
ALLEPAD PV THREE SOLAR ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE NEAR UPINGTON, NORTHERN CAPE PROVINCE

DEA Ref.No14/12/16/3/3/2/1107

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All written comments received since the announcement of the Environmental Impact Assessment process in October 2018, during the Scoping Report's review and comment period (30-day review and comment period from Friday, 12 October 2018 to Monday, 12 November 2018) and comments raised during the Environmental Impact Assessment Report's review and comment period (Thursday, 28 February 2019 to Monday, 01 April 2019) are included in this Comments and Responses Report.

NOTE:

In terms Regulation 44(1) of the EIA Regulations of December 2014 (as amended on 07 April 2017), please note that the comments raised and responses provided at the various Focus Group Meetings held during the 30-day review period of the Basic Assessment Report have not been captured in this Comments and Responses Report. The notes of the meetings are attached as **Appendix C7**.

List of Abbreviations / Acronyms

ATNS	Air Traffic Navigation Services	DAFF	Department of Agriculture, Forestry and Fisheries
DEA	Department of Environmental Affairs	SAHRA	South African heritage Resource Agency
SANRAL	South African National Roads Agency	SARAO	South African Radio Astronomy Observatory

1. COMMENTS RECEIVED BY ORGANS OF STATE AND KEY STAKEHOLDERS DURING IMPACT ASSESSMENT REPORT REVIEW PERIOD

No.	Comment	Raised By	Response
1.	The application form and draft Environmental Impact Report (EIAr) dated February 2019 and received by this Department on 28 February 2019 and acknowledged on 05 March 2019 refers.	Ms Thando Booie Chief Director: Integrated Environmental Authorisation DEA	
1.1.	<p><u>The Department has noted that the draft EIAr has complied with the requirements of the EIA regulation, 2014 as amended.</u></p> <ul style="list-style-type: none"> Detailed motivation not to consider other alternative sites was provided in the Draft EIAr. Also the alternative for placement for Solar PV and associated infrastructure outside the sensitive areas were considered in the report. Efficient public participation process during circulation of the final scoping report was undertaken and comments were addressed in the draft EIAr. The report has assessed the proposed development impacts in detail and efficient mitigation measures for the identified impacts were recorded in the report. 	Letter: 20-03-2019	The applicant and EAP take note that the alternatives included, the public participation process undertaken and the assessment of impacts is in line with the requirements of the EIA Regulations of 2014, as amended.
1.2.	<p><u>However, the Department draws attention to the following:</u></p> <ul style="list-style-type: none"> Ensure that the layout plan for each of the Allepad development footprint with the specific Allepad project highlighted to give an overall representation of the infrastructures for the proposed development. A layout plan overlaid by the sensitive features which shows the location of the proposed development infrastructure and structure together with the existing structures must be submitted with the final EIAr. Further ensure that all are clearly indicated on the legend of the sensitivity layout plan. Furthermore, you are reminded to ensure that all issues 		<p>A layout plan depicting the development footprint for Allepad PV Three has been included within Appendix M of the final EIA Report. This plan provides a representation of the infrastructure proposed for Allepad PV Three.</p> <p>A layout plan depicting the development footprint overlaid by the environmental sensitivities identified for Allepad PV Three has been included within Appendix M of the final EIA Report.</p> <p>The legend of the layout map and sensitivity layout plan clearly indicates all infrastructure and features identified.</p> <p>All issues raised and comments received during the 30-day public review</p>

No.	Comment	Raised By	Response
	<p>raised and comments received during the circulation of the draft EIA from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIA.</p> <ul style="list-style-type: none"> • Also ensure that proof of correspondence with the various stakeholders during the draft EIA must be included in the final EIA. • Should you be unable to obtain comments proof of the attempts that were made to obtain comments must be submitted to the Department for consideration. 		<p>period from registered I&APs and organs of state have been adequately addressed, where relevant, in this final EIA Report.</p> <p>Proof of correspondence with various stakeholders is attached in Appendix C4 (organs of state correspondence) and Appendix C5 (stakeholder correspondence) of this final EIA Report.</p> <p>Proof of attempts that were made to obtain comments is attached in Appendix C4 (organs of state correspondence) and Appendix C5 (stakeholder correspondence) of this final EIA Report.</p>
1.3.	<p><u>General Comments</u></p> <p>The Public Participation Process must be conducted in terms of Regulations 39,40,41,42,43 and 44 of the EIA Regulations 2014 ,as amended</p> <p>You are further reminded that the final EIR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Environmental Impact Assessment Report in accordance with Appendix 3 and Regulation 23(1) of the EIA Regulations 2014.</p> <p>Further note that in terms of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless and extension has been granted in terms of Regulation 3(7).</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.</p>		<p>The Public Participation Process is being conducted in accordance with Regulations 39, 40 41, 42, 43 and 44 of the 2014 EIA Regulations (GNR 326) as amended. An overview of the Public Participation Process is provided in Chapter 6, Section 6.4.3 of the Final EIA Report.</p> <p>The Final EIA Report complies with the requirements in terms of the scope of assessment and has been compiled in accordance with Appendix 3 and Regulation 23(1) of the EIA Regulations 2014.</p> <p>It is acknowledged by the applicant and the EAP that the application will lapse if the applicant fails to meet any of the prescribed timeframes in terms of the EIA Regulations of 2014, as amended.</p> <p>The applicant is cognisant of the need to comply with Section 24F of NEMA with regards to commencing with listed activities. No activities have or will commence on site prior to environmental authorisation being granted by the DEA.</p>

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2.	<p>RECOMMENDATIONS AND DECISION</p> <p>As mentioned in the report, the Department takes note that the proposed activity at the above mentioned location will include Development of Allepad PV Three and associated infrastructure. The Department has evaluated the said draft Environmental Impact Assessment Report and has no objection to the approval of the Environmental Impact Assessment Report. However, the following should be addressed by the applicant before approval of the Scoping Report:</p>	<p>Ms V Ramugondo Director: Institutional Establishment</p> <p>DWS</p> <p>Letter: 29-03-2019</p>	<p>It is acknowledged that the Department has no objection to the approval of the EIA Report for Allepad PV Three.</p>
2.1.	<p>It is apparent that the nature of activities the applicant is proposing to engage in has potential impacts on the environment and water resources, as the area to be developed has perennial rivers and non-perennial rivers.</p>		<p>While non-perennial rivers and dry watercourses have been identified within the project site, these areas are considered to be no-go areas and are avoided by the development footprint of the facility.</p>
2.2.	<p>Please note, the Department rates all perennial and non-perennial streams together with all dry river beds and natural drainage, pans, wetlands and associated riparian areas extremely sensitive to any development;</p>		<p>The applicant and EAP acknowledges that the Department rates all perennial and non-perennial streams together with all dry river beds and natural drainage, pans, wetlands and associated riparian areas as extremely sensitive to any development. It should be noted that all features listed above are considered to be no-go areas and have been avoided by the development footprint of Allepad PV Three.</p>
2.3.	<p>The applicant is therefore advised to apply and obtain the water use authorisation prior to commencement of the proposed activities. The applicant should send the intent to apply for a water use authorisation to the Department;</p>		<p>The applicant acknowledges that a water use authorisation is required prior to the commencement of construction activities and, should any water uses be triggered, will provide the Department with the intent to apply for a water use authorisation should the project be selected as a preferred bidder in the Department of Energy's Renewable Energy Independent Power Producer Procurement (REIPPP) Programme.</p>
2.4.	<p>No activity may occur within the 1:100 year flood line/ 100 meters (whichever is furthest) of a river/drainage channel without authorization. No activity may occur within 500 metres of a pan/wetland (perennial/ non perennial) without authorization, a risk matrix has to be conducted by an Aquatic/Wetland and or Freshwater specialist (must be</p>		<p>It is acknowledged that no activity may occur within the 1:100 year flood line/ 100 meters (whichever is furthest) of a river/drainage channel without authorisation.</p>

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	a suitably qualified professional SACNASP member) and submitted to the Department in order to determine the impacts of the proposed activities on watercourses.		
2.5.	It must be clear on the report, during the construction phase whether the drainage lines will be closed;		The drainage features identified within the project site are considered to be of very high ecological and avifauna sensitivity and are regarded as unsuitable for development. These drainage lines will be avoided during the construction phase.
2.6.	Rubbish bins and Enviro loos/mobile toilets must be there and enough for the people on site during construction. A letter of consent from a registered waste facility to allow contractor to empty the toilet facility at their sewer system should be submitted to our department;		Objective 17 included in the construction management programme of the EMPr (Appendix I of the final EIA Report) provides measures for the appropriate handling and disposal of waste (including sewage) during the construction. Written agreement will be provided to this Department once it has been obtained, prior to construction.
2.7.	All sewage, grey and wash water, as well as any waste generated during the construction phase of the facilities will be collected, contained and disposed of at the permitted and / or licensed facilities of the Local Authority and this must please be confirmed in writing by the local authority;		All sewage and waste generated by the project will be collected by a registered service provider to be disposed of at an approved facility off-site. Written agreement will be provided to this Department once it has been obtained, prior to construction.
2.8.	As mentioned in the report page 23, Allepad PV Three will utilize water during the construction and operation from Dawid Kruper Local Municipality to satisfy the proposed development facility. Therefore, a service provider agreement between Dawid Kruper Local Municipality and ILEnergy Development (Pty) Ltd must be provided. However, should you option to consider using ground water it is advisable to consult the Department of Water and Sanitation prior to that.		The request for confirmation of capacity has been submitted to the Dawid Kruper Local Municipality and has been included in Appendix L of this EIA Report. Although no written confirmation has been received, it was confirmed that the Municipality has capacity to meet the project's water requirements during a meeting held on 21 February 2019 (refer to Appendix L2 for minutes of the meeting).
2.9.	A pre-consultation meeting has to be arranged with the Department to advice on the water uses that are triggered by the activity which require authorisation and relevant reports (including before submission of the complete application to Department);		The applicant acknowledges that a pre-consultation meeting needs to be arranged with the DWS should a water use license be required. Such a meeting will be arranged should the project be selected as a preferred bidder.
2.10.	The disposal of general waste and that of hazardous waste		Objectives 17 and 18 included in the construction management

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	must be carried out in an environmentally safe way as to prevent and/or minimize the potential for pollution of water resources and the collection of which should be done by an accredited waste collector. All applicable Sections of the National Water Act (No. 36 of 1998) and/or the National Environmental Management: Waste Act (No. 59 of 2008) should be strictly adhered to;		programme and Objective 8 of the operation management programme of the EMPr (Appendix I of the final EIA Report) provide measures for the appropriate handling and disposal of general and hazardous waste during the construction. The applicant is cognisant of the National Water Act (No. 36 of 1998) and the National Environmental Management: Waste Act (No. 59 of 2008), and will adhere to the relevant requirements within these.
2.11.	Sections 19 & 20 of the National Water Act, 1998 (Act No.36 of 1998) should always be adhered to;		Sections 19 & 20 of the National Water Act, 1998 (Act No.36 of 1998) will be adhered to by the applicant.
	This reply does not grant any exemption from the requirements of any applicable Act, Ordinance, Regulation or By-law.		It is acknowledged that the comment received on 28 March 2019 does not provide any exemption from the requirements of any applicable Act, Ordinance, Regulation or By-law.
	This office reserves the right to revise initial comments and request additional information that may arise from correspondence and/or upon inspection.		It is acknowledged that the DWS may revise their initial comments and request additional information.
3.	The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit does not accept the assessment of palaeontological resources as it does not comply with the 2012 SAHRA Minimum Standards: Palaeontological Components of Heritage Impact Assessments. Further comments will be issued upon receipt of a compliant report.	Ms Natasha Higgitt Heritage Officer SAHRA Letter: 20-03-2019	It has been noted that the Palaeontological component of the Heritage Impact Assessment does not comply with the 2012 SAHRA Minimum Standards. The Palaeontological Report in the format required by the SAHRA has been uploaded to SAHRIS on 02 April 2019. It must be noted that the Palaeontological Report does not contain any new information, and was only reformatted to comply with the format required by the SAHRA. No final comment has been received by SAHRA to date.
4.	The Department of Water and Sanitation (DWS) hereby acknowledges receipt of the Environmental Impact Assessment Report for the proposed Allepad PV One, Allepad PV Two, Allepad PV Three and Allepad PV Four for development of the four 100MW PV projects and associated infrastructures near Upington: Northern Cape Department takes note of the proposed activity and therefore provides the following comments.	Mr A Abrahams Department of Water and Sanitation, Northern Cape Letter: 01-04-2019	
4.1.	Please note that taking of water from a water resource		It is acknowledged that taking water from a water resource requires

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	during construction or operation of the project needs to be authorized by this department.		authorisation from the DWS. It should be noted that it is the intention of the developer to obtain water from the Dawid Kruiper Local Municipality and will not be taken from a water resource.
4.2.	Installation of septic tanks and ablution facilities as listed on page III and IV of the EIA report at construction camps needs to be authorized by this Department		It is acknowledged that the installation of septic tanks and ablution facilities requires authorisation from the DWS.
4.3.	Waste needs to be collected and disposed of at a registered municipal site during and after construction, and written agreement should be provided to this department		Objective 17 included in the construction management programme of the EMPr (Appendix I of the final EIA Report) provide measures for the appropriate handling and disposal of waste during the construction. This includes disposal of waste at a registered municipal site during and after construction. Written agreement will be provided to this Department once it has been obtained, prior to construction.
4.4.	Development near ephemeral streams needs to be authorized by this department		It is acknowledged that development near ephemeral streams (i.e. within the regulated area) needs to be authorised by this Department.
4.5.	Storm water must be managed in such a manner as to disperse runoff and to prevent the concentration of storm water flow		A storm water management plan has been compiled and included as Appendix G in the EMPr. The plan contains measures to manage runoff and to prevent the concentration of storm water flow. A detailed stormwater management plan is required to be compiled prior to construction of the facility.
4.6.	Any other water use(s), subject to the National Water Act 36(1998), section 21, must be adhered to and authorized by this department, if applicable to this application		It is acknowledged that any other water uses applicable to the project, should be authorised and adhered to.
5.	<p>Departmental Mandate The Directorate: Forestry Management (other regions) in the Department of Agriculture, Forestry and Fisheries (DAFF) is responsible for administration of the National Forests Act, Act 84 of 1998 (NFA) and the National Veld and Forest Fires Act, Act 101 of 1998 as amended. The developer must take note of the following sections of the NFA.</p> <p>Section 12(1) The Minister Declare (a) A particular tree,</p>	<p>Jacoline Mans Chief Forester: NFA Regulation DAFF</p> <p>Letter 01-04-2019</p>	<p>The requirements of Section 12(1) of the National Forests Act, 1998 (Act No. 84 of 1998) is acknowledged and has been forwarded to the applicant for their attention and consideration.</p> <p>The requirements of Section 15(1) of the National Forests Act, 1998 (Act No. 84 of 1998) is acknowledged and has been forwarded to the applicant for their attention and consideration.</p> <p>Implications of the contravention of the National Forests Act, 1998 (Act No. 84 of 1998) in terms of related points (i) and (ii) of the National Forests</p>

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	<p>(b) A particular group of trees, (c) A particular woodlands; or (d) Trees belonging to a particular species, to be a protected tree, group of trees woodland or species</p> <p>Section 15 (1) "No person may (a) Cut, disturb, damage or destroy any protected tree; 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 – (i) Under a license granted by the Minister; or (ii) In terms of an exemption from the provision of this subsection published by the Minister in the Gazette on the advice of the council."</p> <p>"Any person who contravenes the prohibition on – (i) The cutting, disturbance, damage or destruction of temporarily protected trees or groups of trees referred to in section14(2) or protected trees referred to in section 15(1)(a); or (ii) The possession, collection, removal, transport, export, purchase or sale of temporarily protected trees referred to in section (15)(1)(b), or any forest product derived from a temporarily protected tree, group of trees or protected tree, is guilty of a first category offence.</p>		<p>Act, 1998 (Act No. 84 of 1998) is acknowledged and has been forwarded to the applicant for their attention and consideration.</p> <p>The requirements of Section 58(1) of the National Forests Act, 1998 (Act No. 84 of 1998) is acknowledged and has been forwarded to the applicant for their attention and consideration.</p> <p>The most recent publication in GN536 of 7 September 2018 of the list of protected tree species under Section 12(1)(d) of the National Forests Act, 1998 (Act No. 84 of 1998) is acknowledged and has been forwarded to the applicant for their attention and consideration. The ecologist identified three protected tree species on the project site, i.e.; <i>Acacia erioloba</i>; <i>Acacia haematoxylon</i> and <i>Boscia albitrunca</i></p>

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	<p>Section 58(1): "Any person who is guilty of a first category offence referred to in sections 62 and 63 may be sentenced to a fine or imprisonment for a period of up to three years, or to both a fine and such imprisonment."</p> <p>The list of protected tree species under section 12(1)(d) of the National Forests Act, 1998 (Act No 84 of 1998) is published annually, the most recent publication was GN36 of 7 September 2018.</p>		
6.	Comments of Ecology Impact Assessment		
6.1.	<p>The affected vegetation types are Kalahari Karroid Shrubland and Gordonia Duneveld. The specialist reports confirmed the presence of three NFA listed protected trees at all four sites. The species are: <i>Acacia erioloba</i>; <i>Acacia haematoxylon</i> and <i>Boscia albitrunca</i>. The report did not give an indication of the numbers of protected trees to be affected per PV development (each with a development footprint of ±250 ha). The developer must apply for a NFA License prior to disturbance of protected trees, after getting the Environmental authorisation.</p>		<p>The ecologist has identified three protected tree species; <i>Acacia erioloba</i>; <i>Acacia haematoxylon</i> and <i>Boscia albitrunca</i>. All three of these species are associated with the dune field areas located within the eastern portion of the project site. The applicant will apply for an NFA License prior to the disturbance of protected trees within the development footprint.</p>
6.2.	<p>Getting a Forest Act License can take up to 30 days. License application forms are available on the Department website or at the Forestry Office in Upington. The Department may as supporting documentation when assessing a license application. For construction activities of this nature, the following supporting documents are normally requested:</p> <ul style="list-style-type: none"> - <i>Completed License Application Form</i> - <i>Accurate estimation of the number of trees to be felled per species</i> - <i>Copy of the I.D of the applicant (developer's representative)</i> 		<p>The applicant takes note of the documents normally requested when applying for a Forest Act License, as well as the timeframes for obtaining a license.</p>

No.	Comment	Raised By	Response
	<ul style="list-style-type: none"> - Copy of the Environmental Authorisation - Flora Permit Reference Number - Copy of Fauna Permit (if applicable). 		

2. COMMENTS RECEIVED BY I&APS DURING IMPACT ASSESSMENT REPORT REVIEW PERIOD

No.	Comment	Raised By	Response
No comments have been received.			

3. GENERAL COMMENTS RECEIVED DURING IMPACT ASSESSMENT REPORT REVIEW PERIOD

No.	Comment	Raised By	Response
No comments have been received.			

4. COMMENTS RECEIVED DURING EIA ANNOUNCEMENT PHASE


No.	Comment	Raised By	Response
No comments were received during the Announcement Phase			

5. COMMENTS RECEIVED BY ORGANS OF STATE DURING SCOPING REPORT REVIEW PERIOD

No.	Comment	Raised By	Response
1.	<p>The application form and the draft Scoping Report (SR) dated October 2018 as received by this Department on 12 October 2018, refer.</p> <p>This Department has the following comments on the abovementioned application:</p> <p>Activities applied for</p>	<p>Thando Booie Case Officer DEA</p> <p>Letter: 02-11-2018</p>	<p>Comment noted, no response required.</p>
1.1.	<p>Please ensure that all relevant listed activities linked to the development activity or infrastructure as described in the project description, are applied for.</p>		<p>All relevant listed activities linked to the development activity or infrastructure as described in the project description have been applied for. Listed activities which have been applied for, and their applicability to the project is provided in Chapter 6, Table 6.1 of the Final Scoping</p>

No.	Comment	Raised By	Response
1.2.	If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms .		Report. Listed Activities applied for in the Application Form submitted to DEA do not differ from those included in the Final Scoping Report (refer to Chapter 6, Table 6.1 of the Final Scoping Report). An amended Application Form is therefore not required.
1.3.	<p>Description of identified Alternatives</p> <p>It has been noted that the location, design and layout as well as no-go alternatives have been included in the draft report, taking into consideration the advantages and disadvantages as why the site is believed to be the preferred. Therefore, should there be any other alternatives considered, you are required to include the information in the final SR.</p>		No other alternatives in addition to those identified in the Scoping Report released for public comment are being considered.
1.4.	<p>Public Participation Process</p> <p>Please ensure that all issues raised and comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final SR.</p>		Comments received from I&APs and organs of state during the 30-day public review period are included in Appendix C6 and Appendix C4 of the Final Scoping Report respectively, and have been incorporated into this Comments and Response Report attached as Appendix C8 to the Final Scoping Report. Where applicable, comments received have been utilised in the preparation and finalisation of the Scoping Report. Comment was requested from Mr. Stanley Tshitwamulomoni of the Biodiversity Conservation Section at the Department of Environmental Affairs (refer to Appendix C4 of the Final Scoping Report); however none have been received to date.
1.5.	Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.		Proof of correspondence with various stakeholders is attached in Appendix C4 (organs of state correspondence) and Appendix C5 (stakeholder correspondence) of the Final Scoping Report. Proof of attempts that were made to obtain comments is attached in Appendix C4 (organs of state correspondence) and Appendix C5 (stakeholder correspondence) of the Final Scoping Report.

No.	Comment	Raised By	Response
1.6.	The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.		The Public Participation Process is being conducted in accordance with Regulations 39, 40 41, 42, 43 and 44 of the 2014 EIA Regulations (GNR 326) as amended. An overview of the Public Participation Process is provided in Chapter 6, Section 6.4.2 of the Final Scoping Report.
General information			
1.7.	You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations, 2014 as amended.		The Final Scoping Report has been prepared in accordance with the requirements of Appendix 2 of the 2014 EIA Regulations (GNR 326). An overview of where the corresponding information required under Appendix 2 of the 2014 EIA Regulations (GNR 326) is contained within the Final Scoping Report is provided in Chapter 1, Table 1.2 of the Final Scoping Report.
1.8	Further note that in terms of Regulation 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of the these Regulations, unless an extension has been granted in terms of Regulation 3(7).		The applicant is cognisant of the need to comply with the requirements of Regulation 45 of the 2014 EIA Regulations (GNR 326) with regards to stipulated timeframes. In accordance with Regulation 21 of the 2014 EIA Regulations (GNR 326), an applicant must within 44 days of receipt of the application by the competent authority submit to the competent authority a Scoping Report which has been subjected to a public participation process of at least 30 days. The DEA confirmed having received the application form and Draft Scoping Report for Allepad PV Three on 12 October 2018. The Final Scoping Report is therefore required to be submitted by 26 November 2018.
1.9.	You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.		The applicant is cognisant of the need to comply with Section 24F of NEMA with regards to commencing with listed activities. No activities have or will commence on site prior to EA being granted by the DEA.
2.	Please find attached Eskom requirements for works at or near Eskom infrastructure. Please send me KMZ files of the affected properties. Please send me the DEA reference numbers as soon as they become available. Wayleave requirements and Renewable Energy Plant	John Geeringh Snr Consultant Environmental Management Group Capital Division: Land Development and	The documents submitted was acknowledged and forwarded to the Applicant. The requested KMZ files and the DEA reference number was e-mailed on 02 November 2018. Copies of the correspondences are included in Appendix C4 .

No.	Comment	Raised By	Response
	<u>Setback to Eskom Infrastructure documents included in Appendix C4.</u>	Management Eskom Holdings SOC Ltd E-mail: 02-11-2018	
3.	The above listed project bears reference. I would hereby wish to register as an I&AP for this particular project.	Nicole Abrahams Environmental Coordinator: Western Region	It is confirmed that Nicole Abrahams is registered as a Key Stakeholder on the project database.
3.1.	The South African National Roads Agency SOC Limited (SANRAL) has received background information and a site layout plan for this project and based on the proximity of the pipeline in relation to the National Road N10, it appears that SANRAL could be impacted by this development.	SANRAL Email: 06-11-2018	It was confirmed with regards to the reference made to a "pipeline" that the solid yellow line reflected on the locality map represents the 300m wide power line corridor (for environmental assessment purposes). The proposed power line corridor is located within the project property and runs parallel and adjacent to the road reserve and SANRAL's pipeline servitude.
3.2.	Could you also indicate the number appearing on the nearest blue km marker board on N10.		The number appearing on the nearest blue km marker board (i.e. 15.6N) located at 28° 24' 20.15" S and 21° 08' 09.10" E on the N10 has been obtained (refer to Figure 1), and forwarded to SANRAL. 

No.	Comment	Raised By	Response
			<p>Figure 1: Photo showing the nearest blue km marker board on the N10.</p>
3.3.	<p>If services need to be constructed over or under the national road, (in this case the N10) or within 60m measured from the road reserve fence, the service owner must apply for a written permission from SANRAL, before any work may be carried out. Attached please find an application form for the proposed encroachment.</p> <p>Do not hesitate to contact the sender should you have any further queries.</p>		<p>The applicant is cognisant of the need to apply for written permission from SANRAL, before any work may be carried out over or under the N10 national road, or within 60m measured from the road reserve fence, however no services need to be constructed over or under the N10 national road, or within 60m measured from the road reserve fence. The proposed power line corridor runs internal to the project property and is located adjacent to the road reserve and SANRAL's pipeline servitude.</p>
4.	<p>Savannah Environmental (Pty) Ltd has been appointed by ILEnergy Development (Pty) Ltd to conduct an Environmental Authorisation (EA) Application process for the proposed Allepad PV Three facility, near Upington, Northern Cape Province. A draft Scoping Report (DSR) has been completed in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations.</p> <p>The proposed development will include the construction of an array of PV panels with a generation capacity of up to 100 MW, mounting structures for the PV panels, electrical infrastructure, on-site substation, powerline, cabling, energy storage area, access roads, control building, offices, ablutions, guard house, temporary construction camp and laydown area.</p> <p>CTS Heritage had been appointed to provide heritage input into the EA Application process as per section 38(8)</p>	<p>Natasha Higgitt Heritage Officer SAHRA</p> <p>Letter: 08-11-2018</p>	<p>Comment noted, no response required.</p>

No.	Comment	Raised By	Response
	of the National Heritage Resources Act, Act 25 of 1999 (NHRA).		
4.1.	Lavin, J. 2018. Heritage Screener. Proposed development of Allepad PV Three, a solar PV Facility and associated infrastructure on a site near Upington, in the Northern Cape Province.		Comment noted, no response required.
4.2.	The Heritage Screener showed that the heritage resources in the proposed development area have not been sufficiently recorded, and that an archaeological field assessment be conducted to inform a full Heritage Impact Assessment (HIA). The Heritage Screener indicated that the development area is of low palaeontological sensitivity and therefore no further assessment of palaeontological resources is required.		Comment noted, no response required.
4.3.	<p>Interim Comment</p> <p>The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit notes the submitted Heritage Screener and awaits the pending HIA. SAHRA does not accept the recommendation of the Heritage Screener that no further assessment of palaeontological resources is required. The SAHRIS PalaeoSensitivity map shows that the development area is located within an area of moderate palaeontological sensitivity and therefore a desktop assessment of palaeontological resources is required. The assessment must comply with the 2012 SAHRA Minimum Standards: Palaeontological Components of Heritage Impact Assessments and must be compiled by a qualified palaeontologist. The 2012 Minimum Standards makes reference to a Letter of Recommendation for Exemption that may be submitted, should the palaeontologist deem is necessary.</p>		<p>The Heritage Specialist appointed to the project has indicated that a Letter of Recommendation for Exemption will be prepared and submitted by a palaeontologist in accordance with the 2012 SAHRA Minimum Standards: Palaeontological Components of Heritage Impact Assessments.</p>
4.4.	SAHRA awaits the pending HIA inclusive of an		A copy of the HIA will be uploaded to SAHRIS for SAHRA's review and

No.	Comment	Raised By	Response
	archaeological and palaeontological component, that takes into consideration the results of the Visual Impact Assessment and any heritage related comments during the public review periods, along with the Final Scoping report and the draft EIA with associated appendices when available for public review before further comments are issued.		comment as part of the 30-day public review period to be conducted as part of the EIA phase.
4.5.	Should you have any further queries, please contact the designated official using the case number quoted above in the case header.		Comment noted, no response required.
5.	<p>This letter is a response to the Draft Scoping Report for all four photovoltaic facilities and associated infrastructure on a site near Upington, in the Northern Cape Province submitted for environmental authorisation in terms of the National Environmental Management Act, 1998.</p> <p>SARAO(Formerly SKA SA) notes that the identified location for the project is approximately 210km away from the nearest SKA infrastructure. We, therefore, do not anticipate any negative impact on the SKA and have no objections on the Draft Scoping Report for all four Allepad PVs.</p>	<p>Selaelo Matlhane SARAO</p> <p>Letter: 07-11-2018</p>	The confirmation that the proposed Allepad PV projects would not have impact on the SKA SA infrastructure is noted.
6.	Please note that ATNS is aware of the above mentioned.	Simpfiwe Masilela	Comment noted, no response required.
6.1.	The area in which the proposed Allepad PV will be situated falls within the boundaries of the ICAO Annex 14 surfaces and Procedures of Air Navigation Services Operations associated with Upington Airport, therefore we cannot verify whether the proposed will affect the safety of flights, we would have to conduct a formal assessment once the project is ready for construction. You may be required to have a glint and glare impact assessment done as per SACAA requirement (refer to:	<p>Obstacle Evaluator</p> <p>ANTS</p> <p>Email: 08-11-2018</p>	If the need for a glint and glare impact assessment to be conducted in accordance with SACAA's requirements is confirmed, then one will be conducted accordingly.

No.	Comment	Raised By	Response
	Obstacle Notice 4/2017 (17/11/2017): Additional Requirements for Solar Project Applications)		
6.2.	Please update us should there be any new developments that may affect our interests.		ATNS is a registered stakeholder for the project, and will therefore be kept informed regarding the proposed project.
6.3.	For future projects please forward all queries to ObstacleEvaluators@ats.co.za		All future queries will be forwarded to ObstacleEvaluators@ats.co.za as per ATNS's request.
6.4.	For note for us to carry out a successful assessment we require the following information: 1. LOCATION (Co-ordinates WGS84 system) 2. SITE/GROUND ELEVATION (AMSL) 3. HEIGHT TO TOP OF PROPOSED DEVELOPMENT (in meters)		Information pertaining to the location, site / ground elevation and height to top of the proposed development will be provided to ATNS once it is available.
6.5.	Please also note that there is a fee attached to the Obstacle Evaluations for all formal applications following the EIA process.		The applicant is cognisant of the fee attached to the Obstacle Evaluations for all formal applications following the EIA process.

6. WRITTEN COMMENTS RECEIVED AFTER SCOPING REPORT REVIEW AND COMMENT PERIOD

1.	You may proceed with the EIA process in accordance with the tasks contemplated in the PoSEIA and the requirements of the EIA Regulations 2014, as amended. However, you must take note of the following comments from the Department:	Thando Booi Case Officer DEA Letter: 05-12-2018	
1.1.	<u>Technical Details of the proposed facility and design alternative</u>		
1.1.1.	The EIAR must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions. A sample for the minimum information required is listed under point 2 of the EIA information required for PV facilities below.		1.1.1 Table 2.2, Chapter 2 of the Environmental Impact Assessment (EIA) Report provides the technical details for the Allepad PV Three solar energy facility, including their description and/or dimensions.

1.1.2.	Further, the EIAR must include the design alternative for the proposed 100MW PV facility.		1.1.2 Chapter 3 of the EIA Report provides a description of the various alternatives considered for Allepad PV Three. The design alternative proposed for Allepad PV Three is considered to be the most reasonable and feasible alternative for the development considering technical and environmental constraints, and therefore no design alternatives were identified or assessed.
1.2.	<p><u>Application for re-zoning</u></p> <p>The EIAR must include proof indicating that an application for the re-zoning has been lodged with the relevant authority as the proposed development will take place on land currently zoned for agricultural land uses.</p>		<p>An application for rezoning has been submitted to the Dawid Kruijper Local Municipality. The municipality informed the applicant that an application can only be processed once the project has received EA. Proof of correspondence with the municipality has been included in Appendix L of the EIA Report. A rezoning application will be undertaken as a separate process by the developer once the project has been selected as a preferred bidder project in the Department of Energy's Renewable Energy Independent Power Producer Procurement (REIPPP) Programme.</p>
1.3. 1.3.1.	<p><u>The EIAR must also provide the following:</u></p> <p>Provide a clear indication of the proposed development footprint of the PV solar facility as well as the all associated infrastructure; i.e. placement of photovoltaic (PV) panels.</p>		<p>The project footprint has been included in Chapter 2, Section 2.1.1 of the EIA Report and consist of footprint of the facility and all associated infrastructure.</p>
1.3.2.	<p>Clear description of all associated infrastructure. This description must include, but not limited to the following:</p> <ul style="list-style-type: none"> • Power lines; • Internal roads infrastructure; • All supporting onsite infrastructure such as laydown area, guard house and control room etc. • All necessary details regarding all possible locations and sizes of the proposed satellite substation and the main substation. 		<p>The Allepad PV Three and all associated infrastructure has been described in Chapter 2 of the EIA Report.</p> <p>Information on services required on the site, e.g. sewage, refuse removal, water and electricity, agreements with suppliers and confirmation of capacity been requested from the municipality but not confirmation has been received to date. Proof of the requests have been included in Appendix L2 of the EIA Report.</p>

	<ul style="list-style-type: none"> Information on services required on the site, e.g. sewage, refuse removal, water and electricity, agreements with suppliers and confirmation of capacity been obtained must be provided. 		
<p>1.4. 1.4.1.</p>	<p><u>Need and Desirability of the proposed development</u> The Department has noted that there are other projects of similar nature in the area, therefore; your EIAR must provide detailed description of the need and desirability taking into account cumulative impacts of the proposed development in the area.</p>		<p>The need and desirability of the project has been described in detail in Chapter 5 of the EIA Report which considers other projects operating and under construction in the area. Chapter 9 of the EIA Report assesses the potential for cumulative impacts associated with the project and other projects in the area.</p>
<p>1.5. 1.5.1.</p>	<p><u>A copy of the final site layout map and alternatives.</u> All available biodiversity information must be used in the finalisation of the layout map. The layout map must indicate the following:</p> <ul style="list-style-type: none"> PV positions and its numbering as well as the associated infrastructure; Permanent laydown area footprint; Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible); Wetlands, drainage lines, rivers, stream and water crossing of roads and cables indicating the type of bridging structures that will be used; The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure; Substation(s) and/or transformer(s) sites including their entire footprint; Connection lutes (including pylon positions) to the distribution/transmission network; 		<p>A copy of the final site layout map which indicates the information requested by DEA in its Acceptance of Scoping is provided in Appendix M of the EIA Report.</p>

	<ul style="list-style-type: none"> • All existing infrastructure on the site, especially roads; • Buffer areas; • Buildings, including accommodation; and • All "no-go" areas. 		
1.6.	<p><u>Topographical and sensitive Maps</u></p>		
1.6.1.	<p>An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process must be on an A3 page and must have a clear legend.</p>		<p>An A3 environmental sensitivity map is provided in Appendix M of the EIA Report.</p>
1.6.2.	<p>A topographical map combining the final layout map superimposed (overlain) on the environmental sensitivity map must be submitted with the final EIAR.</p>		<p>A layout map overlain by environmental sensitivities identified within the project site and 300m power line corridor is provided in Appendix M to the EIA Report.</p>
1.7.	<p><u>Shapefile of the preferred Development layout</u></p> <p>A shapefile of the preferred development layout/footprint must be submitted to this Department. The shapefile must be created using the Hartebeesthoek 94 Datum and the data should be in Decimal Degree Format using the WGS 84 Spheroid. The shapefile must include at a minimum the following extensions i.e. .shp; .shx; .dbf; .prj; and, .xml (Metadata file). If specific symbology was assigned to the file, then the .avl and/or the .lyr file must also be included. Data must be mapped at a scale of 1:10 000 (please specify if an alternative scale was used). The metadata must include a description of the base data used for digitizing. The shapefile must be submitted in a zip file using the EIA application reference number as the title.</p> <p>The shape file must be submitted to:</p> <p>Postal Address: Department of Environmental Affairs Private Bag X447, Pretoria 0001</p> <p>Physical address: Environment House, 73 Steve Biko Road, Pretoria</p>		<p>Shapefiles of the preferred development layout / footprint will be submitted to the DEA with a copy of the final EIA Report.</p>

	<p>For Attention: Muhammad Essop Integrated Environmental Authorisations Strategic Infrastructure Developments Telephone Number: (012) 399 9406 Email Address: MEssoot6environment.aov.za</p>		
1.8.	<p><u>The Environmental Management Programme (EMPr)</u> The EMPr to be submitted as part of the EIAR must include the following:</p>		
1.8.1.	<p>All recommendations and mitigation measures recorded in the EIAR and the specialist studies conducted.</p>		<p>The Environmental Management Programme (EMPr) prepared for the project is attached as Appendix I to the EIA Report, copies of which have been submitted to DEA for its review and comment. The EMPr contains all recommendations and mitigation measures recorded in the EIA Report and the specialist studies conducted (refer to Appendix D to Appendix H of the EIA Report).</p>
1.8.2.	<p>A good quality final site layout map with clear legend.</p>		<p>A copy of the final site layout map is included in Appendix A of the EMPr prepared for the project and attached as Appendix I to the EIA Report</p>
1.8.3.	<p>Measures as dictated by the final site layout map and micro-siting.</p>		<p>Measures as dictated by the final site layout map are included in the EMPr, prepared for the project and attached as Appendix I to this EIA Report.</p>
1.8.4.	<p>An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process.</p>		<p>A copy of the environmental sensitivity map of the project site and 300m power line corridor is included in Appendix A of the EMPr prepared for the project and attached as Appendix I to the EIA Report.</p>
1.8.5.	<p>A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.</p>		<p>A map which superimposes the layout of Allepad PV Three over the environmental sensitivity map is included in Appendix A of the EMPr prepared for the project and</p>

			attached as Appendix I to the EIA Report.
1.8.6.	An alien invasive management plan to be implemented during construction and operation of the facility. The plan must include mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal of alien species is undertaken.		An alien invasive management plan has been prepared for the project, and is included in Appendix C of the EMPr prepared for the project, and attached as Appendix I to the EIA Report.
1.8.7.	A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a vegetation specialist familiar with the site and be implemented prior to commencement of the construction phase.		A plant rescue and protection plan has been prepared by a vegetation specialist familiar with the site and is included in Appendix D of the EMPr prepared for the project, and attached as Appendix I to the EIA Report.
1.8.8.	A re-vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility. Restoration must be undertaken as soon as possible after completion of construction activities to reduce the amount of habitat converted at any time and to speed up the recovery to natural habitats.		A re-vegetation and habitat rehabilitation plan has been prepared for the project, and is included in Appendix E of the EMPr prepared for the project, and attached as Appendix I to the EIA Report.
1.8.9.	A traffic management plan for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimize impacts on local commuters e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time and avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations.		A traffic management plan has been prepared for the project, and is included in Appendix I of the EMPr prepared for the project, and attached as Appendix I to the EIA Report.
1.8.10.	A storm water management plan to be implemented during the construction and operation of the facility. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated stormwater or increased soil erosion. The plan must include the construction of appropriate design measures that allow surface and		A storm water management plan has been prepared for the project, and is included in Appendix G of the EMPr, prepared for the project and attached as Appendix I to the EIA Report. The plan includes appropriate design measures that allow surface and subsurface movement of water along drainage lines.

	subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off.		
1.8.11.	A fire management plan to be implemented during the construction and operation of the facility.		A fire management plan has been prepared for the project, and is included in Appendix J of the EMPr, prepared for the project and attached as Appendix I to the EIA Report.
1.8.12.	Measures to protect archaeological sites, artefacts, paleontological fossils or graves from construction and operational impacts		Measures to protect archaeological sites, artefacts, paleontological fossils or graves have been identified and are included in Objective 16 of the EMPr.
1.8.13.	The EAP must provide detailed motivation if any of the above requirements is not required by the proposed development and not included in the EMPr.		Where there are deviation from DEA's requirements stipulated in the Acceptance of Scoping, a motivation has been provided with the EIA Report for Allepad PV Three.
1.8.14.	You are hereby reminded that should the EIAr fail to comply with the requirements of this acceptance letter, the proposed 100MW Allepad Three PV Facility project will be refused in terms of the EIA Regulations 2014, as amended.		Savannah Environmental is cognisant of the requirements stipulated in the Acceptance of Scoping and have addressed these in the EIA Report (as detailed within Table 6.3).
1.9.	<u>Public Participation</u>		
1.9.1.	Ensure that all relevant stakeholders' comments (including original comments) are submitted to the Department with the final EIAr. This includes but is not limited to the Department of Environmental Affairs: Biodiversity and Conservation Directorate, the Department of Agriculture, Forestry and Fisheries (DAFF), Department of Environment and Nature Conservation, the South African Civil Aviation Authority (SACAA), the Department of Transport, The David Kruiper Local Municipality, Department of Water and Sanitation (DWS), the South African National Roads Agency Limited (SANRAL), the South African Heritage Resources Agency (SAHRA), the Endangered Wildlife Trust (EWT), Department of Mineral Resources, National Energy Regulator of South Africa(NERSA), National Department of Energy,		It can be confirmed that the organs of state as listed by the DEA and key stakeholders identified as relevant to the project. Proof of correspondence to and from these stakeholders are included in Appendix C5 and Appendix C6 in the draft EIAr.

1.9.2.	<p>Eskom, Cape Nature and Birdlife South Africa.</p> <p>Proof of all correspondence must be included in the EIAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.</p>		<p>All comments received to date have been included within this Comments and Responses Report. Where comments haven't been obtained, proof that attempts were made to obtain comments have been included in Appendix C4 (organs of state correspondence) and Appendix C5 (stakeholder correspondence). A distribution list for the EIA Report has been drafted and will be updated with the waybill numbers and the proof of follow-up for written comments. This document will be included in Appendix C5 in the final EIA Report.</p> <p>The database with the registered I&APs are included as Appendix C1 in the EIA Report.</p>
1.9.3.	<p>The applicant is hereby reminded to comply with the requirements of Regulation 45 with regard to the time period allowed for complying with the requirements of the Regulations, and Regulations 43 and 44 with regard to the allowance of a comment period for interested and affected parties on all reports submitted to the competent authority for decision-making. The reports referred to are listed in Regulation 43(1).</p>		<p>Savannah Environmental is cognisant of the need to comply with Regulations 43, 44 and 45 of the 2014 EIA Regulations (GNR 326).</p> <p>» Regulation 43 (GNR 326): This EIA Report has been made available for a 30-day public review period from 28 February 2019 to 01 April 2019. The EIA Report has been distributed to relevant Organs of State and a copy has been made available at the Dawid Kruijer Public Library, corner of Mark and Mutual Streets, Upington. The EIA Report which has been submitted to the national DEA, the Northern Cape DENC, and relevant Organs of State is also available for download from www.savannahsa.com or on CD on request from Savannah Environmental (Pty) Ltd.</p> <p>» Regulation 44 (GNR 326): Comments from I&APs received to date are included in the Comments and Response (C&R) Report attached as</p>

			<p>Appendix C8 to this EIA Report.</p> <p>» Regulation 45 (GNR 326): Acceptance of Scoping was received from DEA on 05 December 2018. In accordance with Regulation 23(1)(a) (GNR 326) the applicant must within 106 days of the acceptance of the Scoping Report submit to the authority an EIA Report inclusive of any specialist reports, and an EMPr, which must have been subjected to a public participation process of at least 30-days and which includes the incorporation of comments received, including any comments of the competent authority. The EIA Report has been released for a 30-day public review period from 28 February 2019 to 01 April 2019. Comments received during this 30-day public review period will be incorporated into the C&R Report to be attached as Appendix C8 to the Final EIA Report. The Final EIA Report inclusive of specialist studies and an EMPr is due to be submitted by 13 April 2019¹.</p>
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¹ This date has been calculated excluding the period of 15 December to 05 January in accordance with the requirements of Regulation 3(2) of the 2014 EIA Regulations (GNR 326).

	<p>Furthermore, it must be reiterated that, should an application for Environmental Authorisation be subject to the provisions of Chapter II, Section 38 of the National Heritage Resources Act, Act 25 of 1999, then this Department will not be able to make nor issue a decision in terms of your application for Environmental Authorisation pending a letter from the pertinent heritage authority categorically stating that the application fulfils the requirements of the relevant heritage resources authority as described in Chapter II, Section 38(8) of the National Heritage Resources Act, Act 25 of 1999. Comments from SAHRA and/or the provincial department of heritage must be provided in the EIAr.</p>		<p>Savannah Environmental acknowledges that should the application be subject to Section 38 of the National Heritage Resources Act, Act 25 of 1999, the Department will require a letter from the pertinent heritage authority categorically stating that the application fulfils the requirements of the relevant heritage resources authority. Comments from SAHRA and/or the provincial department of heritage have been requested and will be included in the final EIA Report.</p> <p>Communication with the Provincial Heritage Resources Agent: Northern Cape Province is included in Appendix C4 and the EIA Report has been uploaded on SAHRIS, the official website for all EA Applications and Heritage Reports. The Provincial Authority has also been provided with an electronic copy of the EIA Report and proof of the delivery is included in Appendix C4.</p>
2.	<p>The Directorate: Biodiversity Conservation reviewed and evaluated the above-mentioned report including its specialist's studies and it's satisfied with the information provided. The following recommendations must be considered during the final scoping phase:</p>	<p>Stanley Tshitwamulomoni Acting Director: Biodiversity Conservation DEA</p>	
2.1.	<p>A detailed Terrestrial Ecological Impact Assessment Report must be compiled and submitted for review;</p>	<p>Letter: 16-11-2018</p>	<p>A detailed Ecology Impact Assessment including fauna and flora has been compiled for the Allepad PV Three project and has been included in the EIA Report for public review as Appendix D.</p>
2.2.	<p>A Wetland Delineation must be undertaken in order to properly determine the boundaries of channels and riparian areas on site; and</p>		<p>The development footprint for Allepad PV Three avoids all drainage systems and small washes located within the project site. The Ecologist has drafted a motivation letter as to why a wetland delineation is not required for this project and has been included as Appendix L3 of the EIA Report for public review.</p>

2.3.	A detailed Avifaunal Impact Assessment Report must be compiled and submitted for review.		A detailed Avifauna Impact Assessment has been compiled for the Allepad PV Three project, including associated infrastructure and is included as Appendix E of the EIA Report for public review.
2.4.	The overall biodiversity objective is to minimize loss to biodiversity as possible. In order to achieve this objective the above mentioned recommendations must be adhered to.		The need for the minimisation of loss to biodiversity is acknowledged. The recommendations made by DEA: Biodiversity Conservation in order to achieve the objective of minimised loss is noted and has been considered and addressed in the EIA Report where necessary as per the responses included under points 2.1 – 2.4 above.