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26 February 2020

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

Attention: Thando Boo!

Dear Mr Boo!

**PROPOSED VELD PV SOUTH 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: 14/12/16/3/3/1/2103

Our application, draft Basic Assessment Report dated 29 November 2019 and your Department's comments thereon dated 17 January 2020 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 North (DEA Ref: 14/12/16/3/3/1/2102) 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 Application Form for the proposed Veld PV North Solar Energy Facility as received by your Department on 12 November 2019 is attached as Annexure F to the Final Basic Assessment Report. 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 listed activities that have been corrected to be in line with the Final Basic Assessment Report and includes original signed declarations by the applicant and EAP.
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. The process has now changed to a Basic Assessment due to the site being within the Springbok REDZ.
7. Since then an application for a Basic Assessment process was submitted but was withdrawn on 24 October 2019. During that process, now regarded as the pre-application phase for this application, a site inspection was undertaken on 19 September 2019.

8. We respond to your comments contained in the aforementioned letter from DEA dated 17 January 2020 as follows:

Activities applied for

- Our understanding, as discussed during the site inspection with DEA on 19 September 2010, is that both Activity 15 of LN 2 and Activity 12 of LN 3 are applicable to this application.
 - The motivation for Activity 15 of LN 2 is that the physical alteration of undeveloped land for industrial use would take place with the total area to be transformed being approximately 277 ha.
 - The motivation for Activity 12 of LN 3 is that more than 300m² of indigenous vegetation will be cleared within an area designated as a Critical Biodiversity Area (CBA2) in the Northern Cape, albeit that the Botanical Specialist has indicated that the vegetation is not representative of CBA2.
- Activity 24 of LN 1 has been removed from the Final Basic Assessment Report as the proposed roads associated with this development do not trigger this activity.
- The amended application form that has been corrected to include Activity 15 of LN2 is attached to this letter as **Annexure 1**. The annexures for the application form can be found in the Final Basic Assessment Report with the original application form under Annexure F.

Specialist Studies

- Declaration forms of the specialists are attached as **Annexure G** to the Final Basic Assessment Report.
- 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 reviewer did not make any findings that were contrary to the main findings of the original report, however he did make some recommendations to improve the quality of the report, which was subsequently updated. The Reviewer's report is attached as **Annexure D9.1** and his subsequent comment on the update of the original report is included as **Annexure D9.1.1** of the Final Basic Assessment Report. The updated original report that addresses the reviewer's comments has been included as **Annexure D9.2** of the Final Basic Assessment Report.
- As indicated on page 126 of the Final Basic Assessment Report landscape degradation impacts are expected to be high. This is due to the site where the PV project is proposed being currently strongly associated with a natural / wilderness sense of place that has high levels of scenic quality. It must be noted that while this is the case, there are very few receptors to experience this impact, which will be mitigated by restricting the PV panels to less than 5m high and reducing light spillage at night by limiting the intensity and direction of lights, as well as the use of motion activators as included in Section 4.8.1 of the EMPr. The development will be of a semi-industrial nature and while the impact will have a long duration, it is reversible 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.

Public Participation Process

- Proof of the PPP can be found in Annexure C of the Final Basic Assessment Report, 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.

- An extensive effort was launched to conduct the PPP for Veld PV North and Veld PV South which entailed the following:
- During the **pre-application phase** the following tasks were conducted:
 - Advertisements in English and Afrikaans were placed in a local newspaper, Die Plattelander, notifying the broader public of the initiation of the BA process and inviting them to register as I&APs and inform them of the availability of the draft Basic Assessment Report (BAR) at Aggeneys Library.
 - A hard copy of the Draft BAR was placed in the Aggeneys Library for 30 days.
 - Site notices: posters in English and Afrikaans were erected at the entrance of the proposed site.
 - Written notification: Letters and emails were issued to all relevant authorities and the landowner informing them of the proposed project, including a notification of the availability of the draft BAR for comment. Each letter included a CD. Identified I&APs were notified of this comment period via letters delivered by post and email.
 - Hard copies of the draft reports as well as USBs were delivered to DEA as well as Biodiversity (DEA).
 - Refer to Table 2 of Annexure C1 for the comments and response report (CRR).
 - Northern Cape Department of Environmental Conservation, Khai-Ma Local Municipality as well as Namakwa District Municipality were part of the extensive I&AP list and all the comments that were obtained from them are available in the CRR (Table 2).
 - In reference to comments obtained from Biodiversity (DEA) please refer to Annexure C1.9.13.1, C1.9.13.2 and C1.10.1 in the CRR.
- During the **application phase** the following tasks were conducted:
 - Advertisements in English and Afrikaans were placed in a local newspaper, Die Plattelander, notifying the broader public of the initiation of the BA process, inviting them to register as I&APs and inform them of the availability of the draft Basic Assessment Report (BAR) at Aggeneys Library.
 - A hard copy of the Draft BAR was placed in the Aggeneys Library for 30 days.
 - Site notices: posters in English and Afrikaans were erected at the entrance of the proposed site.
 - Written notification: Letters and emails were issued to all authorities and the landowner informing them of the proposed project including a notification of the availability of the draft BAR for comment. Each letter included a CD. Identified I&APs were notified of this comment period via letters delivered by post and email.
 - Hard copies of the draft reports as well as USBs were delivered to DEA as well as to Biodiversity (DEA).
 - Northern Cape Department of Environmental Conservation, Khai-Ma Local Municipality as well as Namakwa District Municipality were part of the extensive I&AP list and all the comments that were obtained from them are available in the CRR (Table 3).

- In reference to comments obtained Biodiversity (DEA) please refer to Annexure C1.15.1 and C.15.2. in the CRR.
- In reference to comments obtained from Northern Cape Department Environment and Nature Conservation (DENC) please refer to Annexure C1.15.3 and C.15.4. in the CRR.

General Comments

- The Final Basic Assessment Report complies with the requirements of Appendix 1 and Regulation 19(1)(a) and 19(3) of the EIA Regulations, 2014 as amended.
- The Final Basic Assessment Report is due to be submitted on or before 3 March 2020.
- The applicant has been informed that no activity may commence prior to an 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



Charles Norman

Manager: Environment and Planning