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10 October 2019

Director: Integrated Environmental Authorisations
Department of Environmental Affairs
Environment House
473 Steve Biko Road, Arcadia
Private Bag X447
Pretoria
0001

Attention: Sizwe Mnkomo

Dear Mr Mnkomo,

**PROPOSED VELD PV NORTH SOLAR ENERGY FACILITY AND ASSOCIATED
INFRASTRUCTURE, ON THE REMAINDER OF FARM 53 HARAMOEP, NEAR AGGENEYS IN THE
NORTHERN CAPE**

Submission of the Final Basic Assessment Report – DEA Ref: 14/12/16/3/3/1/2051

Our application, draft Basic Assessment Report dated September 2019 and your comments thereon dated 30 September 2019 refer.

1. Aurecon South Africa (Pty) Ltd (Aurecon) has been appointed by Veld PV North (Pty) Ltd (Veld) as the independent environmental practitioner (EAP) to undertake a Basic Assessment Process (BAR) as required by the by the Environmental Impact Assessment Regulations, 2014 (EIA Regulations, as amended) pursuant to the National Environmental Management Act (Act of 107 of 1998) (NEMA) for the above project.
2. The project comprises a 75 MW Photovoltaic (PV) solar energy facility on the farm Haramoep (Remainder of Farm 53) in the Namakwa District Municipality approximately 20 km north-west of Aggeneys in the Northern Cape.
3. Please note that Veld has also submitted an Application Form for a second solar facility, known as Veld PV South (DEA Ref: 14/12/16/3/3/1/2052) on a separate site on the same farm.
4. Please find herewith the Final Basic Assessment Report (1x hard copy) and USB including all the annexures.
5. A completed and original Application Form for the proposed Veld PV North Solar Energy Facility is attached as Annexure F to Basic Assessment Report as submitted to your offices on 11 July 2019. Please note that an amended Application Form is attached to this cover letter as **Annexure 1** (see point 8 below) to update details regarding the project description that have changed since the first submission, the properties affected and the listed activities.
6. Note that a Scoping and EIA process was initiated for this project in 2016 but was stopped due to funders withdrawing. No application was submitted at the time, but a pre-application meeting was held with DEA.
7. The process has now changed to a Basic Assessment due to the site being within the Springbok REDZ.
8. We respond to your comments contained in the aforementioned letter from DEA dated 30 September 2019 as follows:

Activities applied for

- The application form has been amended and is attached as **Annexure 1** to this letter.

Specialist Studies

- Declaration forms of the specialists are attached as **Annexure 2** to this letter.
- Improved clear, readable maps that show the sensitivity of the site are attached under **Annexure 3** to this letter. To this end the maps are attached as:

Annexure 3A: Specialist Buffers

Annexure 3B: CBAs and ESAs

Annexure 3C: NFEPA Wetlands, Rivers and Aquatic Features

Annexure 3D: NPAES and IBA

Annexure 3E: Vegetation Type

- The Storm Water Impact Assessment study has been reviewed by an independent external specialist that meets the requirements of Regulation 13(1)(a) and (b) of NEMA EIA Regulations as amended. The Reviewers report is attached to this cover letter as **Annexure 4**. The reviewer did not make any findings that were contrary to the main findings of the original report, however he has made some recommendations to improve the quality of the report. A revision of this report will be submitted under cover of a separate letter due to challenges with coordination of submissions prior to the submission deadline, as discussed telephonically with Mr Thando Boo of DEA.
- As indicated on page 133 of the Basic Assessment Report landscape degradation impacts are expected to be high and remain unmitigated. This is due to the site where the PV project is proposed is currently strongly associated with a natural / wilderness sense of place that has high levels of scenic quality. It should be noted that while this is the case, there are very few receptors to experience this impact and no parties have raised it as a concern. The development will be of a semi-industrial nature and while the impact will have a long duration, it is reversable at the decommissioning of the project. Further, the project is located in an area identified as suitable for this type of development in that it falls into the Springbok REDZ and thus this change to the landscape has been deemed acceptable.
- In order to mitigate visual impacts, no PVs will be more than 5m above the ground.

Maps

- Layout plans of at a scale of 1:10 000 are included in **Annexure 5** of this cover letter.
- Sensitivity maps overlaid by the development footprint at a scale of 1:50 000 are included in **Annexure 3**, as indicated above.

Public Participation Process

- Proof of the PPP can be found in Annexure C of the Final BAR, including adverts, comments from all stakeholders, responses, and correspondence indicating the attempts made to elicit comment. The Public Participation Process was conducted in terms of Regulations 39, 40 41, 42 43 & 44 of the EIA Regulations 2014, as amended.

Site visit

- Note that the layout plan has been amended to avoid the area where the dunes are located. Layout plans are included in **Annexure 5**, as mentioned above.

General Comments

- The Final BAR complies with the requirements of Appendix 1 and Regulation 19(1)(a) and 19(3) of the EIA Regulations, 2014 as amended.
- The Final BAR is due to be submitted on or before 11 October 2019.
- The applicant has been informed that no activity may commence prior to the Environmental Authorisation being granted.

9. Please do not hesitate to contact us should you have any queries - we await your further response.

Yours sincerely

AURECON

A handwritten signature in black ink, appearing to read 'C Norman'.

Charles Norman

Manager: Environment and Planning