Wind and Solar Strategic Environmental Assessment (SEA) (2015). As a proportion of the total area within a 30 km radius (approximately 282,700 ha), this amounts to 1.37% of the surface area. That is well within an acceptable limit in terms of loss of land which is only suitable for grazing, of which there is no scarcity in the country. This is particularly so when considered within the context of the following point.

In order for South Africa to develop the renewable energy generation that it urgently needs, agriculturally zoned land will need to be used for renewable energy generation. It is far more preferable to incur a cumulative loss of agricultural land that is of limited agricultural potential than to lose agricultural land that has a higher potential, and that is much scarcer, to renewable energy development elsewhere in the country.

In terms of the loss of agricultural land to renewable energy, it should also be noted that renewable energy development can only be located in fairly close proximity to a substation that has available capacity. This effectively protects most agricultural land in the country from renewable energy development because only a small proportion of the country's total land surface is located in close enough proximity to an available substation to be viable for renewable energy development.

As discussed above, the risk of a loss of agricultural potential by soil degradation can effectively be mitigated for renewable energy developments. The risk for each individual development is low and the cumulative risk is also low.

Due to all of the considerations discussed above, the cumulative impact of loss of future agricultural production potential is assessed as low. It will not have an unacceptable negative impact on the agricultural production capability of the area and it is therefore recommended that the development be approved.

#### **7.4.2 Terrestrial Biodiversity Impact Assessment**

According to the Terrestrial Biodiversity Impact Assessment (refer to Appendix E2), the regional terrestrial vegetation types in the broad study area are listed as Least Concern. Loss of habitat will definitely occur (according to the current layout), but this will be a small area in

comparison to the total area of the vegetation type. The vegetation type occupies an area of 8 945 km<sup>2</sup>, of which approximately 0.2 km<sup>2</sup> occurs on site, an insignificant proportion (0.002%).

The site is already invaded. To construct the proposed infrastructure, alien trees will have to be cleared to a significant degree. The risk of alien invasion into surrounding areas will therefore be reduced or neutral. The significance will therefore be negligible, especially if control measures are implemented.

### **7.4.3 Social Impact Assessment**

According to the Social Impact Assessment (refer to Appendix E8), Carmel Solar 3 SEF and the establishment of other SEFs within the area has the potential to result in significant positive cumulative impacts, specifically with regards to the creation of a number of socio-economic opportunities for the region, which in turn, can result in positive social benefits. The positive cumulative impacts include creation of employment, skills development and training opportunities, and downstream business opportunities. The cumulative benefits to the local, regional, and national economy through employment and procurement of services are more considerable than that of Carmel Solar 3 SEF alone.

While the development of a single solar power project may not result in a major influx of people into an area, the development of several projects may have a cumulative impact on the in-migration and movement of people. In addition, the fact that the project is proposed within an area characterised by good levels of solar irradiation suitable for the development of commercial solar energy facilities implies that the surrounding area is likely to be subject to considerable future applications for PV energy facilities. Levels of unemployment, and the low level of earning potential may attract individuals to the area in search of better employment opportunities and higher standards of living.

It is exceedingly difficult to control an influx of people into an area, especially in a country where unemployment rates are high. It is therefore important that the project proponent implement and maintain strict adherence with a local employment policy in order to reduce the potential of such an impact occurring.

### **7.4.4 Visual**

According to the Visual Impact Assessment (refer to Appendix E4), the anticipated cumulative visual impact for the SEF and power line are expected to include the change in sense of place, as well as the precedent being set for SEFs in the area where currently there is only a precedent for agricultural and mining related activities. Further construction and operation of the SEF in the area is likely to have a negative impact.

The proposed development is located in a close proximity of existing power infrastructure and might have a low cumulative impact on viewers. Several other SEFs are also proposed in the area and the potential for cumulative impacts to occur as a result of the projects are therefore very likely. The visual landscape mainly consists of agricultural and mining developments with a low visual quality. Permanent residents of the area might be desensitised over time with the construction of more SEFs, but will stay subjective for each viewer. The location of the SEFs within the study area will contribute to the consolidation of SEF structures to this locality and

avoid a potentially scattered proliferation of solar energy infrastructure throughout the region.

#### **7.4.5 Heritage**

The Heritage Impact Assessment (Refer to Appendix E6), indicated that from a review of available databases, publications, as well as available heritage impact assessments done for the purpose of developments in the region, it was determined that the Carmel Solar 3 Photovoltaic Solar Energy facility is in an area with a medium presence of heritage sites and features. Heritage resources which can be classified as highly significant (Grade 1) are absent from the region. However, Grade 2 sites, dating to the Late Iron Age as well as the historic times occur sporadically all over.

For the project area, the impacts to heritage sites are expected to be of medium significance. However, this can be ameliorated by implementing mitigation measures, include isolating sites, relocating sites (e.g., burials) and excavating or sampling any significant archaeological material found to occur within the project area. The chances of further such material being found, however, are considered to be negligible. After mitigation, the overall impact significance would therefore be low.

#### **7.4.6 Paleontology**

According to the Palaeontological Impact Assessment (refer to Appendix E7), the geographic spread of PV solar projects, administrative boundaries and any environmental features (the nature of the landscape) were considered when determining the geographic area of investigation. It was argued that a radius of 30km would generally confine the potential for cumulative effects within this particular environmental landscape. The geographic area includes projects located within the Free State Province specific temporal or spatial impacts of a resource. For example, the socioeconomic cumulative analysis may include a larger area, as the construction workforce may draw from a much wider area. The geographic area of analysis is specified in the discussion of the cumulative impacts for that resource where it differs from the general area of evaluation described above.

A temporal boundary is the timeframe during which the cumulative effects are reasonably expected to occur. The temporal parameters for these cumulative effects analysis is the anticipated lifespan of the Proposed Project, beginning in 2024 and extending out at least 20 years, which is the minimum expected project life of the proposed project. Where appropriate, particular focus is on near-term cumulative impacts of overlapping construction schedules for proposed projects in the area of evaluation.

The general Palaeontological Sensitivity of the area is Low to High. However, it is important to note that the quality of preservation of these different sites will most probably vary and it is thus difficult to allocate a Cumulative Sensitivity to the projects. If all the mitigation measures are carried out, a conservative estimate of the Cumulative impacts on fossil Heritage will vary between Low and Medium.

#### **7.4.7 Traffic**

According to the Traffic Impact Assessment (refer to Appendix E9), this is a precautionary approach as in reality, these projects would be subject to a highly competitive bidding process and not all the projects may be selected to enter into a Power Purchase Agreement. Even if all the facilities are constructed and/or decommissioned at the same time, the roads authority will consider all applications for abnormal loads and work with all project companies to ensure that loads on the public roads are staggered and staged to ensure that the impact will be acceptable.

The construction and decommissioning phases of a renewable energy project are the only significant traffic generators. The duration of these phases is short term, i.e., the potential impact of the traffic generated during the construction and decommissioning phases on the surrounding road network is temporary and solar projects, when operational, do not add any significant traffic to the road network.

It is further noted that it is unlikely that all above developments will be constructed at the same time. However, for the event that the developments have similar construction periods, it is recommended to agree on a delivery schedule between the projects to reduce development trips and consequently the impact on the external road network.

## 7.5 IMPACT ASSESSMENT

Following the definitions of the term, the “residual effects on the environment”, i.e., effects after mitigation measures have been put in place, combined with the environmental effects of past, present and future projects and activities will be considered in this assessment. Also, a “combination of different individual environmental effects of the project acting on the same environmental component” can result in cumulative effects.

### 7.5.1 Potential Cumulative Effects

The receptors (hereafter referred to as Valued Ecosystem Components (VECs) presented in Section 6 (refer to the matrix analysis) have been examined alongside other past, present and future projects for potential adverse cumulative effects. A summary of the cumulative effects discussed are summarized in Table 7.2. There have been specific VECs identified with reference to the Solar Project (Table 6.2), which relates to the biophysical and socio-economic environments. Table 7.2 indicates the potential cumulative effects VECs and the rationale for inclusion/exclusion.

**Table 7.2:** Potential Cumulative Effects for the proposed project

	Valued Ecosystem Components (VECs)	Rationale for Inclusion / Exclusion	Level of Cumulative Effect
<b>Construction Phase</b>			
<b>Aquatic Ecology Impact Assessment</b>	Impacts on the aquatic resources of the area	The cumulative impact assessment considers the combined impact of the remaining and other renewable projects within a 30km radius, that are also in the development phase and the associated grid lines on the aquatic resources. The rating below is based on the premise that important or sensitive features will be avoided by the various projects, while the mitigations proposed will ensure that the form and or function of downstream areas remain intact.	- Low
<b>Social Impact Assessment</b>	An increase in employment opportunities, skills development and business opportunities with the establishment of more than one SEF	The establishment of several SEFs under the REIPPP Programme in the area has the potential to have a positive cumulative impact on the area in the form of employment opportunities, skills development and business opportunities. The positive benefits will be enhanced if local employment policies are adopted, and local services providers are utilised by the developers to maximise the project opportunities available to the local community.	+ Medium
	Negative impacts and change to the local economy with an in-migration of labourers,	While the development of a single solar power project may not result in a major influx of people into an area, the development of three other projects may have a cumulative impact on the in-migration	- Medium



	businesses and jobseekers to the area.	<p>and movement of people. In addition, the fact that the project is proposed within an area characterised by good levels of solar irradiation suitable for the development of commercial solar energy facilities implies that the surrounding area is likely to be subject to considerable future applications for PV energy facilities. Levels of unemployment, and the low level of earning potential may attract individuals to the area in search of better employment opportunities and higher standards of living.</p> <p>It is exceedingly difficult to control an influx of people into an area, especially in a country where unemployment rates are high. It is therefore important that the project proponent implement and maintain strict adherence with a local employment policy in order to reduce the potential of such an impact occurring.</p>	
<b>Traffic Impact Study</b>	Further increase of development trips during construction phase if the developments listed in Table 7.1 will be constructed at the same time as the proposed Carmel Solar 3 PV Facility	It is noted that it is unlikely that all developments will be constructed at the same time. However, for the event that the developments have similar construction periods, it is recommended to agree on a delivery schedule between the respective projects.	- Medium
<b>Operational Phase</b>			
<b>Visual Impact Assessment</b>	Cumulative visual impacts related to the SEF and PL.	The anticipated cumulative visual impact for the SEF and power line are expected to include the change in sense of place, as well as the precedent being set for SEFs in the area where currently there is only a precedent for agricultural and mining related activities. Further construction and operation of the SEF in the area is likely to have a negative impact.	- Low
<b>Decommissioning Phase</b>			
<b>General</b>	Generation of waste	During the decommissioning of the facility waste will be generated that will need to be disposed of where recycling and re-use is not available. This may lead to pressure on waste disposal facilities in the area.	- Medium

## 7.6 CONCLUSION

This chapter of the Scoping Report addressed the cumulative environmental effects of the construction, operation and decommissioning project phases to be further assessed as part of the EIA Phase. The information to date has shown that no significant adverse residual impacts are likely. However, cumulative impacts could arise as other similar projects are constructed in the area.

The potential most significant cumulative impacts relate to:

- Cumulative effects during construction phase:
  - Impacts on the aquatic resources of the area (- Low)
  - Impacts of employment opportunities, business opportunities and skills development (+ Medium)
  - Impact with large-scale in-migration of people (- Medium)
  - Further increase of development trips during construction phase if the developments (-Medium)
- Cumulative effects during the operational phase:
  - Visual intrusion (- Medium)
- Cumulative effects during the decommissioning phase:
  - Generation of waste (- Medium)

The cumulative impact for the proposed development is medium to low and no high, unacceptable impacts related to the project are expected. Considering the extent of the project and information presented in section 7 of this report, it can be concluded that the cumulative impacts will not result in large scale changes and impacts on the environment.

Photovoltaic solar energy technology is a clean technology which contributes toward a better-quality environment. The proposed project will contribute to local economic growth by supporting industry development in line with provincial and regional goals and ensuring advanced skills are drawn to the Gauteng Province. No cumulative impacts with a high residual risk have been identified.

In terms of the desirability of the development of sources of renewable energy therefore, it may be preferable to incur a higher cumulative loss in such a region as this one (where the landscape has already experienced degradation), than to lose land with a higher environmental value elsewhere in the country.

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## 8 PLAN OF STUDY FOR EIA

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This section aims to address the following requirements of the regulations:

**Appendix 2.** (2) A scoping report (...) must include -

- (i) a plan of study for undertaking the EIA process to be undertaken, including-
  - (i) a description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity;
  - (ii) a description of the aspects to be assessed as part of the EIA process;
  - (iii) aspects to be assessed by specialists;
  - (iv) a description of the proposed method of assessing the environmental aspects, including a description of the proposed method of assessing the environmental aspects including aspects to be assessed by specialists;
  - (v) a description of the proposed method of assessing duration and significance;
  - (vi) an indication of the stages at which the competent authority will be consulted;
  - (vii) particulars of the public participation process that will be conducted during the EIA process; and
  - (viii) a description of the tasks that will be undertaken as part of the EIA process;
  - (ix) identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored.

### 8.1 INTRODUCTION

This section gives a brief outline of the Plan of Study for EIA (PoSEIA) and the tasks that will be undertaken and the anticipated process to meet the objectives for the EIA phase. The approach to the EIA is to focus on those key issues identified for the preferred alternative. This will ensure that the EIA focuses on the most significant impacts and in the process save time and resources.

## 8.2 ANTICIPATED OUTCOMES OF THE IMPACT ASSESSMENT PHASE

The purpose of the EIA phase is to assess issues identified in the scoping phase and will include an environmental management program (EMPr). The EMPr will provide information on the proposed activity and the manner in which potential impacts will be minimized or mitigated. The EIA report will comply with Appendix 3 and will:

- Determine the policy and legislative context within which the activity is located and document how the proposed activity complies with and responds to the policy and legislative context;
- Describe the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location;
- Identify the location of the development footprint within the preferred site based on an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects of the environment;
- Determine the—
  - (i) nature, significance, consequence, extent, duration and probability of the impacts occurring to inform identified preferred alternatives; and
  - (ii) degree to which these impacts-
    - (aa) can be reversed;
    - (bb) may cause irreplaceable loss of resources, and
    - (cc) can be avoided, managed or mitigated;
- Identify the most ideal location for the activity within the preferred site based on the lowest level of environmental sensitivity identified during the assessment;
- Identify, assess, and rank the impacts the activity will impose on the preferred location through the life of the activity;
- Identify suitable measures to avoid, manage or mitigate identified impacts; and
- Identify residual risks that need to be managed and monitored.

### **8.3 TASKS TO BE UNDERTAKEN**

The following sections describe the tasks that will be undertaken as part of the EIA Phase of the process.

#### **8.3.1 Project Description**

Further technical and supporting information will be gathered to provide a more detailed project description. This will include a detailed and finalised site layout plan that will be compiled once the areas of sensitivity identified in this Scoping Report have been confirmed by the specialists.

#### **8.3.2 Consideration of Alternatives**

The following project alternatives will be investigated in the EIR:

- Design/Layout alternatives: In terms of the actual layout of the proposed PV plant which will only be assessed for the preferred site alternative. A draft facility layout is included in Figure J.

#### **8.3.3 Compilation of Environmental Impact Report (EIR)**

A Draft EIR will be compiled to meet the content requirements as per Appendix 3 of GNR. 326 of the EIA Regulations (as amended) and will also include a draft Environmental Management Programme containing the aspects contemplated in Appendix 4 of GNR326. The Generic EMPr for overhead electricity transmission and distribution infrastructure and the Generic EMPr for the development of the associated substation infrastructure for transmission and distribution of electricity as per Government Notice 435, which were published in Government Gazette 42323 on 22 March 2019, will also be included in the Draft EIR.

#### **8.3.4 Public Participation**

All registered I&APs and relevant State Departments will be given the opportunity to review the Draft Environmental Impact Report in accordance with Regulation R326. A minimum of 30 days commenting period will be allowed and all stakeholders and I&APs will be given an opportunity to forward their written comments within that period. All issues identified during this 30-day review and comment period will be documented and compiled into a Comments and Response Report to be included as part of the Final EIR to be submitted to the DFFE for decision-making on the Application for Environmental Authorisation.

## 8.4 ASPECTS ASSESSED

Table 8.1 below provides a summary of the aspects that have been assessed. The aspects are also linked to specialist information obtained.

**Table 8.1:** Aspects assessed

Aspects	Potential impacts	Specialist studies / technical information
Construction of the PV Solar facility	<ul style="list-style-type: none"> <li>Impacts on the flora and fauna</li> </ul>	Animal Species Compliance Statement; Plant Species Compliance Statement; Terrestrial Biodiversity Impact Assessment; and Avifauna Impact Assessment
	<ul style="list-style-type: none"> <li>Wetlands and riparian areas</li> </ul>	Aquatic Ecology Impact Assessment
	<ul style="list-style-type: none"> <li>Impacts on agricultural potential (soils)</li> </ul>	Soil and Agricultural Compliance Statement
	<ul style="list-style-type: none"> <li>Impacts associated with the geology of the site</li> </ul>	Desktop Geotechnical Assessment
	<ul style="list-style-type: none"> <li>Impacts on existing services infrastructure</li> </ul>	Confirmation from the Local Municipality
	<ul style="list-style-type: none"> <li>Temporary employment, impacts on health and safety</li> </ul>	Social Impact Assessment
	<ul style="list-style-type: none"> <li>Impacts on heritage resources</li> </ul>	Heritage Impact Assessment and Paleontological Impact Assessment
Operation of the PV Solar facility	<ul style="list-style-type: none"> <li>Impacts on the flora and fauna</li> </ul>	Animal Species Compliance Statement; Plant Species Compliance Statement; Terrestrial Biodiversity Impact Assessment; and Avifauna Impact Assessment
	<ul style="list-style-type: none"> <li>Wetlands and riparian areas</li> </ul>	Aquatic Ecology Impact Assessment
	<ul style="list-style-type: none"> <li>Impacts on agricultural potential (soils)</li> </ul>	Soil and Agricultural Compliance Statement

	<ul style="list-style-type: none"> <li>Impacts associated with the geology of the site</li> </ul>	Desktop Geotechnical Assessment
	<ul style="list-style-type: none"> <li>Increased consumption of water</li> </ul>	Confirmed volumes to be provided by the Applicant
	<ul style="list-style-type: none"> <li>Pressure on existing services infrastructure</li> </ul>	Confirmation from the Local Municipality
	<ul style="list-style-type: none"> <li>Visual Impact</li> </ul>	Visual Impact Assessment
	<ul style="list-style-type: none"> <li>Provision of employment and generation of income for the local community</li> </ul>	Social Impact Assessment
Decommissioning of the PV Solar facility	<ul style="list-style-type: none"> <li>Impacts on the flora and fauna</li> </ul>	Animal Species Compliance Statement; Plant Species Compliance Statement; Terrestrial Biodiversity Impact Assessment; and Avifauna Impact Assessment
	<ul style="list-style-type: none"> <li>Socio-economic impacts (loss of employment)</li> </ul>	Social Impact Assessment
Cumulative Impacts	<ul style="list-style-type: none"> <li>Cumulative biophysical impacts resulting from similar developments in close proximity to the proposed activity.</li> </ul>	All independent specialist studies results to be considered and analysed by the EAP

#### 8.4.1 Specialist Studies

Based on the initial descriptions of potential environmental impacts or aspects (refer to Table 6.2), specialists have been subcontracted to assess the potential impacts that may be significant. The specialist studies assess impacts on both the social and the biophysical environment and also help in identifying ways that can help to mitigate the envisaged impacts. The following specialist studies have been included to address the potentially most significant impact as identified during the scoping phase – refer to Table 6.2:

- Geotechnical report: To determine whether the geotechnical conditions at the site are favorable for the development and construction of a solar PV plant.
- Heritage Impact Assessment: To determine whether the proposed activity will impact on any heritage or archeological artifacts.
- Terrestrial Biodiversity Impact Assessment: To determine what the impact of the proposed activity will be on the ecosystem.

- Animal Species Compliance Statement: To determine what the impact of the proposed activity will be on the faunal community.
- Plant Species Compliance Statement: To determine what the impact of the proposed activity will be on the flora community.
- Aquatic Ecology Impact Assessment: To determine the impact of the proposed activity on the wetlands present on Remaining Extent, Portion 1 and Portion 3 of the Farm Kleinfontein No. 141; Portion 4 of the Farm Turffontein No. 126; and Portions 1, 11, 23 and 28 of the Farm Doornfontein No. 118.
- Avifauna Impact Assessment: To determine what the impacts of the proposed activity will have on the birds (avifauna) in the area.
- Visual Impact Assessment: To determine to what extent the proposed activity will be visually intrusive to the surrounding communities or other receptors.
- Soil and Agricultural Compliance Statement: To determine how the proposed activity will impact on soil and agricultural resources.
- Social Impact Assessment: To determine how the proposed activity will impact on the socio-economic environment.
- Palaeontological Impact Assessment: To determine the impacts on palaeontological resources.
- Traffic Impact Assessment: To determine the impacts on road users on long haul routes and roads around the project area.

#### **8.4.2 Terms of Reference for Specialist Studies**

Specialists in their field of expertise will consider baseline data and identify and assess impacts according to predefined rating scales (section 8.5). Specialists will also suggest optional or essential ways in which to mitigate negative impacts and enhance positive impacts. Further, specialists will, where possible, take into consideration the cumulative effects associated with this and other projects which are either developed or in the process of being developed in the local area. The specialist is reminded to follow the latest DFFE protocols.

The results of these specialist studies have been integrated into the draft Scoping Report. The general requirements proposed for the inputs are presented below and specialists are encouraged to comment and provide input on these. The Terms of Reference (ToR) for each specialist study are include as Appendix E11 to the report.



### 8.4.3 General Requirements

Specialists' reports must comply with Appendix 6 of GNR. 326 published under sections 24(5), and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended and whereby the following are to be included:

- The details of-
  - the specialist who prepared the report; and
  - the expertise of that specialist to compile a specialist report including a curriculum vitae;
- A declaration that the specialist is independent in a form as may be specified by the competent authority;
- An indication of the scope of, and the purpose for which, the report was prepared;
  - An indication of the quality and age of base data used for the specialist report;
  - A description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;
- The duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment;
- A description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used;
- Details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;
- An identification of any areas to be avoided, including buffers;
- A map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;
- A description of any assumptions made and any uncertainties or gaps in knowledge;
- A description of the findings and potential implications of such findings on the impact of the proposed activity, or activities;
- Any mitigation measures for inclusion in the EMPr;
- Any conditions for inclusion in the environmental authorisation;
- Any monitoring requirements for inclusion in the EMPr or environmental authorisation;
- A reasoned opinion-

- whether the proposed activity, activities or portions thereof should be authorised;
  - regarding the acceptability of the proposed activity or activities; and
- if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan;
- A description of any consultation process that was undertaken during the course of preparing the specialist report;
- A summary and copies of any comments received during any consultation process and where applicable all responses thereto; and
- Any other information requested by the competent authority.

In addition to the above, specialists are expected to:

- Review the Scoping Report, with specific reference to the Comments and Response Report to familiarize with all relevant issues or concerns relevant to their field of expertise;
- In addition to the impacts listed in the Scoping Report, identify any issue or aspect that needs to be assessed and provide expert opinion on any issue in their field of expertise that they deem necessary in order to avoid potential detrimental impacts;
- Assess the degree and extent of all identified impacts (including cumulative impacts) that the preferred project activity and its proposed alternatives, including that of the no-go alternative, may have;
- Identify and list all legislation and permit requirements that are relevant to the development proposal in context of the study;
- Reference all sources of information and literature consulted; and
- Include an executive summary to the report.

## 8.5 METHOD OF ENVIRONMENTAL ASSESSMENT

The environmental assessment aims to identify the various possible environmental impacts that could result from the proposed activity. Different impacts need to be evaluated in terms of its significance and in doing so highlight the most critical issues to be addressed.

Significance is determined through a synthesis of impact characteristics which include context and intensity of an impact. Context refers to the geographical scale i.e., site, local, national or global whereas intensity is defined by the severity of the impact e.g., the magnitude of deviation from background conditions, the size of the area affected, the duration of the impact and the overall probability of occurrence. Significance is calculated as shown in Table 8.2.

Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The total number of points scored for each impact indicates the level of significance of the impact.

### 8.5.1 Impact Rating System

Impact assessment must take account of the nature, scale and duration of impacts on the environment whether such impacts are positive or negative. Each impact is also assessed according to the project phases:

- planning
- construction
- operation
- decommissioning

Where necessary, the proposal for mitigation or optimisation of an impact should be detailed. A brief discussion of the impact and the rationale behind the assessment of its significance should also be included. The rating system is applied to the potential impacts on the receiving environment and includes an objective evaluation of the mitigation of the impact. In assessing the significance of each impact the following criteria is used:

**Table 8.2:** The rating system

NATURE		
Include a brief description of the impact of environmental parameter being assessed in the context of the project. This criterion includes a brief written statement of the environmental aspect being impacted upon by a particular action or activity.		
GEOGRAPHICAL EXTENT		
This is defined as the area over which the impact will be experienced.		
1	Site	The impact will only affect the site.

2	Local/district	Will affect the local area or district.
3	Province/region	Will affect the entire province or region.
4	International and National	Will affect the entire country.
<b>PROBABILITY</b>		
This describes the chance of occurrence of an impact.		
1	Unlikely	The chance of the impact occurring is extremely low (Less than a 25% chance of occurrence).
2	Possible	The impact may occur (Between a 25% to 50% chance of occurrence).
3	Probable	The impact will likely occur (Between a 50% to 75% chance of occurrence).
4	Definite	Impact will certainly occur (Greater than a 75% chance of occurrence).
<b>DURATION</b>		
This describes the duration of the impacts. Duration indicates the lifetime of the impact as a result of the proposed activity.		
1	Short term	The impact will either disappear with mitigation or will be mitigated through natural processes in a span shorter than the construction phase (0 – 1 years), or the impact will last for the period of a relatively short construction period and a limited recovery time after construction, thereafter it will be entirely negated (0 – 2 years).
2	Medium term	The impact will continue or last for some time after the construction phase but will be mitigated by direct human action or by natural processes thereafter (2 – 10 years).
3	Long term	The impact and its effects will continue or last for the entire operational life of the development, but will be mitigated by direct human action or by natural processes thereafter (10 – 30 years).
4	Permanent	The only class of impact that will be non-transitory. Mitigation either by man or natural process will not

		occur in such a way or such a time span that the impact can be considered indefinite.
<b>INTENSITY/ MAGNITUDE</b>		
Describes the severity of an impact.		
1	Low	Impact affects the quality, use and integrity of the system/component in a way that is barely perceptible.
2	Medium	Impact alters the quality, use and integrity of the system/component but system/component still continues to function in a moderately modified way and maintains general integrity (some impact on integrity).
3	High	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component is severely impaired and may temporarily cease. High costs of rehabilitation and remediation.
4	Very high	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component permanently ceases and is irreversibly impaired. Rehabilitation and remediation often impossible. If possible rehabilitation and remediation often unfeasible due to extremely high costs of rehabilitation and remediation.
<b>REVERSIBILITY</b>		
This describes the degree to which an impact can be successfully reversed upon completion of the proposed activity.		
1	Completely reversible	The impact is reversible with implementation of minor mitigation measures.
2	Partly reversible	The impact is partly reversible but more intense mitigation measures are required.
3	Barely reversible	The impact is unlikely to be reversed even with intense mitigation measures.
4	Irreversible	The impact is irreversible and no mitigation measures exist.

<b>IRREPLACEABLE LOSS OF RESOURCES</b>		
This describes the degree to which resources will be irreplaceably lost as a result of a proposed activity.		
1	No loss of resource	The impact will not result in the loss of any resources.
2	Marginal loss of resource	The impact will result in marginal loss of resources.
3	Significant loss of resources	The impact will result in significant loss of resources.
4	Complete loss of resources	The impact is result in a complete loss of all resources.
<b>CUMULATIVE EFFECT</b>		
This describes the cumulative effect of the impacts. A cumulative impact is an effect which in itself may not be significant but may become significant if added to other existing or potential impacts emanating from other similar or diverse activities as a result of the project activity in question.		
1	Negligible cumulative impact	The impact would result in negligible to no cumulative effects.
2	Low cumulative impact	The impact would result in insignificant cumulative effects.
3	Medium cumulative impact	The impact would result in minor cumulative effects.
4	High cumulative impact	The impact would result in significant cumulative effects
<b>SIGNIFICANCE</b>		
Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The calculation of the significance of an impact uses the following formula: (Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity.		
The summation of the different criteria will produce a non-weighted value. By multiplying this value with the magnitude/intensity, the resultant value acquires a weighted characteristic which can be measured and assigned a significance rating.		
Points	Impact significance rating	Description
6 to 28	Negative low impact	The anticipated impact will have negligible negative effects and will require little to no mitigation.
6 to 28	Positive low impact	The anticipated impact will have minor positive effects.

29 to 50	Negative medium impact	The anticipated impact will have moderate negative effects and will require moderate mitigation measures.
29 to 50	Positive medium impact	The anticipated impact will have moderate positive effects.
51 to 73	Negative high impact	The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact.
51 to 73	Positive high impact	The anticipated impact will have significant positive effects.
74 to 96	Negative very high impact	The anticipated impact will have highly significant effects and are unlikely to be able to be mitigated adequately. These impacts could be considered "fatal flaws".
74 to 96	Positive very high impact	The anticipated impact will have highly significant positive effects.

## 8.6 CONSULTATION WITH THE COMPETENT AUTHORITY

Consultation with the competent and commenting authorities will continue throughout the duration of impact assessment phase. The authorities will also comment on whether they deem it necessary to conduct additional specialist studies other than what is proposed already in this PoSEIA. On-going consultation will include:

- Submission of the Final EIR following a 30-day public review period (and consideration of comments received).
- Arrangements will be made to discuss the report with the Environmental Officer responsible for the project during the review period, where required.

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## 9 CONCLUSION

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This Draft Scoping Report is aimed at identifying the 'scope' of the EIA that will be conducted in respect of the activity for which authorization is being applied for. It can be concluded that:

- The scoping phase complied with the specifications set out in Regulations 21 and Appendix 2 of GNR326.
- All key consultees have been consulted as required by the Regulations 39 to 44.

Based on the contents of the report the following key environmental issues were identified which need to be addressed in the EIA report:

- Impacts during construction phase:
  - Direct habitat destruction (- Medium)
  - Habitat Fragmentation (- Medium)
  - Impact on the characteristics of the watercourse (- Medium)
  - Creation of direct and indirect employment opportunities (+ Medium)
  - Economic multiplier effects from the use of local goods and services (+ Medium)
  - Impacts on daily living patterns (- Medium)
- Impacts during the operational phase:
  - Habitat destruction and fragmentation (- Medium)
  - Displacement of priority avian species from important habitats (- Medium)
  - Impact on the characteristics of the watercourse (- Medium)
  - Creation of employment opportunities and skills development. (+ Medium)
  - Development of non-polluting, renewable energy infrastructure. (+ Medium)
  - Contribution to LED and social upliftment (+ High)
- Impacts during the decommissioning phase:
  - Improvement of habitat through revegetation / succession over time (+ Medium)
- Cumulative biophysical impacts resulting from similar development in close proximity to the proposed activity.

No fatal flaws or impacts of a high significance has been identified to be associated with the proposed development. The issues identified will be addressed in more detail in the EIA report as part of the EIA Phase.



Considering the technical constraints present within the development footprint, the Applicant has proposed a draft facility layout which considers these aspects, and thereby aim to avoid any direct impact on these features. The draft layout will be further assessed and optimised as part of the EIA Phase of the project to ensure that the development footprint within the affected property is appropriate from an environmental perspective, and thereby avoids the present sensitive environmental features and areas as identified by the independent specialists, Refer to Figure J for the draft layout proposed for development.

The EAP therefore recommends that:

The scoping report be approved after which the EIA process, as required by Regulations 23 to 24 may commence.

We trust that the Department of Forestry, Fisheries and the Environment find the report in order and we eagerly await your comments in this regard.

**Ms. Roschel Maharaj**

Environamics Environmental Consultants



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## 10 REFERENCES

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