#### BUSHMANLAND PV (PTY) LTD

# THE PROPOSED BUSHMANLAND PV PROJECT, NEAR UPINGTON IN THE NORTHERN CAPE PROVINCE

# LANDSCAPE & VISUAL IMPACT ASSESSMENT

#### **MARCH 2020**

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#### 1 INTRODUCTION

#### 1.1 GENERAL

Bushmanland PV (Pty) Ltd is proposing the development of a solar photovoltaic (PV) facility, near the town of Upington in the Northern Cape.

In terms of the National Environmental Management Act (NEMA) Act No. 107 of 1998, as amended, the proposed development requires environmental authorisation. Cape EAPrac (Pty) Ltd has been appointed by Bushmanland PV (Pty) as the independent environmental assessment practitioner to undertake the necessary Basic Assessment (BA).

One on the significant potential environmental issues identified during the planning phase of the BA was the landscape and visual impact that the facility will have on surrounding areas. This Landscape and Visual Impact (LVIA) Report will therefore provide specialist visual input into the BA Process.

#### 1.2 PROJECT LOCATION

The proposed Solar Photovoltaic (PV) Facility will be located on the following property:

Geel Kop, Remaining Extent of Farm No 456.

The site is located approximately 24km southwest of Upingtonwithin the Ka! Garib Local Municipality and the ZF Mgcawu District Municipality in the Northern Cape Province.

#### (Map 1: Site Location).

No site alternatives are under consideration.

#### 1.3 BACKGROUND OF SPECIALIST

Jon Marshall qualified as a Landscape Architect in 1978. He also has extensive experience of Environmental Impact Assessment. Jonhas been involved in Visual Impact Assessment over a period of approximately 30 years. He has developed the necessary computer skills to prepare viewshed analysis and three dimensional modelling to illustrate impact assessments. He has undertaken visual impact assessments for tourism development, major buildings, mining projects, industrial development, infrastructure and renewable energy projects. He has been involved in the preparation of visual guidelines for large scale developments.

A brief Curriculum Vitae outlining relevant projects as well as a declaration of Independence is included as **Appendix I.** 

#### 1.4 BRIEF AND RELEVANT GUIDELINES

The brief is to assess the possible impact of the proposed project on surrounding landscape character as well as the potential visual impact on sensitive receptors.

LVIA work will be undertaken in accordance with the following guideline documents:

a. The Government of the Western Cape Guideline for Involving Visual and Aesthetic Specialists in EIA Processes (Western Cape Guideline), which is the

- only local relevant guideline, setting various levels of assessment subject to the nature of the proposed development and surrounding landscape<sup>1</sup>; and
- b. The Landscape Institute and Institute of Environmental Management and Assessment (UK) Guidelines for Landscape and Visual Impact Assessment which provides detail of international best practice (UK Guidelines).

Refer to **Appendix II** for the Western Cape Guideline.

Together these documents provide a basis for the level and approach of a LVIA as well as the necessary tools for assessment and making an assessment legible to stakeholders.

#### 1.5 LIMITATIONS AND ASSUMPTIONS

The following limitations and assumptions should be noted:

In the assessment tables, the subjective judgement as to whether an impact is negative or positive is based on the assumption that the most people are likely to prefer views of a natural or rural landscape rather than an industrial landscape.

A site visit was undertaken over a two day period (27<sup>th</sup>– 28<sup>th</sup>February 2020) to verify the likely visibility of the proposed development, the nature of the affected landscape and affected receptors.

The site visit was planned to ensure that weather conditions were clear providing maximum visibility.

The timing of photography was planned to ensure that the sun was as far as possible behind the photographer to ensure that as much detail as possible was recorded in the photographs.

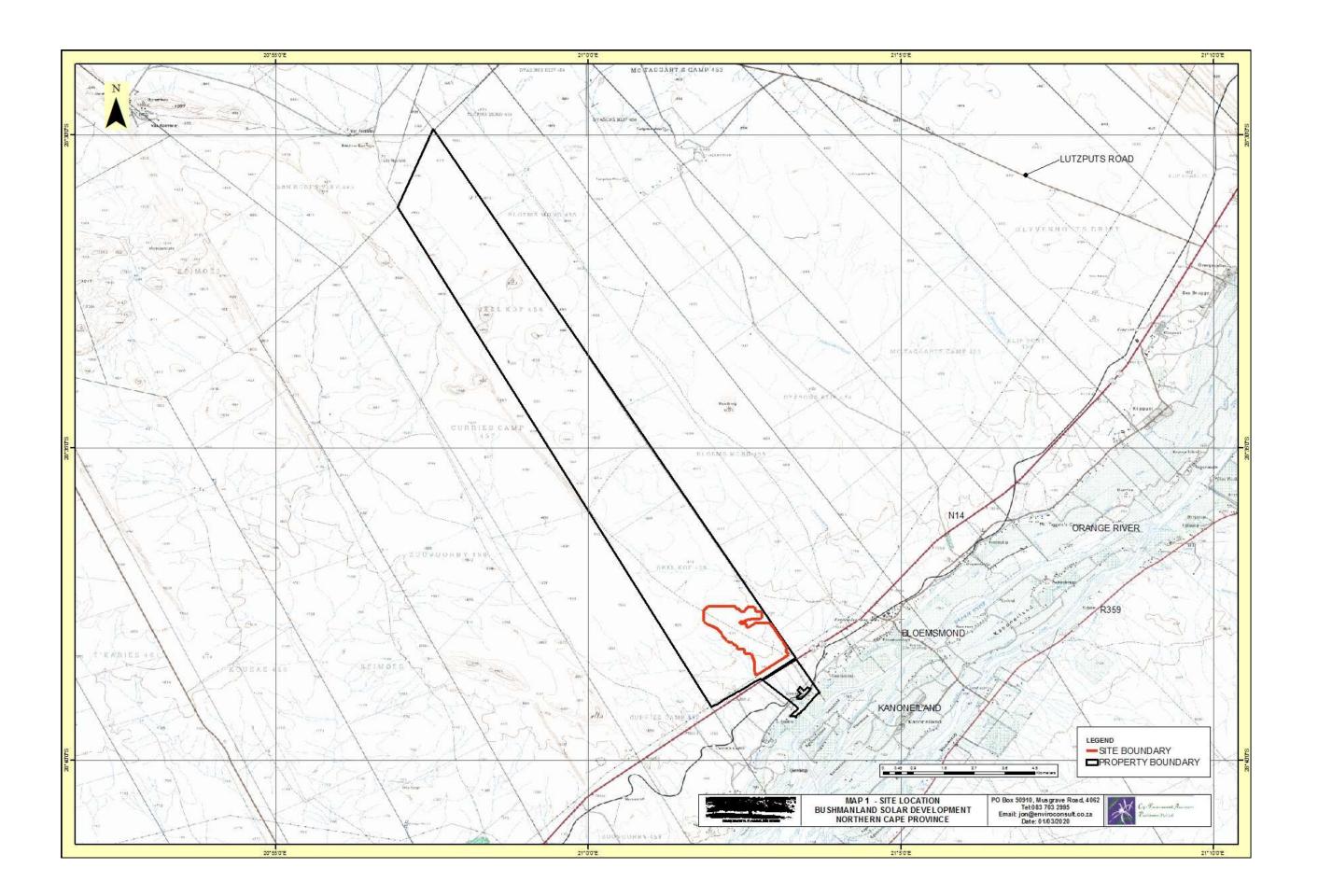
The approximate extent of the development visible from each viewpoint, as indicated in Section 5.2, has been approximated by measuring on plan the angle of the view that the development occupies given that each view was taken with a 28mm lens which has an approximate angle of vision of just over 74°. This has been cross referenced with known land marks.

Visibility of the proposed elements has been assessed using Arcview Spatial Aanalyst. The visibility assessment is based on terrain data that has been derived from satellite imagery. This data was originally prepared by NASA and is freely available on the CIAT-CCAFS website (http://www.cgiar-csi.org). This data has been ground truthed using a GPS as well as online mapping.

Calculation of visibility is based purely on the Digital Elevation Model and does not take into account the screening potential of vegetation.

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<sup>&</sup>lt;sup>1</sup> The Western Cape Guidelines are used as neither the National nor the Northern Cape Departments have guidelines in place



#### 2. PROJECT DESCRIPTION

#### 2.1 MOTIVATION AND PROJECT CONTEXT

Refer to Map 2, Project Context

In response to the Department of Energy's requirement for renewable energy generation projects, the applicant is proposing the establishment of a PV solar energy generation facility with a generating capacity of up to 100MW.

Considering the impact that carbon emissions, from existing coal-fired power stations, have on the environment, PV solar energy generation facilities are designed to operate with low maintenance and no ongoing carbon emissions for more than 20 years.

The project is proposed to be part of the Department of Energy's (DoE) Renewable Energy Independent Power Producer Programme (REIPPPP).

The area within which the project is proposed has been identified as a key area for renewable energy generation by the Department of Environmental Affairs (DEA) in their strategic assessment which identifies seven Renewable Energy Development Zones (REDZ). The area in which this project is located is the Upington REDZ 7.

The objective of this strategic assessment is to focus renewable energy projects within the most suitable areas. This also has the benefit of ensuring that less suitable areas are likely to be relatively undeveloped.

Currently within a 30km radius of the proposed Bushmanland PV study area, there are fourteen other properties on which renewable energy projects are proposed. These consist of both Concentrated Solar Projects (CSP) as well as Solar Photovoltaic projects (PV).

There is one existing CSP project approximately 10km to the north east of the project site (Khi Solar 1).

There are also ten proposed and authorised PV projects on McTaggarts Farm 453, Klip Punt Farm 452 and Tungsten Lodge Farm RE/638 which are located directly to the northwest and south-east of Khi Solar 1 as well as two constructed and two authorised projects on the Farm Dysonsklip which is located to the north of the subject property and south of Khi Solar 1.

At the time of reporting one project (Sirius PV 1) was commissioned on Tungsten Lodge Farm RE/638 and two projects (Dysonsklip PV 1 and 2) were commissioned on the Farm Dysonsklip.

The number of renewable energy projects in the vicinity of the proposed project has resulted in the development of strategic high voltage electrical infrastructure, including the Upington MTS, as well as power line connections to individual renewable energy projects.

#### 2.2 DESCRIPTION

Refer to Map 3, Site Layout

A development area with an extent of  $\sim$ 220ha has been identified by Bushmanland PV (Pty) Ltd as a technically suitable site for a solar PV facility with a contracted capacity of up to 100MW.

The study area is comprised of the entire area over which the proposed development may be visible. For all intents and purposes this is defined by the Approximate Limit of Visibility (ALV)

The development area is comprised of development site that is enclosed by the security fence plus the road access.

The entire study area and the development area are located within the Upington REDZ. Due to the location of the study area and development area within a REDZ, a Basic Assessment (BA) process will be undertaken in accordance with GN R114 as formally gazetted on 16 February 2018.

The Bushmanland PV project will include the following infrastructure:

- » Fixed-tilt or single axis / dual axis tracking solar PV panels with a maximum height of 3.5m;
- » Centralised inverter stations or string inverters;
- » A temporary laydown area of ± 3-5 ha;
- » Cabling between the panels, to be laid underground where practical;
- » A 22kV or 33kV/132kV on-site substation (within a substation complex) of up to 5 000m² in extent to facilitate the connection between the solar PV facility and the electricity grid. The project intends to connect from the onsite sub-stations to the Upington MTS (400/132 kV), via the 132kV Geelkop Collector Substation (this basic assessment (BA) process only includes the IPP portion of the onsite sub-station, while the remainder of the grid connection is being assessed in a separate BA process);
- » A site access road to the development area with a maximum width of 8m;
- » Internal access roads within the PV panel array;
- » Operation and Maintenance buildings including a gate house and security building, control centre, offices, storage and a workshop; and
- » Electrified perimeter fence and security infrastructure.

The power generated from Bushmanland PV will be sold to Eskom and will feed into the national electricity grid. Ultimately, it is intended for Bushmanland PV to form part of the South Africa's renewable energy portfolio, as contemplated in the Integrated Resource Plan (IRP).

A separate basic assessment process will be undertaken for the grid connection infrastructure to connect Bushmanland PV to the Upington Main Transmission Substation (MTS).

It is possible that the facility could either be developed as static, fixed mounted PV system or tracking PV systems.

Tracking systems can utilise single axis or dual access trackers. A 'single axis tracker' will track the sun from east to west, while a dual axis tracker will in addition be equipped to account for the seasonal waning of the sun. These systems utilise moving parts and

complex technology, including solar irradiation sensors to optimise the exposure of PV panels to sunlight.

#### 2.3 MAIN PROJECT COMPONENTS

A solar energy facility typically uses the following primary components:

#### 2.3.1 Photovoltaic Panels

Solar photovoltaic (PV) panels consist primarily of glass and various semiconductor materials and in a typical solar PV project, will be arranged in rows to form solar arrays. The PV panels are designed to operate continuously for more than 20 years with minimal maintenance required. It is envisaged that the plant will operate after this design lifetime.

#### 2.3.2 Support Structure

The photovoltaic (PV) modules will be mounted to steel support structures. As indicated above, these can either be mounted at a fixed tilt angle, optimised to receive the maximum amount of solar radiation and dependent on the latitude of the proposed facility, or a tracking mechanism with a maximum tilt angle of 60°.

#### 2.3.3 Inverters

The photovoltaic effect produces electricity in direct current (DC). Inverters must be used to change DC to alternating current (AC) for transmission in the national grid. The PV combining switchgear (PVCS), which is dispersed among the arrays, collects the power from the arrays for transmission to the project's substation.

The inverters generally have a height lower than or similar to the surrounding PV panels.

#### 2.3.4 Transformer and On-Site Substation

The inverters feed AC current to the onsite substation which steps it up for transmission of the power to the national grid. The main infrastructure within the substation is comprised of transformers that will stand approximately 10m high.

The project is intend to connect from the onsite sub-station to the Upington MTS (400/132 kV), via the 132kV Geelkop Collector Substation (this BAonly includes the IPP portion of the onsite sub-station, while the remainder of the grid connection is being assessed in a separate BA process).

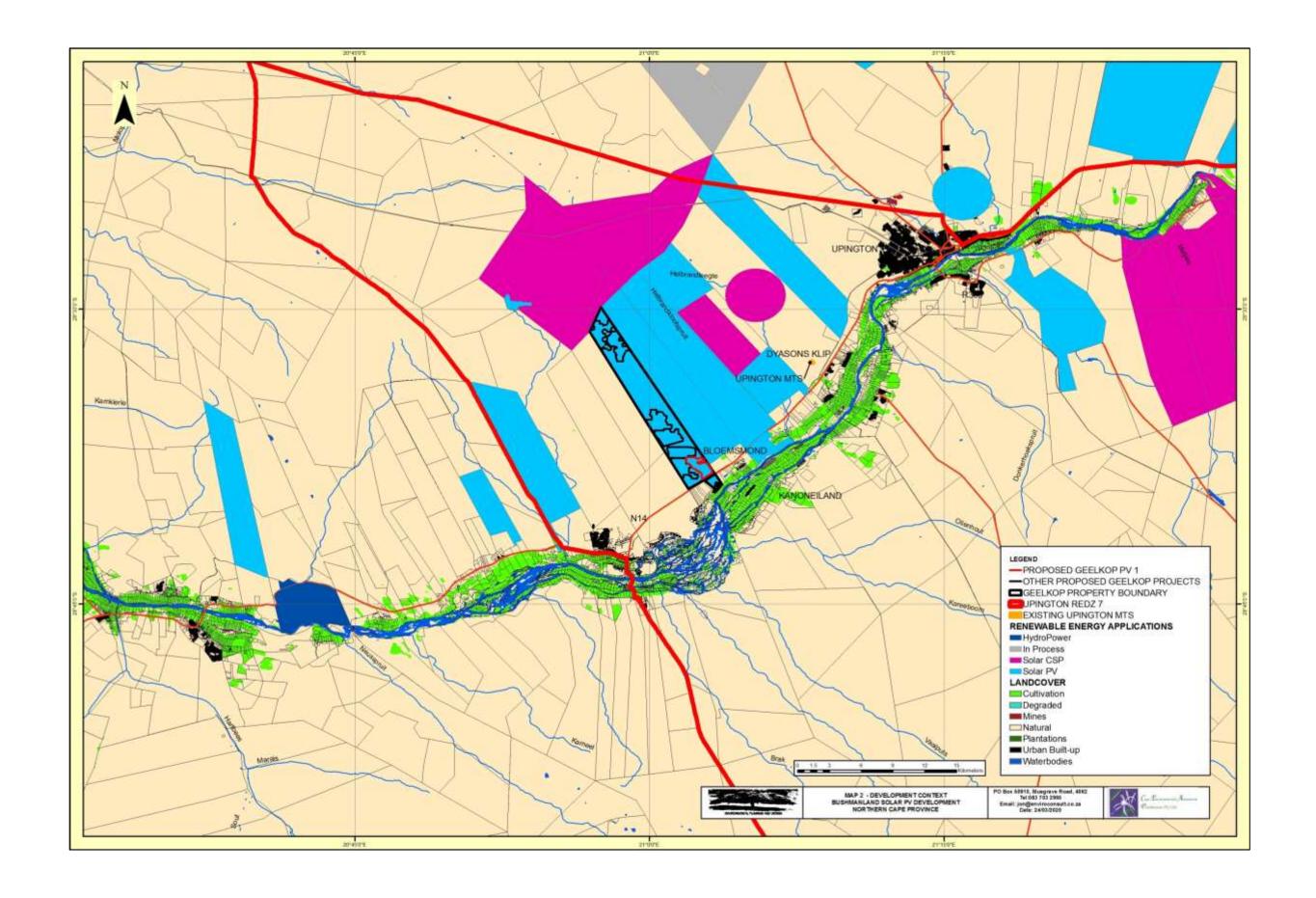
#### 2.3.5 Site Access Road

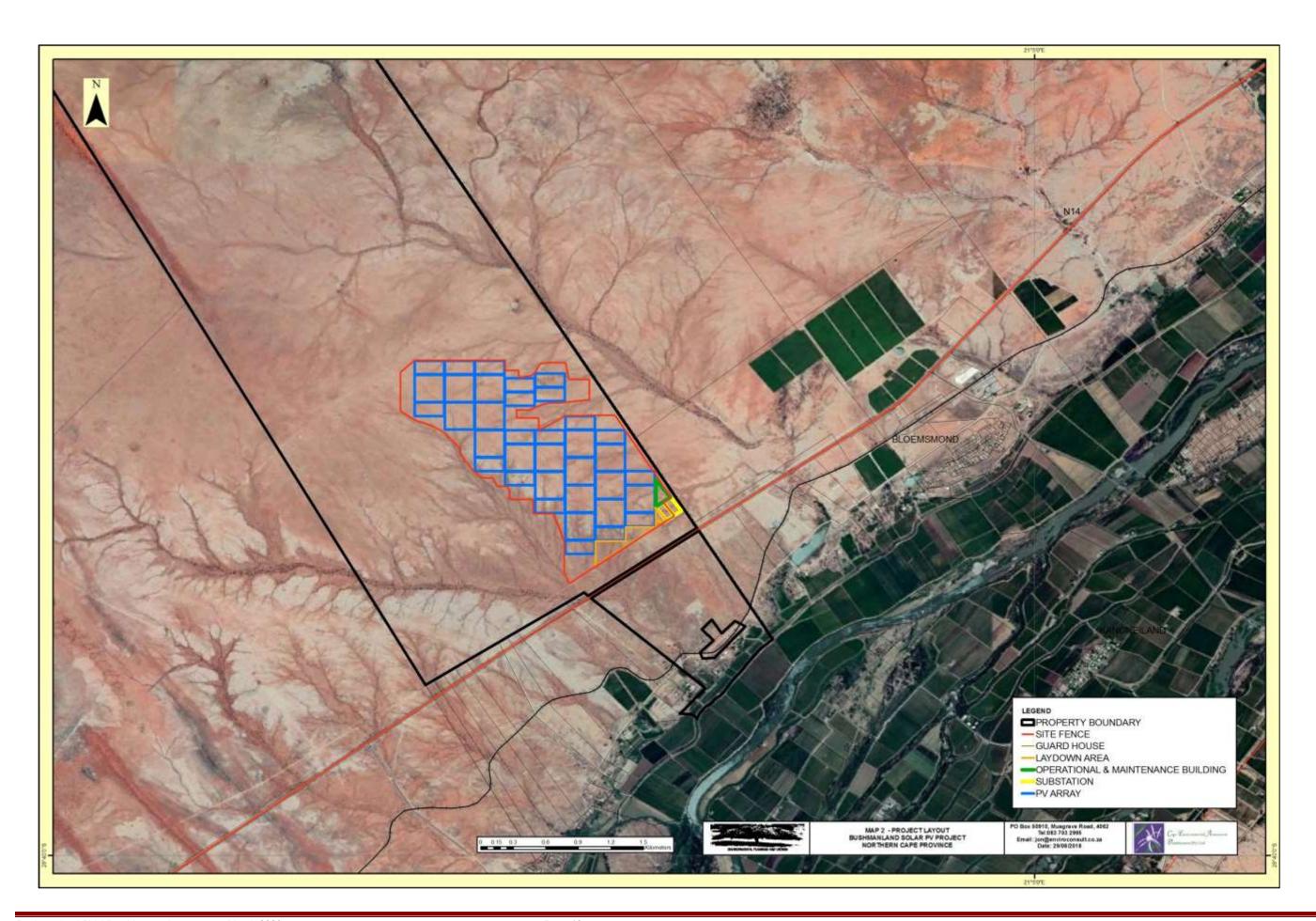
The proposed site access point utilises the existing farm access point on the N14.The proposed road alignment follows an existing track and extends approximately 220m from the site access point to the south east corner of the proposed development site.

A second access road is proposed branching proposed Bushmanland access at a point approximately 50m from the N14. This road is aligned along the eastern boundary of the proposed Bushmanland PV development site in order to provide access to additional proposed PV projects within the property.



Plate 1, Existing Upington Main Transmission Substation viewed from the Lutzputs Road.





## 3 DESCRIPTION OF RECEIVING ENVIRONMENT AND RECEPTORS

#### 3.1 LANDSCAPE CHARACTER

Landscape character is defined as "a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another".

Landscape Character is a composite of influencing factors including;

- Landform and drainage
- Nature and density of development
- Vegetation patterns

#### 3.1.1 Landform and Drainage

The topography of the region is relatively homogenous and is described pre-dominantly as lowlands with hills and dune hills to the north. Relatively prominent small hills occur towards the west and south-west of the study area.

The area surrounding the proposed development is generally comprised of fairly flatlying terrain between inselbergs or isolated steep rocky outcrops. The inselbergs in the vicinity of the site are concentrated to the north and north-west of the site where they form the upper valley slopes and ridgelines.

The land slopes gradually towards the Orange River Valley which is a major regional drainage feature.

There are four minor non-perennial watercourses, that drain the site towards the north, east and south into two more major non-perennial channels. These larger non-perennial water courses drain directly into the Orange River to the south of the site.

Whilst the region surrounding the site is relatively flat, a degree of relief is provided by minor ridgelines that formed by an historic dune field that runs in a general northwest to southeast direction at regular intervals. From the air, these minor ridgelines appear as a series of waves in the arid landscape. These ridgelines rise between three and five metres above the valley floor. Whilst they are minor they are likely to have a visual influence in that they will provide somevisual screening for relatively low structures.

The non-perennial water courses that flow into the Orange River at intervals fall from the undulating plain into the Orange River Valley, due to the slightly steeper gradient as they fall towards the Orange River, they have created larger and slightly deeper valleys than can be found on flatter areas of the plain. This is particularly obvious when driving along the N14 which is located on the edge of the river valley. This section of road passes through valleys that are approximately 15m deep from floor to the crest of the ridgelines. These valley lines are likely to have significant influence over the visibility of the project from the road.

Refer to Map 4, Landform& Drainage.



Plate 2, View from the N14 to the southeast of the development site looking along the road.

The gently undulating nature of the landform on the edge of the Orange River Valley is clear from the road profile. When in one of the valleys, visibility over the surrounding landscape is restricted.



Plate 3, View from close to the N14 looking down into the Orange River Valley. The shallow valley sides slope gently down to the river.

#### 3.1.2 Landcover

The Orange River has, to a large degree, dictated the settlement pattern in this arid region by providing a source of perennial water for the cultivation of grapes and cotton. This and the associated production of wine and dried fruit (raisins and sultanas) are the primary agricultural activity of this district.

The majority ofcultivation and settlement in the region occurs around the Orange River.

Upington is a major regional centre that lies approximately 24km to the northeast of the development site. Due to distance and the relatively flat terrain, the proposed project will not have any visual impact on this area.

In the vicinity of the proposed project there are extensive vineyards within the Orange River Valley.

Settlement in the form of small townships and groups of farm buildings are located on the edges of the river valley and within the cultivated areas. This cultivation and settlement generally extends to the N14 which runs along the upper edge of the River Valley. Because the majority of settlement is within the River Valley and at a lower level than the development site, it is likely that the proposed development will be largely screened, particularly from settlement located on the northern side of the Orange River.

Other than areas located around the Orange River, settlement in the region is sparse.

From the site visit only one tourism landuse was obvious. This was the Bezalel Wine Farm (Plate 4), the entrance to which is located on the N14 approximately 7.3kmto the north east of the property on which the project isproposed. The farm itself including accommodation, restaurant and wine tasting area is located within the valley. Views of the proposed project will not be possible from this operation.

As can be seen from **Map 2 (Project Context)**, there are a significant number of solar power projects planned for the region in the vicinity of the proposed project. These include:

- Khunab (McTaggarts PV 1, 2 and 3 and Klip Punt PV 1) Solar PV Projects
- Sirius Solar PV Projects 1, 2, 3 and 4 are located on a property immediately to the south of the subject property. These projects have been authorised and one had been commissioned at the time of reporting;
- Two constructed and two authorised projects on the Farm Dysonsklip which is located to the north of the subject property; and
- Khi Solar One which is a Concentrated Solar Power project (solar tower technology) that has been developed to the north-east. This project provides a major landmark that is visible for a significant distance.

Refer to Map 5, Landcover.



Plate 4, View of the Bezalel Wine Farm within the Orange River Valley. Because of its location within the River Valley, this tourism operation is unlikely to have a view of the proposed solar project.



**Plate 5, View of Khi Solar One from the Lutzputs Road to the north east.** Other planned and under construction solar power projects will change the landscape surrounding the proposed project site.



Plate 6, View of commissioned Sirius Solar PV project (centre picture) from the Lutzputs Road.

#### 3.1.3 Vegetation Patterns

The following vegetation types are evident within the study area;

- a) Natural vegetation that is generally associated with the rural landscape; and
- b) Vegetation within the Orange River Valley that is generally associated with agricultural operations.

These vegetation types are indicated on **Map 6**, **Vegetation Types**.

#### a) Natural Vegetation

Mucina and Rutherford<sup>2</sup>indicate that the natural vegetation of the area includes:

- Bushmanland Arid Grassland;
- Kalahari Karroid Shrubland; and
- Gordonia Dunveld.

Mucina and Rutherford's description of Bushmanland Arid Grassland includes;

Extensive to irregular plains on a slightly sloping plateau sparsely vegetated by grassland dominated by white grasses (Stipagrostisspecies) giving this vegetation type the character of semidesert 'steppe'. In places low shrubs of Salsolachange the vegetation structure. In years of abundant rainfall rich displays of annual herbs can be expected.

<sup>&</sup>lt;sup>2</sup> The Vegetation of South Africa, Lesotho and Swaziland

Mucina and Rutherford's description of Kalahari Karroid Shrublandincludes;

Low karroid shrubland on flat, gravel plains. Karoo-related elements (shrubs) meet here with northern floristic elements, indicating a transition to the Kalahari region and sandy soils.

Mucina and Rutherford's description of Gordonia Dunveld includes;

Parallel dunes about 3–8 m above the plains. Open shrubland with ridges of grasslanddominated by Stipagrostisamabilison the dune crests and Acacia haematoxylonon the dune slopes, also with A. mellifera on lower slopes and Rhigozumtrichotomumin the interdune straaten.

Whilst botanically these vegetation types may be very different, in visual terms the most important characteristics include:

- They are key components of the natural, semi-desert, landscape of the region;
- The description of Gordonia Duneveld picks up on the regular, wave like, dunes that are a dominant feature of the landscape surrounding Upington; and
- All the descriptions highlight the fact that vegetation in the area is low and provides little screening potential for development.

#### b) Vegetation within the Orange River Valley

Vegetation within this area is comprised of a matrix of:

- Crop vegetation that is largely comprised of grapes for wine making and fruit;
- Patches of low natural vegetation particularly on the upper valley slopes;
- Ornamental vegetation including large trees around homesteads and small settlements; and
- Patches of largely alien vegetation particularly on the edges of cultivation.

This vegetation provides a significant degree of screening from within the Orange River Valley.

#### 3.2 LANDSCAPE CHARACTER AREAS

#### 3.2.1 Landscape Character Area and Visual Absorption Capacity

Landscape Character Areas (LCAs) are defined as "single unique areas which are the discrete geographical areas of a particular landscape type"<sup>3</sup>.

Visual Absorption Capacity (VAC) is *defined* as the landscape's ability to absorb physical changes without transformation in its visual character and quality. Where elements that contrast with existing landscape character are proposed, VAC is dependent on elements such as landform, vegetation and other development to provide screening of a new element. The scale and texture of a landscape is also critical in providing VAC, for example; a new large scale industrial development located within a rural small scale field pattern is likely to be all the more obvious due to its scale.

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<sup>&</sup>lt;sup>3</sup> UK Guidelines.

The affected landscape can generally be divided into the following LCAs that are largely defined by vegetation and drainage patterns.

- Orange River Valley. The gently undulating landform is punctuated by inselberg that often form a chain aligned in a general north to south direction. This area is generally natural in character with very little settlement. It is obvious from Map 2 (Project Context) that the natural character of this area is in transition in that solar projects are likely to create an industrial aesthetic within a matrix of natural vegetation. VAC within this area is provided by the inselbergs and on alimited basis by the regular, low, dune formation as well as slopes of the slightly larger minor valleys that are associated with the non-perennial water courses that flow into the Orange River Valley.
- The Orange River Corridor LCA which is comprised of the shallow valley area surrounding the Orange River. This area is generally inward looking drawing little character influence from the surrounding plateau. Landform, vegetation and development all play a role in screening views of surrounding areas and contribute to significant VAC.

These LCAs are indicated on Map 7, Landscape Character Areas.

#### 3.3 VISUAL RECEPTORS

Visual Receptors are defined as "individuals and / or defined groups of people who have the potential to be affected by the proposal"<sup>4</sup>.

#### 3.3.1 Identified visual receptors

It is possible that an area might be sensitive due to an existing use. The nature of an outlook is generally more critical to areas that are associated with recreation, tourism and in areas where outlook is critical to land values.

This section highlights possible Receptors within the landscape which due to use could be sensitive to landscape change. They include:

- Area Receptors which include the minor urban settlement areas that are located within the Orange River Corridor LCA. From the site visit it appears that the majority of settlement areas relate to agricultural use of the River Valley. It is likely that the residents of these minor settlements are predominantly focused on agricultural production of the area. As these settlements are located within the River Valley LCA, it is also likely that views of the proposed development particularly from the northern side of the valley will be difficult. However, vegetation within the River Valley will help screen views of the proposed development that may be possible from the valley;
- Linear Receptors or routes through the area that include the N14, the R359, the Lutzputsroad and the Upington to Kakamas Spur Railway Line. Both the N14 and the R359 roads have tourism significance, although the N14 is possibly the most

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<sup>&</sup>lt;sup>4</sup> UK Guidelines

- important in this regard. The Lutzputs road is an unsurfaced road that runs approximately 15.3km to the north east of the development area, this road is likely to be mainly used by local people. The Upington to Kakamas Spur Railway Line was developed to transport goods and so is not considered further;
- Point Receptors that include individual homesteads that are located both within the River Valley LCA and the Plateau LCA. From the site visit, it is unlikely that individual homesteads on the northern side of the Orange River will have views over the proposed development. It is however possible that homesteads on the higher sections on the southern side of the valley could have views of the proposed development. These however will be distance views and they are likely to be softened by vegetation on the fringes of the River Valley.

Visual receptors that include places and routes that may be sensitive to landscape change are indicated on **Map7.** 

#### LANDSCAPE CHARACTER AREAS



Plate 7, Plateau LCA



Plate 8, River Corridor LCA

#### **SENSITIVE RECEIVERS**



Plate 9, View from the R359 across the River Valley LCA.



Plate 10, Settlement and homesteads within the River Valley LCA



**Plate 11, The N14.** This is a major regional route that runs close to the southern edge of the proposed development and is important for tourism.



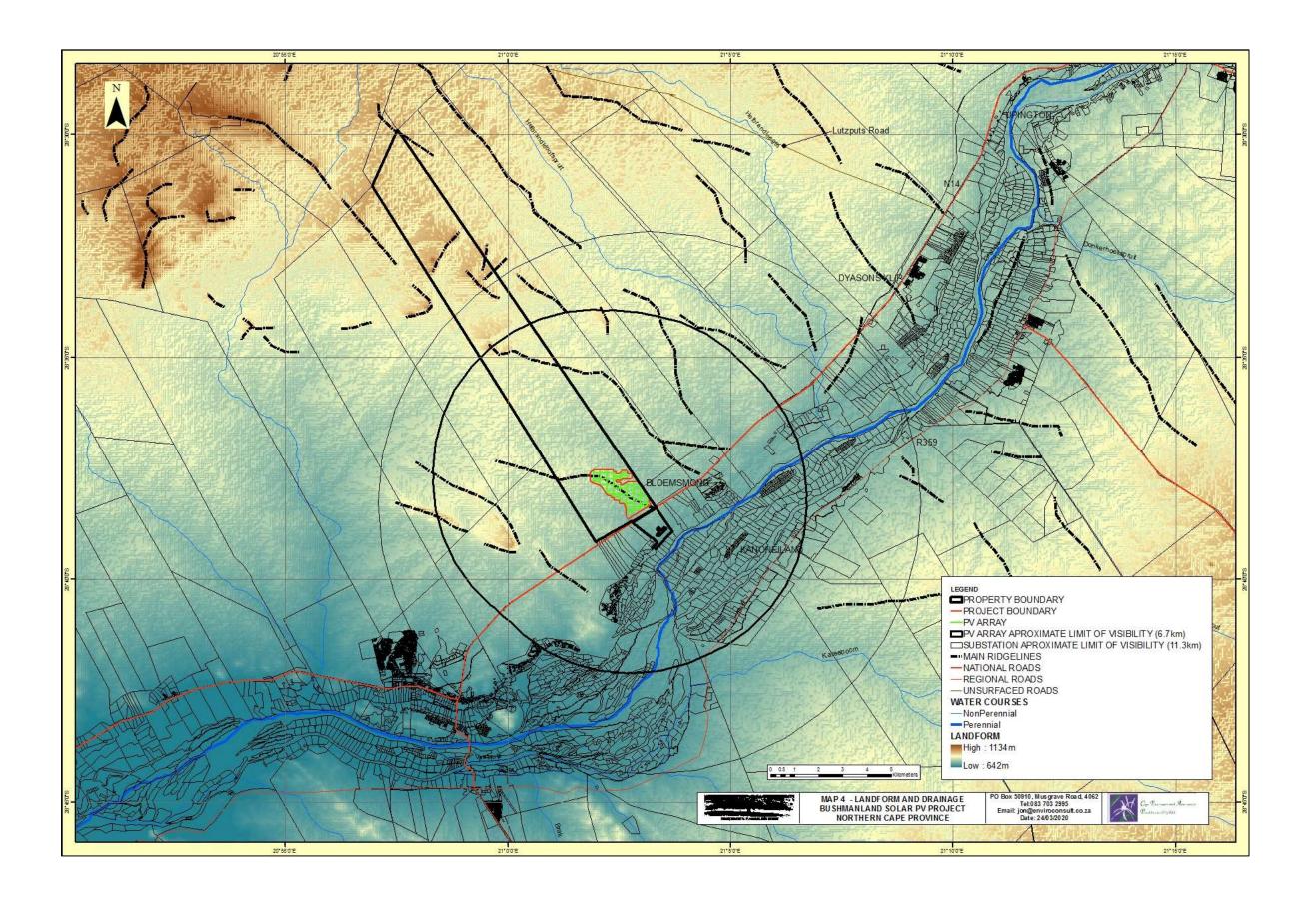
Plate 12, Homesteads within the Plateau

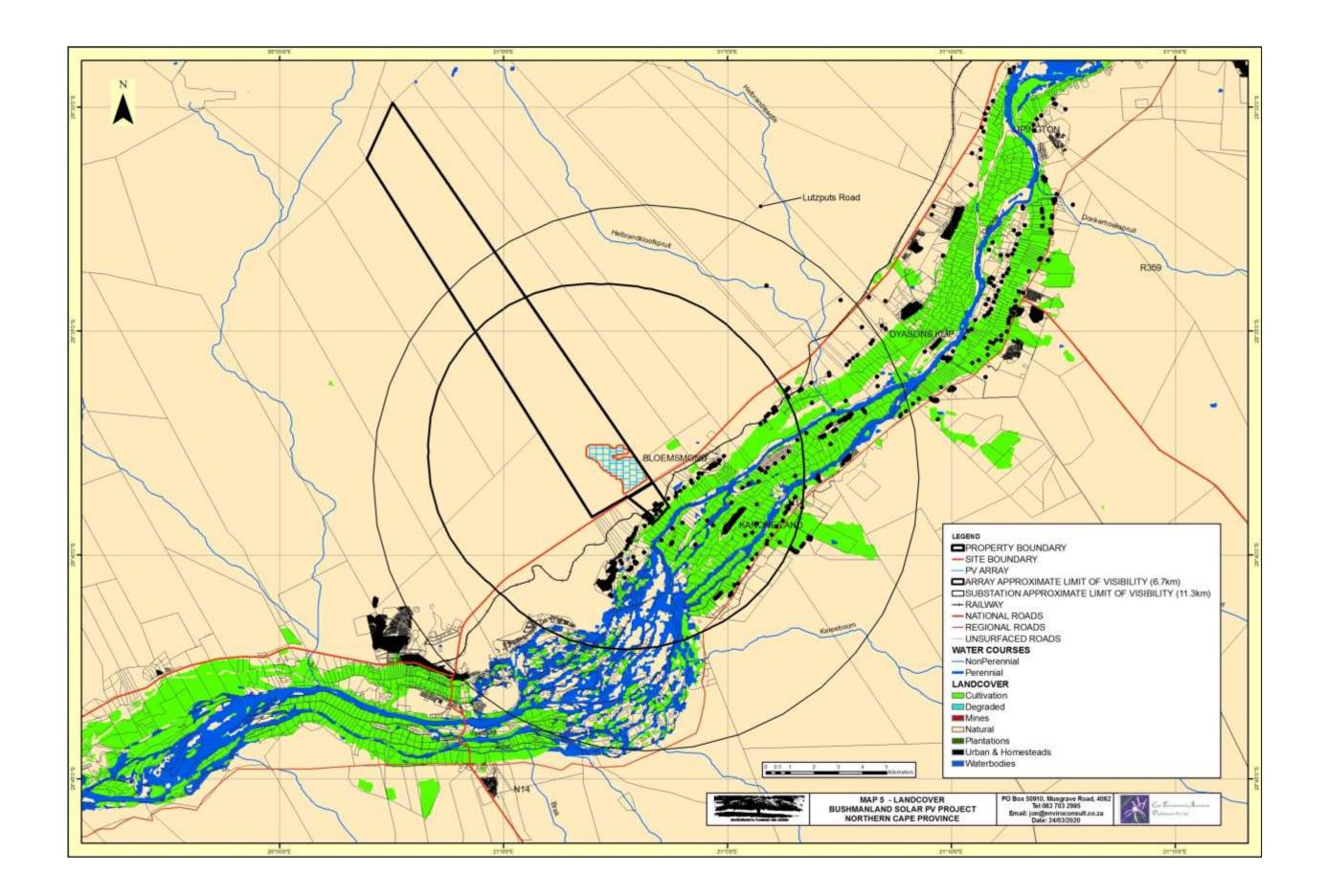


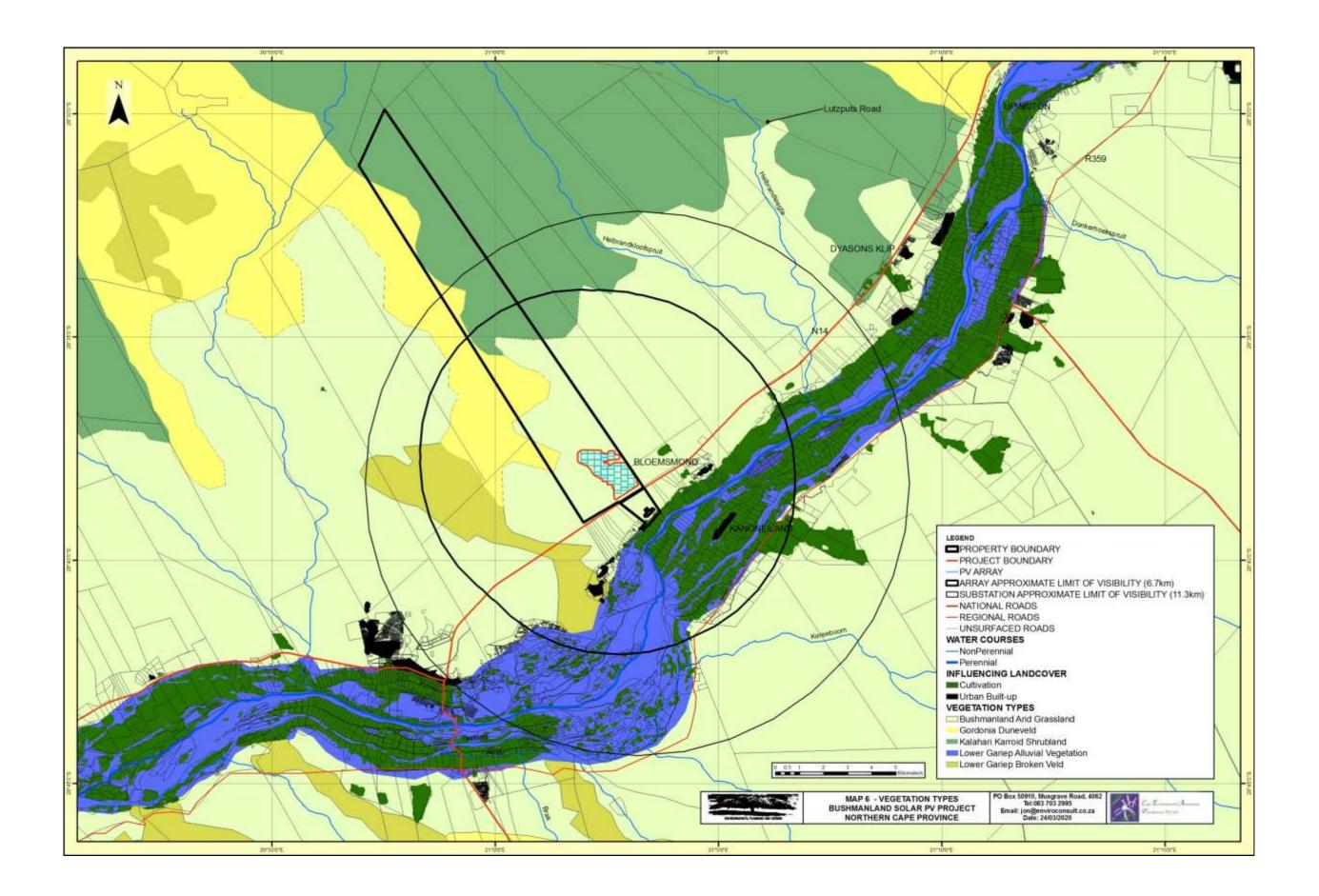
Plate 13, The Lutzputs Road. This is an unsurfaced local road that runs to the north and east of the proposed project. It is likely to be transport of fruit and goods from Kakamas. largely used by local people.

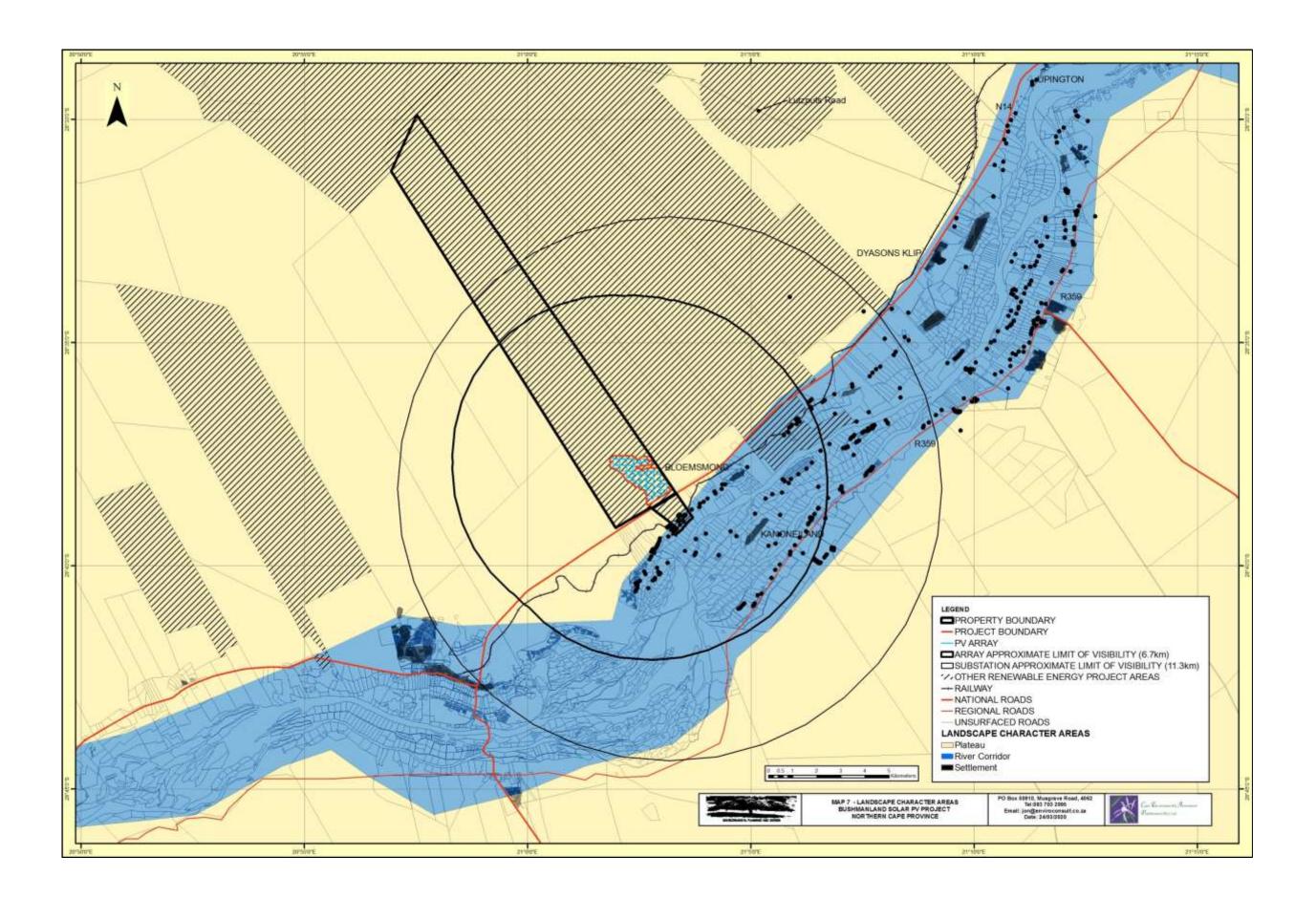


Plate 14, The Upington to Kakamas Branch Line. This line is used for the









#### **4 THE GENERAL NATURE OF POTENTIAL VISUAL IMPACTS**

#### 4.1 GENERAL

Impacts could include general degradation of the relatively natural landscape in which the development is proposed as well as change of view for affected people and / or activities;

- a. Generally landscape change or degradation. This is particularly important for protected areas where the landscape character might be deemed to be exceptional or rare. However it can also be important in non-protected areas particularly where landscape character is critical to a specific broad scale use such as tourism areas or for general enjoyment of an area. This is generally assessed by the breaking down of a landscape into components that make up the overall character and understanding how proposed elements may change the balance of the various elements that are visible. The height, mass, form and colour of new elements all help to make new elements more or less obvious as does the structure of an existing landscape which can provide screening ability or texture that helps to assimilate new elements.
- b. Change in specific views for specific receptors for which the character of a view may be important for a specific use or enjoyment of the area.
  - Visual intrusion is a change in a view of a landscape that reduces the quality of the view. This can be a highly subjective judgement. Subjectivity has however been removed as far as is possible by classifying the landscape character of each area and providing a description of the change in the landscape that will occur due to the proposed development. The subjective part of the assessment is to define whether the impact is negative or positive. Again to make the assessment as objective as possible, the judgement is based on the level of dependency of the use in question on existing landscape characteristics.
  - Visual obstruction is the blocking of views or foreshortening of views. This can generally be measured in terms of extent.

Due to the nature of the proposed development, visual impacts for receptors are expected to relate largely to intrusion. However, this is likely to be limited as the existing Khi 1 CSP facility has already largely altered views in the vicinity of the proposed facility.

#### 4.2 THE NATURE OF LIKELY VIEWS OF THE DEVELOPMENT

#### 4.2.1 Timing of Impacts

During the construction phase, it is expected that traffic will be slightly higher than normal as trucks will be required to transport materials and equipment such as PV panels and frames to the site.

Site preparation will generally include the following activities:

• vegetation clearance will be comprised of brush cutting only, no complete clearance will be undertaken;

- levelling and grading of areas where the array will be sited would normally occur, the assessment indicates that the land is relatively flat so only minor grading will be required under exceptional circumstances;
- levelling of hard-standing areas, e.g. for temporary laydown and storage areas, as indicated above only minor grading is likely to be necessary;
- erection of site fencing; and
- construction of a temporary construction camp which will occur within a laydown area within the overall site.

These activities are only likely to be visible from the immediate vicinity of the site.

As the site is developed, concrete bases will be constructed (if required), the support structures will then be assembled and PV panels attached, ancillary structures and minor buildings will also be constructed.

The development will therefore appear on a progressive basis in the landscape, however once the concrete bases are constructed, the structures are likely to be assembled rapidly.

The construction phase is programmed to take approximately 12-18 months.

By the end of the construction process, the array will be assembled, minor buildings constructed and the full visual impact of the project will be experienced.

The operational phase is highly unlikely to result in any significant additional impact. It is possible however, that crews will be visible from time to time undertaking maintenance within the facility.

The main visible elements therefore are likely to include:

- 1. The solar array including minor buildings and structures located within a fence line with an associated on-site substation that is slightly taller than surrounding elements; and
- 2. Possible night time lighting which may be required for operations, security and maintenance purposes.

#### 4.2.2 Thelikely NatureofViews of the ProposedSolar Array

The proposed project layout is indicated on **Map 2**. If a fixed array is used then the PV panels will be mounted on continuous supports and orientated to face north away from the N14 and the Orange River Corridor.

Continuous supports aligned in rows are generally used when the PV panels are fixed and are set at an angle and direction to maximise the average efficiency during the day or have a basic tracking set up that varies the angle of tilt of the unit in order to improve efficiency.

From areas to the north a solar array, whether constructed on individual supports or continuous rows, it is likely to appear as a relatively continuous structure in the landscape.

A tracking array is also constructed in rows that also generallyface a northerly direction. Each row however is divided into units that can be manoeuvred by actuators to follow

the solar azimuth and altitude. Visually this results in greater variety in the nature of the view of the facility with the dark face of the panels being more obvious from the east in the morning and the west in the afternoon. This also means that the outline of the array appears as a jagged edge particularly from close views and the supporting structure may also be more or less exposed depending on the time of day.

The nature of the impact is also likely to vary with location and elevation;

- of PV units are likely to visually combine and will be read as a single unit. From a distance this results in a PV array having a similar appearance as a large industrial structure when viewed from above. It should be noted that the proposed project is unlikely to be viewed from a higher elevation due to the fact that the inselbergs are located on private land and so this type of view will not be possible for the majority of people;
- From the north and if the project is viewed from a similar level, the front row of PV units will be seen in elevation. This is likely to result in the project being seen as a continuous dark line in the landscape possibly with slightly higher elements such as the on-site substation extending above the line. How obvious the dark line is, is likely to be dependent on the distance of the viewer from the project as well as the extent to which the view of the elevation is broken by other elements such as vegetation and landform.
- From the south, east and west the dark face of the PV units is not obvious and subject to the colour of the undersides of the units, the supporting structures are likely to become more apparent. With distance however, the shadow cast by the structures is likely to be more obvious and the facility will probably appear much as views of the northern face, a long dark structure. If the sun should reflect of the rear face of PV panels which is most likely during early morning and late afternoon however, it is likely that the light coloured face of the rear of the panels will make the array obvious;
- If the landscape does not have significant Visual Absorption Capacity (VAC), because of the contrast in colour with the surrounding landscape, the array could be visible to the limit of visibility. Subject to the colour and reflectivity of the underside of the PV units and supporting structure, it is possible that a similar level of impact could also be experienced from the south, east and west. It should be noted that the VAC of the landscape surrounding the proposed development is largely dependent on minor undulations in the surrounding landform as well as vegetation in the Orange River Valley to the south.
- Mitigation or screening of views is possible at least from close views. This can be
  achieved either by earthworks and berms by constructing an opaque screen
  fence, planting or by a combination of both. From a distance and particularly
  from elevated view points, mitigation is likely to be less feasible as the height of
  any screen is likely to cast shadow over the PV units.
- In addition to the way that a solar array may change a landscape, the nuisance factor associated with resulting glare is often raised by stakeholders on similar projects. The front faces of PV units, however, are designed to absorb as much energy as possible. It needs to be borne in mind that the key factor of reflectance is the position of PV modules relative to the sun. A panel that absorbs 90% of direct sunlight may reflect up to 60% when not directly facing the sun. This situation is common for low-tilt panels during sunset and sunrise. The often repeated claim that PV panels reflect less than 5% of sunlight only holds true

when the panels directly face the sun. This means that glare from the front face of PV panels is likely to be less problematic for tracking systems where the angle of panels is optimised throughout the day and is more likely for a fixed array particularly during the early morning and late evening when the sun is lowest.

The site and surrounding area is relatively flat. This means that the array is likely to be viewed largely in elevation or at a low level oblique angle. With the exception of adjacent inselbergs which are all located on private property, there will be no areas from which an overview of the facility will be possible.

To the south of the project the land falls away into the shallow Orange River Valley. Because the project does not extend to the ridgeline on the edge of the valley, it is likely to be largely screened from this area.

Because the proposed PV panels will be set at a maximum height of 3.5m, it is likely that minor buildings, stored equipment within lay down areas and inverters will largely be screened by the array or will be seen below the level of the PV panels.

A new solar array has been developed adjacent to Upington Airport. This array has been developed in two sections on either side of the airport runway. It is somewhat smaller than the subject project, covering approximately 25ha and the longest edge of the array being approximately 500m long. The PV panels are mounted on fixed frames approximately 2m high. Despite obvious differences compared with the proposed project, it does illustrate the effect of distance in mitigating the visibility of the solid line of solar panels.

**Plate 15** indicates the location of the existing array at the Upington Airport. **Plates 16, 17 and 18**, illustrate how the array is seen from distances of approximately 700m, 1500m and 5000m respectively.

The following effects are noted;

- From 700m the array is clearly visible. For the same effect relative to a 3.5m high array, this distance will be approximately 1225m.
- From 1500m, the array is visible but even with the minimal vegetation providing screening at the airport, the dark line of panels is starting to blend into the background. The array is visible but might be missed by a casual viewer. For the same effect relative to a 3.5m high array, this distance will be approximately 2625m.
- From 5000m, the line of panels is indistinguishable from the horizon. For the same effect relative to a 6m high array, this distance will be approximately 8750m.

A single axis tracking system could slightly increase the height of structures particularly during late afternoon and early morning when the units are tilted to their fullest extent.



Plate 15, Existing solar arrays at the Upington Airport as seen from the air



**Plate 16**, Existing array seenin a flat landscape from approximately 700m. The array is clearly visible.



**Plate 17, Existing array seenin a flat landscape from approximately 1500m**. The array is visible but even with the minimal vegetation providing screening at the airport, the dark line of panels is starting to blend into the background. The array is clearly visible but might be missed by a casual viewer who was not aware of its existence.



**Plate 18, Existing array seenin a flat landscape from approximately 5000m**. The line of panels is barely distinguishable. The viewer would have to know where to look to be able to differentiate the array from surrounding landscape features.

#### 4.2.3 The likely Nature of Views of the Proposed On-Site Substation

The proposed on-site substation is reported to have solid elements up to 10m high. These are likely to be comprised of transformers and will appear as solid elements over the height of the adjacent array. These will be viewed as an isolated higher section of the development. It is likely that other taller elements will largely be comprised of steel lattice structures such as bus bars that will facilitate the connection between the onsite substation and the grid connection infrastructure.

#### 4.2.4 The likely Nature of Views of the Proposed Site Access Road

With the exception of road junctions, in a relatively flat landscape where minimal cut and fill is required, the site access road is likely to be most obvious from a distance due to traffic on the road.

It is anticipated that, other than during the operation phase, traffic is likely to be comprised of infrequent light vehicles that are used by operational personnel.

During construction, it is anticipated that regular deliveries will be required by goods vehicles.

From a distance therefore, the access road is likely to be most obvious during the construction phase. During the operation phase it is unlikely to be obvious.

The actual road surface is only likely to be visible to the public from close to the road junction with the N14. Subject to the elevation of the viewer on approach to the road junction, as the surface will be viewed at an acute angle, it will largely be screened by existing low vegetation until the viewer is immediately adjacent to it. It is estimated that neither the actual road surface nor the corridor of cleared vegetation will be highly obvious from a distance exceeding 50m from the junction.

#### 4.2.5 Glare from the PV array

With a fixed array, glare generally occurs when the sun is low in the sky and the angle of incidence is such that light is reflected rather than refracted through the panel surface. The risk of this occurring therefore generally occurs during early morning and late afternoon when the sun hits the PV panels at an acute angle.

Due to the fact that a tracking system realigns receptors to capture as much energy as possible between sunrise and sunset and because of this the sun doesn't hit the PV panels at acute angles, the risk of glare is significantly reduced.

In South Africa, affected areas due to a fixed array during the early morning will generally vary from the west of the array during summer months to the north west of the array during winter months when the rising sun is further north. Affected areas during the late afternoon will generally vary from the east of the array during summer months to the north east of the array during winter months when the setting sun is further north.

An indication of a possible glare issue at the same level as the array can be gained based on simple geometry using plots of sun angle and elevation relative to the face of the solar panels. This provides a two dimensional analysis. For multiple levels such as those associated with an aircraft flight path the mathematics becomes more complex although geometry can be used to check any one point.

Due to the fact that the proposed PV project is located relatively close to the N14, a proprietary set of tools that are available on the "Forgesolar" website (<a href="https://www.forgesolar.com/">https://www.forgesolar.com/</a>) have been used to provide an assessment of likely impacts associated with glare. These tools were originally developed by the Sandia National Laboratories <sup>5</sup>. They provide online tools for mapping solar glare and fluxenabling lay persons to input key data including location, extent, height and power of a proposed array as well as set angles or tracking parameters. This enables the generation of a simple glare analysis providing an indication of timing as well as intensity.

Assessments undertaken using the Forgesolar tools are generally accepted by the US Federal Aviation Authority.

Sandia is a US Government funded research agency similar to South Africa's CSIR. The tools have subsequently been privatised. They are however run and maintained by personnel who undertook their original development.

The Forgesolar model has therefore been used in the assessment of glare impacting on surrounding areas and receptors. Sun path data has been reviewed as part of the assessment in order to ensure that the results from the on line model can be broadly verified.

#### 4.2.6 Security Lighting

The applicant has confirmed that only O&M buildings and Substation to be lit. The PV array will not be lit (with the exception of a small red LED on top weather stations within the plant (usually placed next to the inverters).

This means that the O&M buildings and the substation are likely to be obvious at night whilst the majority of the development will not be obvious.

<sup>&</sup>lt;sup>5</sup>Sandia National Laboratories is operated and managed by Sandia Corporation, a wholly owned subsidiary of Lockheed Martin Corporation. Sandia Corporation operates Sandia National Laboratories as a contractorfor the U.S. Department of Energy's National Nuclear Security Administration (NNSA) and supports numerous federal, state, and local government agencies, companies, and organizations. As a Federally Funded Research and Development Centre (FFRDC), Sandia may perform work for industry responding to certain types of federal government solicitations. The solicitation must allow FFRDC participation and meet the requirements of Sandia's management and operating contract with DOE/NNSA.

### 5 VISIBILITY AND THE LIKELY NATURE OF VIEWS OF THE PROPOSED DEVELOPMENT

#### 5.1 THE EXTENT OF POSSIBLE IMPACTS

The bulk of the proposed project is comprised of the array of PV panels. The majority of other elements including the inverters and buildings will be located amongst the array and will be of a similar or lower height.

The tallest elements are likely to be the transformers associated with the on-site substation. These will be solid elements and could be in the order of 10m high. Other electrical infrastructure such as the bus bars to which the power lines will connect may be taller but these will be largely comprised of lattice structures that are likely to be relatively transparent and will fall within the ZTV of the proposed grid connection.

The development can therefore be described as generally being comprised of elements of a similar height but with an isolated taller element.

In order to provide an indication of the likely limit of visibility, a universally accepted navigational formula has been used to calculate the likely distance that the proposed structures might be visible over(**Appendix III**). This indicates that in a flat landscape the proposed structures may be visible for the following distances;

Approximate ILmit of Visibility (ALV)

ELEMENT	APPROXIMATE LIMIT OF VISIBILITY
Solar PV panels 3.5m high	6.7 kilometres
Substation 10m high	11.3kilometres

In reality these distances could be reduced by:

- Weather conditions that limit visibility. This could include hazy conditions during fine weather as well as mist and rain; and
- Scale and colour of individual elements making it difficult to differentiate structures from the background.
- The fact that as a viewer approaches the Approximate Limit of Visibility (ALV) only a small portion of the development will be visible to the extent that it is likely to be indiscernible to the human eye.

The ALV for solar PV panels and the on-site substation have been used to define an initial study area and they are indicated on mapping.

The lay down area will be used for the storage of equipment and other components required for the project during construction. The extent of views of the lay down area are difficult to assess. It is likely that equipment stored in this area will be of similar height or lower than the proposed PV array. For this reason it is assumed that equipment stockpiled will be incorporated into views of the array.

A smaller lay down area will be required during the operational phase of the project. Again it is assumed that equipment stored here for maintenance operations will be of a similar scale and will have an ALV similar to the PV array.

#### 5.2 ZONES OF THEORETICAL VISIBILITY

Zones of Theoretical Visibility (ZTV) are defined as "a map usually digitally produced showing areas of land within which a development is theoretically visible"<sup>6</sup>.

ZTVs of the proposed development have been assessed using ArcGIS Spatial Analyst toolbox.

The detailed location of the proposed array has been provided by the developer (Map 3). In order to generate the ZTV for the proposed array, it has been assumed that the entire area of the array will be set at a uniform maximum height of 3.5m. Points have been set at each change in direction of the array boundary, an additional point at the centre of the array and a high point in the development footprint all with 3.5m offsets for generation of the ZTV using the Viewshed option in Arc Spatial Analyst.

Similar methodology was adopted for the onsite substation for which a 10m offset has been used to produce the ZTV.

A 2.0m offset has been used in the analysis in order to approximate the eye level of receptors.

Whilst the ZTV has been calculated from terrain data only, existing vegetation could have a modifying effect on the areas indicated. However, given the limited height of surrounding vegetation, this modifying effect is likely to be small and may only be relevant in marginally increasing the screening effect of ridgelines.

The ZTV analysis is indicated on the following maps:

- Map 8 indicates the ZTV for the proposed PV array and internal infrastructure;
- Map 9 indicates the ZTV the on-site substation.

#### 5.2.1 General Visibility

The assessment indicates that the proposed project may be visible to the following areas;

- The proposed array and the substation are likely to be visible over similar areas;
- ii. Views of the proposed array and the substation will be constrained to the north east and south west by minor ridgelines with the development likely to be most visible to the south east including the upper valley slopes of the Orange River Valley and the plateau to the south;
- iii. Views of the development from northern areas are likely to be channelled along the lines of minor ridgelines that are formed by the historic dune field. Affected areas to the north are uninhabited.
- iv. Views of the proposed development from mid to lower slopes within the Orange River Valley are likely to be screened by vegetation;
- v. From the N14, views of the proposed development (array and substation) are likely to be mostly visible from approximately 5km of the road that is closest to the development site. It may also be visible intermittently from the road at a greater distance as it crosses ridgelines;

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<sup>&</sup>lt;sup>6</sup> UK Guidelines

vi. The ZTV analysis indicates that the proposed project could be visible from approximately 2km of the Lutzputs Road. However, this road is well outside the ALV of both the proposed array and substation. It is therefore highly unlikely to be obvious to the human eye.

#### **5.2.2** Specific considerations regarding the nature of impacts

The PV panels will generally be orientated, in a northerly direction, away from the N14 and the Orange River Valley.

From the south and south east, which is the direction from which the majority of receptors will view the proposed projects, the back side of the PV panels and support structures will be visible.

If a fixed array is used, the project will be viewed largely in profile and will be seen as a dark line in the landscape from these directions.

If a tracking array is used the profile from the south east and the south west is likely to change during the day. However, it is still unlikely that the face of the panels will be obvious.

The surrounding landscape has been shown to generally have a relatively low Visual Absorption Capacity. This will likely mean that distant views of the project may be possible, particularly from across the River valley, from which the minor changes in landform will have limited screening effect.

Due to the low height of the infrastructure, the relatively gentle undulations in the plateau landform are likely to provide some degree of screening for motorists using the N14. However, close views are only likely to be possible from immediately adjacent sections of the road.

From within the Orange River Valley, vegetation as well as the landform are likely to provide a significant mitigatory screening effect.

From the Lutzputs road both distance and the generally undulating landform are likely to mean that the proposed project will be largely screened. This road lies well outside the ALV so even if the project is visible it is unlikely to be visually obvious.

Due to the fact that the proposed project is located in a REDZ, a number of additional solar energy projects are likely to be developed in the vicinity of the proposed project. The strategic nature of the REDZ should ensure that there is less demand for similar development in other more sensitive landscape areas. It is therefore highly likely that solar energy projects will become a common sight in the vicinity of the proposed project.

Whilst the majority of the current outlook is relatively natural, the Khi Solar 1 project which is comprised of a Concentrated Solar Power (CSP) Tower and surrounding heliostats is located approximately 10km to the north east. The CSP Tower is 205m high and is potentially visible over a radius of 51km. This facility has therefore already transformed the local landscape. It is also likely that other projects as they are developed will result in the landscape becoming progressively more industrialised.

Whilst industrialisation of the landscape appears to be inevitable, this cannot mean that an "anything goes" approach should be allowed to occur. The importance of the N14 as a tourism route and the need for amenity space around settlements and homesteads

must be considered. In order to achieve this it will be important to ensure that key landscape features are retained and that industrialisation does not completely dominate views from the road.

#### Views from the N14

Due to its tourism importance, the N14 is likely to be one of the most sensitive visual receptors.

Due to proximity, the proposed project is likely to be obvious from approximately 5km of this road. This will be mitigated to a degree by the fact that the development is within a REDZ and that other solar PV projects as well as the Khi Solar 1 CSP project will also be visible within the area.

Due to its limited height, additional mitigatory screening that could be provided by existing vegetation is only likely to be relevant for distance intermittent views as motorists reach the top of minor ridgelines. This effect however is likely to be small.

Of all identified receptors, views of the proposed development are likely to be most obvious from the N14. **Plates 19, 20 and 21** indicate the extent of the view from this road over which the proposed development is likely to be visible. Viewpoints are indicated on **Maps 8 and 9**.

#### Views from the R359

The ZTV analysis indicates that the proposed project could be visible from approximately 20km of the R359. However only approximately 5km section of this road falls inside the ALV of the proposed array and 12km of the road falls within the ALV of the project substation.

In reality the extent of existing vegetation within and on the fringes of the Orange River Valley is likely to mean that the project is unlikely to be obvious from this road although occasional views of the facility may be possible.

#### Views from Adjacent Settlements and Homesteads

Settlements and homesteads in the vicinity of the proposed project that may be affected are generally associated with agricultural activities within the Orange River Valley.

No individual homesteads within the plateau area appear likely to be affected.

The ZTV analysis indicates that the proposed array is most likely to be visible from homesteads that are located on the northern edge of the Orange River Valley that at their closest are located approximately 1km from the proposed array. It is likely that clear views of the proposed project will be possible particularly from the closest homesteads. It is likely however that existing vegetation within and around these homesteads will at least partially screen the proposed development from view.

#### Glare

There are two areas where glare may be a concern for stakeholders including:

- Pilots on the approaches to Upington Airport; and
- Motorists on theN14.

Two array configurations were tested including:

• A fixed array configuration; and

A single axis tracking configuration.

The applicant has confirmed that the latter configuration was the most likely to be used.

#### Results indicate that:

- The fixed configuration could result in a low level of glare affecting pilots on the northern approach to the secondary runway (shorter) at Upington Airport during afternoons (around 15h00) from early to mid-January and during afternoons (around 15h00) from early to late December. Levels of glare are predicted to have a low potential to create an after image that might temporarily make vision difficult for a pilot.
- The fixed configuration is unlikely to create glare that will affect motorists on the N14.
- The single axis tracking configuration is unlikely to create glare that will affect pilots on the approaches to Upington Airport or motorists on the N14.

The assessment is attached as **Appendix IV.** 



**Plate 19 - View from VP1 on the N14.** This viewpoint is located at the top of a minor ridgeline approximately 3.5km to the north east of the proposed development. The array will be seen on the summit of the next ridgeline. It will be seen as a dark line on the ridgeline similar to Plate 17.

The proposed on site substation may be visible extending above the height of the array. However, from this distance it is unlikely to be highly obvious.

It should also be noted that, if authorised, other similar projects will also be seen extending along the ridgeline to right of picture.



**Plate 20 - View from VP2 on the N14.** This viewpoint is located immediately adjacent to the proposed access road from the N14 which is proposed along the alignment of the existing track. The viewpoint is approximately 200m from the proposed substation and array.

The proposed array will extend for almost the entire width of the view. It will be located close to an behind the line of Medium Voltage power line supports that can be seen in the image.

The proposed substation will be visible to the right of picture and is likely to be highly obvious.

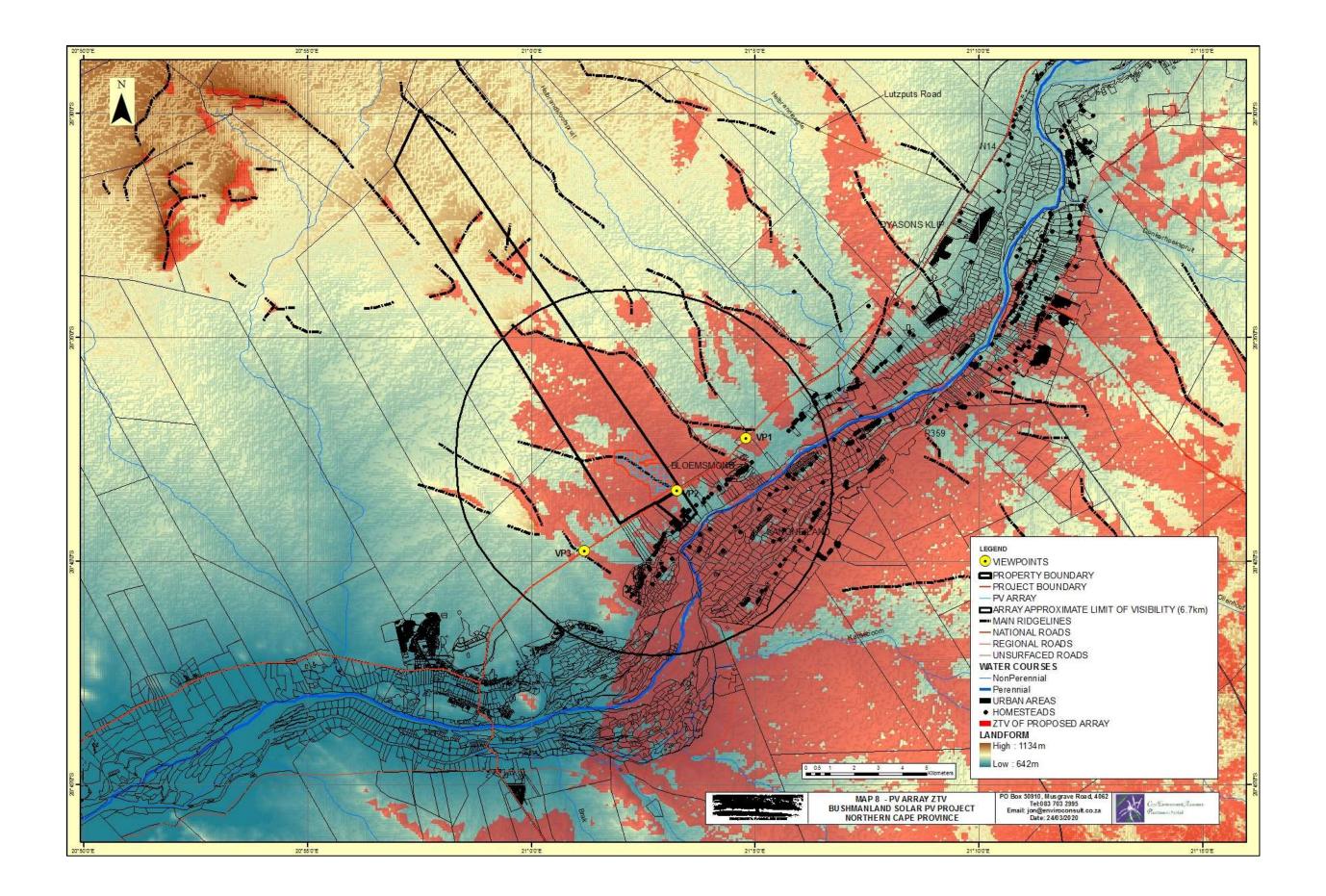
This is the worst case view, a similar level of impact will extend over approximately 500m of the road.

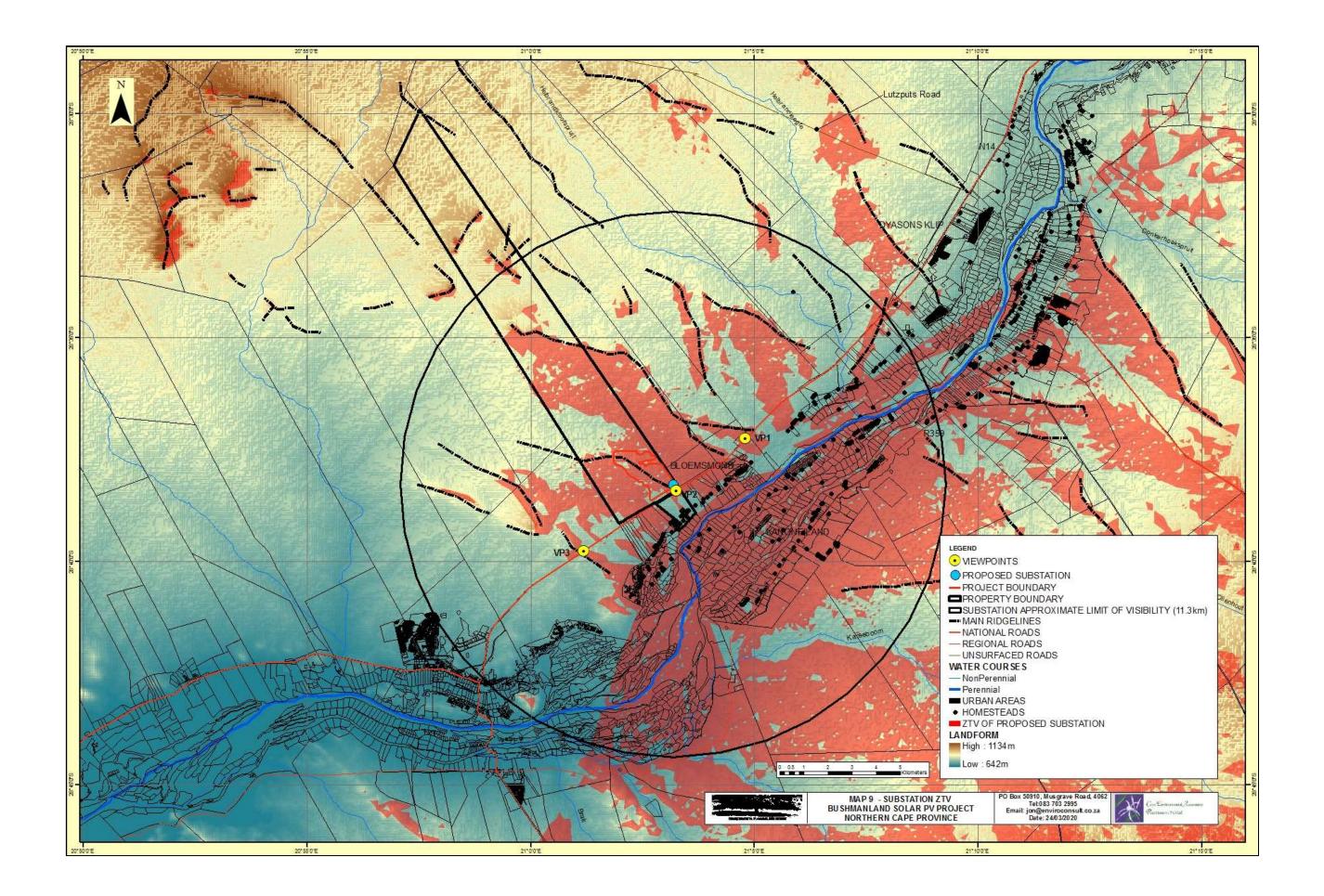


**Plate 21 - View from VP3 on the N14.** This viewpoint is located at the top of a minor ridgeline approximately 3.3km to the south west of the proposed development. The array will be seen on the summit of the next ridgeline. It will be seen as a dark line on the ridgeline similar to Plate 17.

The proposed on site substation may be visible extending above the height of the array. However, from this distance it is unlikely to be highly obvious.

It should also be noted that, if authorised, other similar projects will also be seen extending along the ridgeline to left of picture.





#### **6 VISUAL IMPACT ASSESSMENT**

The previous section of the report identified specific areas where visual impacts may occur as well as their likely nature. This section will attempt to quantify these potential visual impacts in their respective geographical locations and in terms of the identified issues.

#### 6.1 ISSUES TO BE ADDRESSED

The following list of possible impacts have been identified;

- a) The proposed development could change the character and sense of place of the landscape setting;
- b) The proposed development could change the character of the landscape as seen from the N14;
- c) The proposed development could change the character of the landscape as seen from the R359;
- d) The proposed development could change the character of the landscape as seen from the un-surfaced Lutzputs Road to the north and east;
- e) The proposed development could change the character of the landscape as seen from local settlements and homesteads;
- f) Glare impacts; and
- g) Lighting impacts.

These impacts have to be addressed in terms of the proposed solar array and associated infrastructure.

It should be noted that the impacts identified will all gradually increase from the current situation to the impact level indicated during the construction phase, be consistent at the impact levels indicated during the operational phase and decrease again from the levels indicated to close to the current situation during the decommissioning phase.

#### 6.2 ASSESSMENT METHODOLOGY

The methodology for the assessment of potential visual impacts includes:

- The **nature**, which shall include a description of what causes the effect, what will be affected and how it will be affected.
- The **extent**, wherein it will be indicated whether the impact will be local (limited to the immediate area or site of development) or regional:
  - local extending only as far as the development site area assigned a score of 1;
  - limited to the site and its immediate surroundings (up to 10 km) assigned a score of 2;
  - will have an impact on the region assigned a score of 3;
  - will have an impact on a national scale assigned a score of 4; or
  - will have an impact across international borders assigned a score of
     5.
- The duration, wherein it will be indicated whether:
  - the lifetime of the impact will be of a very short duration (0−1 years) –
     assigned a score of 1;

- the lifetime of the impact will be of a short duration (2-5 years) assigned a score of 2;
- \* medium-term (5-15 years) assigned a score of 3;
- \* long term (> 15 years) assigned a score of 4; or
- permanent assigned a score of 5.
- The **magnitude**, quantified on a scale from 0-10, where a score is assigned:
  - \* 0 is small and will have no effect on the environment;
  - 2 is minor and will not result in an impact on processes;
  - \* 4 is low and will cause a slight impact on processes;
  - 6 is moderate and will result in processes continuing but in a modified way;
  - \* 8 is high (processes are altered to the extent that they temporarily cease); and
  - \* 10 is very high and results in complete destruction of patterns and permanent cessation of processes.
- The **probability** of occurrence, which shall describe the likelihood of the impact actually occurring. Probability will be estimated on a scale, and a score assigned:
  - Assigned a score of 1–5, where 1 is very improbable (probably will not happen);
  - Assigned a score of 2 is improbable (some possibility, but low likelihood);
  - Assigned a score of 3 is probable (distinct possibility);
  - \* Assigned a score of 4 is highly probable (most likely); and
  - \* Assigned a score of 5 is definite (impact will occur regardless of any prevention measures).
- The **significance**, which shall be determined through a synthesis of the characteristics described above (refer formula below) and can be assessed as low, medium or high.
- The **status**, which will be described as either positive, negative or neutral.
- The degree to which the impact can be reversed.
- The degree to which the impact may cause irreplaceable loss of resources.
- The *degree* to which the impact can be *mitigated*.
- The **significance** is determined by combining the criteria in the following formula:
  - S=(E+D+M)P; where S = Significance weighting, E = Extent, D = Duration, M = Magnitude, P = Probability

#### The **significance weightings** for each potential impact are as follows:

- < 30 points: Low (i.e. where this impact would not have a direct influence on the decision to develop in the area),
- 30-60 points: Medium (i.e. where the impact could influence the decision to develop in the area unless it is effectively mitigated),
- > 60 points: High (i.e. where the impact must have an influence on the decision process to develop in the area).

#### 6.3 VISUAL IMPACT ASSESSMENT

# 6.3.1 The proposed development could change the character and sense of place of the landscape setting(Landscape Change)

#### **Nature of impact:**

The proposed Bushmanland PVis located within an arid plateau landscape area and approximately 1.2km from the closest section of the verdant Orange River Corridor. The difference between these landscape areas is marked with the semi desert of the plateau contrasting strongly with the green arable landscape of the River Valley.

The ZTV analysis indicates that the development may be visible from within the valley. This is due to the proximity of the proposed development to the valley edge. It is likely however that only the upper most sections of the array will be visible. Existing vegetation within and on the valley edges will largely screen views of the development from within the valley.

Views of the bulk of the proposed development within the plateau landscape will be largely limited to areas in the immediate vicinity of the proposed development by minor ridgelines. These ridgelines will limit views of the development to approximately 2.0km to the north east, the east, the west and the south west. To the north views of the proposed development are likely to be limited to approximately 5km.

The landscape change will be viewed in the context of other solar projects within the area including the Khi Solar 1 CSP project which is located approximately 10km to the northeast. Whilst other projects contribute to landscape change at a local level, due to its height, Khi Solar 1 CSP influences the landscape character over a significantly greater area.

Mitigation in the form of an earthwork bund has been discussed with the project team. However due to ecological and hydrological impacts that are likely to be associated with this proposal, this mitigation method is not favoured. A simple and practical alternative to reduce the industrial nature of views from the road is to use an opaque boundary fence that is coloured to blend with the tones of the existing landscape. This will not present a natural edge to the project as an earthworks solution might. It will however reduce the visual busyness of structures.

	Without mitigation	With mitigation
Extent	Orange River LCA Site and immediate surroundings, (2)	Orange River LCA Site and immediate surroundings, (2)
	Plateau LCA Site and immediate surroundings, (2)	Plateau LCA Site and immediate surroundings, (2)
Duration	Orange River LCA Long term,(4)	Orange River LCA Long term,(4)
	Plateau LCA Long term,(4)	Plateau LCA Long term,(4)
Magnitude	Orange River LCA Small, (2)	Orange River LCA Minor, (0)

	Plateau LCA	Plateau LCA
	Small, <b>(2)</b>	Minor, <b>(0)</b>
Probability	Orange River LCA	Orange River LCA
- 1	Improbable, (2)	Improbable, (2)
	Plateau LCA	Plateau LCA
	Probable, (3)	Improbable, (2)
Significance	Orange River LCA	Orange River LCA
	Low, <b>(16)</b>	Low, <b>(12)</b>
	Plateau LCA	Plateau LCA
	Low, <b>(24)</b>	Low, <b>(12)</b>
Status	Negative	Negative
Reversibility	High	High
Irreplaceable	The proposed development	No irreplaceable loss
loss	can be dismantled and	
	removed at the end of the	
	operational phase.	
	There will therefore be <b>no</b>	
	irreplaceable loss. However,	
	given the likely long term	
	nature of the project, it is	
	possible that a proportion of	
	stakeholders will view the loss	
	of view as irreplaceable.	
Can impacts	Yes	N/A
be mitigated?		

#### Mitigation / Management:

#### Planning:

- Investigate the possibility of undertaking screen fencing;
- Plan to maintain the height of structures as low as possible;
- Minimise disturbance of the surrounding landscape and maintain existing vegetation around the development;

#### Operations:

- Undertake screening;
- Reinstate any areas of vegetation that have been disturbed during construction;
- Remove all temporary works;
- Monitor rehabilitated areas post-construction and implement remedial actions;
- Minimise disturbance and maintain existing vegetation as far as is possible both within and surrounding the development area.

#### Decommissioning:

- Remove infrastructure not required for the post-decommissioning use of the site;
- Rehabilitate and monitor areas post-decommissioning and implement remedial actions.

#### **Cumulative Impacts:**

The proposed project will extend the general influence of development and specifically solar projects in the area.

The overall cumulative impact is assessed as having a medium significance, however, the contribution of the proposed project to this cumulative impact is assessed as low. **See appendix V.** 

#### Residual Risks:

The residual risk relates to loss of natural vegetation cover being obvious on decommissioning of the proposed project. It is therefore critical that effective rehabilitation is undertaken.

## 6.3.2 The proposed development could change the character of the landscape as seen from the N14.

#### **Nature of impact:**

The ZTV analysis indicates that views of the proposed array and substation will be limited to approximately 5km of this road at a distance of approximately 0.2kmThe proposed array and the proposed substation are likely to be obvious.

The proposed project will also be viewed in the context of numerous other solar projects within the REDZ7 including the Khi Solar 1 project which is visible over a wide area. However, all other PV projects in the vicinity are set back a number of kilometres from the road. Whilst this does not mean that they are not visible, it does make them less obvious and presents a relatively natural foreground to views from the road.

Mitigation in the form of an earthwork bund has been discussed with the project team. However due to ecological and hydrological impacts that are likely to be associated with this proposal, this mitigation method is not favoured. A simple and practical alternative to reduce the industrial nature of views from the road is to use an opaque boundary fence that is coloured to blend with the tones of the existing landscape. This will not present a natural edge to the project as an earthworks solution might. It will however reduce the visual busyness of structures.

	Without mitigation	With mitigation		
Extent	Site and immediate	Site and immediate surroundings		
	surroundings (2)	(2)		
Duration	Long term(4)	Long term(4)		
Magnitude	Low(4)	Minor to low(3)		
Probability	Highly probable <b>(4)</b>	Probable(3)		
Significance	Medium(40)	Low <b>(27)</b>		
Status	Given that the area is developing as a renewable energy development zone, it is possible that some people will see the development in a positive light. For those visiting the area for its natural attributes and for residents whose view is affected the change is likely to be seen as a <b>Negative Impact.</b>	Negative Impact		
Reversibility	High	High		
Irreplaceable loss	The proposed development can be dismantled and removed at the end of the operational phase. There will therefore be <b>no irreplaceable loss</b> .	No irreplaceable loss.		
Can impacts be mitigated?	Yes			
Mitigation / Ma	nagement:			

#### Planning:

- Investigate the possibility of undertaking screen fencing;
- Plan to maintain the height of structures as low as possible;
- Minimise disturbance of the surrounding landscape and maintain existing vegetation around the development;

#### Operations:

- Undertake screening;
- Reinstate any areas of vegetation that have been disturbed during construction;
- Remove all temporary works;
- Monitor rehabilitated areas post-construction and implement remedial actions;
- Minimise disturbance and maintain existing vegetation as far as is possible both within and surrounding the development area.

#### Decommissioning:

- Remove infrastructure not required for the post-decommissioning use of the site;
- Rehabilitate and monitor areas post-decommissioning and implement remedial actions.

#### Cumulative Impacts:

The proposed project will have a medium level impact on the N14 without mitigation.

A detailed visual analysis of other solar projects in the area has not been undertaken, however, it is likely that other solar projects in the area could have a significant greater impact.

The overall cumulative impact is assessed as having a medium significance. The contribution of the proposed project to this cumulative impact is assessed as medium however this will reduce to low with mitigation.

#### See Appendix V.

#### Residual Risks:

The residual risk relates to loss of natural vegetation cover being obvious on decommissioning of the proposed project. It is therefore critical that effective rehabilitation is undertaken.

## 6.3.3 The proposed development could change the character of the landscape as seen from the R359.

#### **Nature of impact:**

The ZTV analysis indicates that the proposed project could be visible from significant sections of the R359 at distances in excess of 5km.

Howeve,r there is significant vegetation both within the Orange River Valley and beside the road that is likely to screen the development from large sections of the road.

Whilst the likely impact without mitigation has a low significance, mitigation measures proposed to reduce visibility to the N14 is also likely to largely mitigate impacts on the R359.

	Without mitigation		With mitigation				
Extent	Site surround	and dings (2)		Site a	and	immediate	surroundings

Duration	Long term(4)	Long term(4)
Magnitude	Minor(2)	Small (0)
Probability	Improbable(2)	Very improbable(1)
Significance	Low (16)	Low (6)
Status	Given that the area is developing as a renewable energy development zone, it is possible that some people will see the development in a positive light.  For those visiting the area for its natural attributes and for residents whose view is affected, the change may be seen as a Negative Impact. However, due to distance, the likely degree of existing screening of the proposed development and because if small sections of the development are visible they will be seen in the context of other solar projects, the change in view is likely to be	Neutral Impact
Reversibility	seen as a <b>neutral impact</b> . High	High
Irreplaceable loss	The proposed development can be dismantled and removed at the end of the operational phase.  There will therefore be no irreplaceable loss.	No irreplaceable loss.
Can impacts be mitigated?	<b>Yes</b> but mitigation is unlikely to	affect the assessed levels of impact.

#### Mitigation / Management:

#### Planning:

- Plan to maintain the height of structures as low as possible;
- Minimise disturbance of the surrounding landscape and maintain existing vegetation around the development;

#### Operations:

- Remove all temporary works;
- Minimise disturbance and maintain existing vegetation as far as is possible both within and surrounding the development area.

#### Decommissioning:

- Remove infrastructure not required for the post-decommissioning use of the site:
- Rehabilitate and monitor areas post-decommissioning and implement remedial actions.

#### Cumulative Impacts:

The proposed project will have a low level impact on the R359.

A detailed visual analysis of other solar projects in the area has not been undertaken, however, it is likely that only CSP projects in the area which have taller elements could have a significant impact on this road.

The overall cumulative impact is assessed as having a Medium significance. The contribution of the proposed project to this cumulative impact is assessed as low.

#### See Appendix V.

#### Residual Risks:

The residual risk relates to loss of natural vegetation cover being obvious on decommissioning of the proposed project. It is therefore critical that effective rehabilitation is undertaken.

## 6.3.4 The proposed development could change the character of the landscape as seen from the Lutzputs Road.

#### **Nature of impact:**

The ZTV analysis indicates that the proposed project is highly unlikely to be visually obvious from this road.

There will therefore be no impact and no contribution to cumulative impacts.

## 6.3.5 The proposed development could change the character of the landscape as seen from local settlements and homesteads.

#### **Nature of impact:**

Settlements and homesteads in the vicinity of the proposed project that may be affected are generally associated with agricultural activities within the Orange River Valley.

No individual homesteads within the plateau area appear likely to be affected.

The ZTV analysis indicates that the proposed array is most likely to be visible from homesteads that are located on the northern edge of the Orange River Valley that, at their closest, are located approximately 1km from the proposed array. It is likely that clear views of the proposed project will be possible particularly from the closest homesteads. However, it is likely that existing vegetation within and around these homesteads will at least partially screen the proposed development from view.

Whilst the likely impact without mitigation has a low significance, mitigation measures proposed to reduce visibility to the N14 are also likely to help to mitigate impacts on the settlements and homesteads.

	Without mitigation	With mitigation		
Extent	Site and immediate surroundings (2)	Site and immediate surroundings (2)		
Duration	Long term (4)	Long term (4)		
Magnitude	Minor (2)	Small(0)		
Probability	Improbable(2)	Improbable(2)		
Significance	Low(16)	Low(12)		

Status	Given that the area is developing as a renewable energy development zone, it is possible that some people will see the development in a positive light.  For residents whose view is affected the change is likely to be seen as a <b>Negative Impact.</b>	Negative Impact
Reversibility	High	
Irreplaceable	No irreplaceable loss	
loss		
Can impacts be mitigated?	No mitigation required	

#### Mitigation / Management:

#### Planning:

- Investigate the possibility of undertaking screening;
- Plan to maintain the height of structures as low as possible;
- Minimise disturbance of the surrounding landscape and maintain existing vegetation around the development;

#### Operations:

- Undertake screening;
- Reinstate any areas of vegetation that have been disturbed during construction;
- · Remove all temporary works;
- Monitor rehabilitated areas post-construction and implement remedial actions;
- Minimise disturbance and maintain existing vegetation as far as is possible both within and surrounding the development area.

#### Decommissioning:

 Remove infrastructure not required for the post-decommissioning use of the site;

Rehabilitate and monitor areas post-decommissioning and implement remedial actions.

#### **Cumulative Impacts:**

Visual impacts on settlements and homesteads associated with the proposed project have been assessed as having a low significance.

General visual impacts in the region due to solar projects are also assessed as likely to have a low level of impact due to the fact that most settlements and homesteads are located within the Orange River Valley

The overall cumulative impact is assessed as having a Low significance. The contribution of the proposed project to this cumulative impact is also assessed as low.

#### See Appendix V.

#### Residual Impacts:

The residual risk relates to the infrastructure being left in place on decommissioning of the solar project. It is therefore critical that effective rehabilitation is undertaken.

#### 6.3.6 Glare Impacts.

#### Nature of impact:

There are two areas where glare could be a concern to stakeholders, including:

- a) Upington Airport; and
- b) The N14.

Two array configurations have been tested including:

- A fixed array; and
- A single axis tracking array

The assessment has shown that neither configuration will cause glare to affect motorists on the adjacent N14. It is possible however that the fixed array could cause low levels of glare to affect pilots on their approach to the secondary (shorter) runway at Upington Airport. However, this glare is unlikely to result in an after image that might result in temporary loss of vision for pilots. It is therefore not considered to be critical.

	Without mitigation	With mitigation
Extent	Region(3)	Region(3)
Duration	Long term (4)	Long term (4)
Magnitude	Minor(2)	Small(0)
Probability	Probable(3)	Very improbable (1)
Significance	Low(27)	Low <b>(7)</b>
Status	Negative	Neutral
Irreplaceable	No irreplaceable loss	No irreplaceable loss
loss	•	
Reversibility	High	High
Can impacts	Yes	
be mitigated?		

#### Mitigation / Management:

• Adopt a tracking configuration for the proposed array

#### **Cumulative Impact:**

There is potential for other arrays to also cause glare that could affect approaches to the airport.

The proposed array will result in a low level contribution to cumulative glare impacts. With mitigation, there will be no contribution to cumulative impacts.

#### See appendix IV.

#### Residual Risks:

No residual risk has been identified.

# 6.2.7 The potential visual impact of operational, safety and security lighting of the facility at night on observers.

#### **Nature of impact:**

The O & M buildings and the substation will be lit by security lights to a level sufficient to ensure that security cameras can operate at night. This is likely to result in the array being obvious at night from surrounding areas.

The Khi 1 Solar project immediately to the north appears relatively dark at night.

There are obvious lights from Upington as well as from passing traffic and small settlements and homesteads particularly in the Orange River Valley.

The area therefore is not totally dark during the night.

There is potential therefore for the project to add to these existing lighting levels.

THE STEP STEEL	Without mitigation	
	Without mitigation	With mitigation
Extent	Site and immediate surroundings (2)	Site <b>(1)</b>
Duration	Long term (4)	Long term (4)
Magnitude	Low <b>(4)</b>	Small to minor (1)
Probability	Definite (5)	Improbable (2)
Significance	Medium (50)	Low <b>(12)</b>
Status	The appearance of a large lit area may be accepted by most people because it is so close to the N14. It is likely however that some people will see the expansion of lighting as a <b>negative</b> impact.	If the lights are generally not visible then the occasional light is unlikely to be seen as negative.  Neutral
Irreplaceable loss	It would be possible to change the lighting / camera system so the impact cannot be seen as an irreplaceable loss.	No irreplaceable loss
Reversibility	High	High
Can impacts be mitigated?	Yes	

#### Mitigation / Management:

- Use low key lighting around buildings and operational areas that is triggered only when people are present.
- Plan to utilise infra-red security systems or motion sensor triggered security lighting;
- Ensure that lighting is focused on the development with no light spillage outside the site; and
- Keep lighting low, no tall mast lighting should be used.

#### **Cumulative Impact:**

There is potential for security lighting and operational lighting associated with solar energy projects to further impact on the area but with mitigation the contribution of this project to possible cumulative impacts is likely to be of low significance.

#### See appendix IV.

#### Residual Risks:

No residual risk has been identified.

#### 7 IMPACT STATEMENT

#### 7.1 VISIBILITY

The limited height of the bulk of the proposed development helps to limit visibility.

The natural grain of the landform is formed by small ridgelines that are remnants of an historic dune field running approximately north north-west to south south-east. This landform channels views to the north of the site. Due to the relatively low height of the bulk of the proposed infrastructure, this subtle landform is likely to play a major role in moderating views of the proposed development.

The analysis indicates that:

- i. The proposed array and the substation are likely to be visible over similar areas:
- ii. Views of the proposed array and the substation will be constrained to the north east and south west by minor ridgelines with the development likely to be most visible to the south east including the upper valley slopes of the Orange River Valley and the plateau to the south;
- iii. Views of the development from northern areas are likely to be channelled along the lines of minor ridgelines that are formed by the historic dune field. Affected areas to the north are uninhabited.
- iv. Views of the proposed development from mid to lower slopes within the Orange River Valley are likely to be screened by vegetation;
- v. From the N14, views of the proposed development (array and substation) are likely to be mostly visible from approximately 5km of the road that is adjacent to the project. It may also be visible intermittently from the road as it crosses ridgelines;
- vi. The ZTV analysis indicates that the proposed project could be visible from approximately 2km of the Lutzputs Road. However, this road is well outside the ALV of both the proposed array and substation. It is therefore highly unlikely to be obvious to the human eye.

#### 7.2 LANDSCAPE CHARACTER AREAS AND VISUAL ABSORPTION CAPACITY

The affected landscape can generally be divided into the following LCAs that are largely defined by vegetation, topography and drainage patterns.

- Plateau LCA which includes the gently undulating, arid plateau above the
  Orange River Valley. This area is generally natural in character with very little
  settlement. It is obvious form Map 2 (Context) that the character of this area
  is in transition in that solar projects are likely to create an industrial aesthetic
  within a matrix of natural vegetation. VAC within this area is only provided by
  the regular, low, dune formation as well as slopes of the slightly larger minor
  valleys that are associated with the non-perennial water courses that flow into
  the Orange River Valley.
- The Orange River Corridor LCA which is comprised of the shallow valley area surrounding the Orange River. This area is generally inward looking drawing little character influence from the surrounding plateau. Landform, vegetation and development all play a role in screening views of surrounding areas and contribute to significant VAC.

#### 7.3 SENSITIVE RECEPTORS

Identified visual receptors include:

- Area Receptors which include the minor urban settlement areas that are located within the River Corridor LCA. From the site visit it appears that the majority of settlement areas relate to agricultural use of the River Valley. It is likely that the residents of these minor settlements are predominantly focused on agricultural production of the area. As these settlements are located within the River Valley LCA, it is likely that views of the proposed development particularly from the northern side of the valley will be difficult. It is also likely that vegetation within the River Valley will at least partially screen any views of the proposed development that may be possible from the higher sections of the southern valley slopes;
- Linear Receptors or routes through the area that include the N14, the R359, and the Lutzputsroad. Both the N14 and the R359 roads have tourism significance, although the N14 is possibly the most important in this regard;
- The Lutzputs road is an un-surfaced road that at its closest runs approximately 14km to the northeast of the proposed site; and
- Point Receptors that include individual homesteads that are located both within the River Valley LCA and the Plateau LCA. From the site visit, it is unlikely that settlement on the northern side of the Orange River will have views towards the proposed development. It is however possible that receptors on the higher sections on the southern side of the valley could have views of the proposed development. However, will be distant views and are likely to be softened by vegetation within the River Valley.

#### 7.4 VISUAL IMPACT

Visual impacts are likely to include;

- a) The general change in character of the landscape due to the proposed development was assessed as low. This is due to the limited area over which the proposed development is likely to be visible as well as the fact that the landscape is partly industrialised by other solar projects that are either operational or under construction;
- b) The impact due to the possible change in view as seen from the N14 was assessed as medium without mitigation. This is due to the proximity of the project to the road the impact of which is partly mitigated by the limited area over which the proposed development is likely to be visible as well as the fact that the landscape is partly industrialised by other solar projects that are under construction. With mitigation that could include screening, this impact could reduce to a low level of significance;
- c) The impact due to the possible change in view as seen from the R359 was assessed as low. This is due to the fact that views of the development are likely to be significantly screened / softened by vegetation within and on the edge of the Orange River Valley;
- d) The impact due to the possible change in view as seen from homesteads and settlements was assessed as low. This is due to the fact that existing vegetation is likely to significantly screen / soften views of the proposed development;
- e) A detailed glare assessment found that there is a possibility that a fixed array could cause low levels of glare to affect pilots on the northern approach to the secondary runway at Upington Airport during afternoons in early January and early to late December. However, this is unlikely to create an after image that

- could result in temporary impairment of vision. This may be mitigated by adopting a tracking configuration; and
- f) The impact of lighting in changing the nature of the night time landscape was assessed having a medium significance without mitigation but with mitigation lighting levels are likely to be low and similar to those in the surrounding area.

#### 7.5 CUMULATIVE IMPACTS

In terms of general landscape change, the overall cumulative impact associated with solar projects within the area were assessed as having a medium significance. However, the contribution of the proposed project to this cumulative impact is assessed as low.

Cumulative visual impacts associated with solar projects within the area on the N14 were assessed as having a medium significance. The likely contribution to cumulative visual impacts associated with the proposed project was also assessed as having a medium significance. This contribution is likely to reduce to a low significance with mitigation.

Cumulative visual impacts associated with solar projects within the areaon the R359 were assessed as having a medium significance. The likely contribution to cumulative visual impacts associated with the proposed project was also assessed as having a low significance both with and without mitigation.

The proposed project is highly unlikely to have a visual impact on the Lutzputs Road. It is therefore unlikely to contribute to cumulative visual impacts on this receptor.

As the proposed project is unlikely to result in glare impacts on either pilots on approaches to the Upington Airport or motorists on the N14 it is unlikely to contribute to cumulative glare impacts.

There is potential for security lighting and operational lighting associated with solar energy projects to have a significant impact in a rural region where lighting levels are limited to traffic on roads passing through the area and low level lighting associated with homesteads and small settlements. With appropriate mitigation however, general lighting levels are likely to be low and largely in keeping with surrounding areas.

#### 7.5 CONCLUSION

In assessing the impacts, it has been recognised that the proposed project will have some visual impacts on the surrounding landscape. However, this should be considered within the context of the following:

- All impacts have been assessed as low post mitigation.
- Mitigation measures are achievable.
- Existing solar projects in the area already impose on the visual landscape.
- The project is located within the Upington REDZ, Therefore, the development of renewable energy facilities is expected in the area.
- The structures associated with this project can be removed on decommissioning, after which the landscape can be restored through rehabilitation.
- Although the cumulative visual impacts within the region will increase as more solar facilities are developed, the overall contribution of this project has been assessed as low.

Therefore, the proposed project is in keeping with its surroundings and will not impact significantly on receptors that are likely to be sensitive to landscape change associated with the project.

It is concluded that the potential loss of scenic resources are not sufficiently significant to present a fatal flaw to the proposed project. Both a fixed configuration and tracking configuration are acceptable, although a tracking configuration is preferred.

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#### **APPENDIX I**

#### **SPECIALIST'S BRIEF CV**



ENVIRONMENTAL PLANNING AND DESIGN

Name JONATHAN MARSHALL

**Nationality** British **Year of Birth** 1956

**Specialisation** Landscape Architecture / Landscape & Visual Impact Assessment

/ Environmental Planning / Environmental Impact Assessment.

Qualifications

<u>Education</u> Diploma in Landscape Architecture, Gloucestershire College of Art

and Design, UK (1979)

Environmental Law, University of KZN (1997)

<u>Professional</u> Registered Professional Landscape Architect (SACLAP)

Chartered Member of the Landscape Institute (UK)

Member of the International Association of Impact Assessment,

South Africa

**Languages** <u>English</u>- Speaking - Excellent

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#### General

Jon qualified as a Landscape Architect (Dip LA) at Cheltenham (UK) in 1979. He has been a Chartered Member of the Landscape Institute UK since 1986. He is a registered Professional Landscape Architect and he has also worked as an Environmental Assessment Practitioner within South Africa.

During the early part of his career (1981 - 1990) He worked with Clouston (now RPS) in Hong Kong and Australia. During this period he was called on to undertake landscape and visual impact assessment (LVIA) input to numerous environmental assessment processes for major infrastructure projects. This work was generally based on photography with line drawing superimposed to illustrate the extent of development visible.

He has worked in the United Kingdom (1990 - 1995) for major supermarket chains including Sainsbury's and prepared CAD based visual impact assessments for public enquiries for new store development. He also prepared the LVIA input to the environmental statement for the Cardiff Bay Barrage for consideration by the UK Parliament in the passing of the Barrage Act (1993).

His more recent LVIA work (1995 to present) includes a combination of CAD and GIS based work for a new international airport to the north of Durban, new heavy industrial operations, overhead electrical transmission lines, mining operations in West Africa and numerous commercial and residential developments.

LVIA work undertaken recently includes assessments for a new Eskom gas fired power station, two proposed private power stations, numerous solar and wind energy projects, a proposed cable car development in the Drakensberg and tourism related development within iSimangiliso Wetland Park and the Kruger National Park.

#### Select List of Landscape & Visual Impact Assessment Projects

- **Selati Railway Bridge** Landscape and Visual Impact Assessment for proposed development of up-market accommodation on a railway bridge at Skukuza in the Kruger Park.
- Eskom Combined Cycle Power Plant -Landscape and Visual Impact Assessment for proposed gas power plant in Richards Bay, KwaZulu Natal Province.
- Olifantshoek Power Line and Substation Landscape and Visual Impact Assessment for a proposed 31km 132kV power line and 10MVA substation in Olifantshoek in the Northern Cape Province.
- Jozini TX Tower Landscape and Visual Impact Assessment for a proposed telecommunications
  mast above Jozini Dam in KwaZulu Natal Province.
- Macapanstad Agri-Park Development Landscape and Visual Impact Assessment for a proposed agri-park in the North West Province.
- **Gunstfontein Wind Farm Amendment** Landscape and Visual Impact Assessment for a proposed change in rotor size, hub height and layout of an authorised wind farm near Sutherland in the Northern Cape Province.
- **Great Karoo Wind Farm Amendment -** Landscape and Visual Impact Assessment for a proposed change in rotor size, hub height and layout of an authorised wind farm near Sutherland in the Northern Cape Province.
- Mpushini Park Mixed Use Development Landscape and Visual Impact Assessment for a proposed change in development height and density of a mixed use development near Pietermaritzburg in KwaZulu Natal.
- Aggeneys PV Solar Project Landscape and Visual Impact Assessment for a proposed solar farm near Aggeneys in the Northern Cape.
- **Sirius PV Solar Project** Landscape and Visual Impact Assessment for a proposed solar farm near Upington in the Northern Cape.
- **Hyperion PV Solar Project** Landscape and Visual Impact Assessment for a proposed solar farm in near Kathu in the Northern Province.
- **Moeding PV Solar Project** Landscape and Visual Impact Assessment for a proposed solar farm in Vryburg.
- **Kangala Mine Extension** Landscape and Visual Impact Assessment for a proposed extension to an open cast coal mine in Mpumalanga Province for Universal Coal.
- N2 Section 20 Wild Coast, road upgrades, borrow pits and quarry sites Landscape and Visual Impact Assessment for the NRA through KSEMS Environmental Consulting
- Establishment of Upmarket Tourism Accommodation on the Selati Bridge, Kruger National Park Assessment of visual implications of providing tourism accommodation in 12 railway carriages on an existing railway bridge at the Skukuza Rest Camp in the Kruger Park.
- Palesa Power Station Landscape and Visual Impact Assessment for a new 600MW power station near Kwamhlanga in Mpumalanga for a private client.
- **Heuningklip PV Solar Project** Landscape and Visual Impact Assessment for a solar project in the Western Cape Province for a private client.
- Kruispad PV Solar Project Landscape and Visual Impact Assessment for a solar project in the Western Cape Province for a private client.
- **Doornfontein PV Solar Project** Landscape and Visual Impact Assessment for a solar project in the Western Cape Province for a private client.
- Olifantshoek Power Line and Substation Landscape and Visual Impact Assessment for a new 10MVA 132/11kV substation and 31km powerline, Northern Cape Province, for Eskom.
- **NoupoortConcentrating Solar Plants -** Scoping and Visual Impact Assessments for two proposed parabolic trough projects.
- Drakensberg Cable Car Preliminary Landscape and Visual Impact Assessment and draft terms
  of reference as part of the feasibility study.

- Paulputs Concentrating Solar Plant (tower technology) Landscape and Visual Impact Assessment for a new CSP project near Pofadder in the Northern Cape.
- Ilanga Concentrating Solar Plants 1, 2, 3, 4 & 5 Scoping and Visual Impact Assessments for the proposed extension of five authorised CSP projects including parabolic trough and tower technology within the Karoshoek Solar Valley near Upington in the Northern Cape.
- Ilanga Concentrating Solar Plants 1, 2, 3, 4 & 5 Shared Infrastructure Landscape and Visual Impact Assessment for the necessary shared infrastructure including power lines, substation, water pipeline and roads for these projects.
- Ilanga Concentrating Solar Plants 7, 8 & 9 Scoping and Visual Impact Assessments for three new CSP projects including parabolic trough and tower technology within the Karoshoek Solar Valley near Upington in the Northern Cape.
- **Sol Invictus Solar Plants** Scoping and Visual Impact Assessments for three new Solar PV projects near Pofadder in the Northern Cape.
- Gunstfontein Wind Energy Facility

   Scoping and Visual Impact Assessment for a proposed WEF near Sutherland in the Northern Cape.
- **Moorreeesburg Wind Energy Facility** Landscape and Visual Impact Assessment for a proposed WEF near Moorreeesburg in the Western Cape.
- **Semonkong Wind Energy Facility** Landscape and Visual Impact Assessment for a proposed WEF near Semonkong in Southern Lesotho.
- Great Karoo Wind Energy Facility Addendum report to the Landscape and Visual Impact
  Assessment Report for amendment to this authorised WEF that is located near Sutherland in the
  Northern Cape. Proposed amendments included layout as well as rotor diameter.
- Perdekraal East Power Line Landscape and Visual Impact Assessment for a proposed power line to evacuate power from a wind energy facility near Sutherland in the Northern Cape.
- Tshivhaso Power Station Scoping and Landscape and Visual Impact Assessment for a proposed new power station near Lephalale in Limpopo Province.
- Saldanha Eskom Strengthening Scoping and Landscape and Visual Impact Assessment for the upgrading of strategic Eskom infrastructure near Saldanha in the Western Cape.
- **Eskom Lethabo PV Installation** Scoping and Landscape and Visual Impact Assessment for the development of a solar PV plant within Eskom's Lethabo Power Station in the Free State.
- **Eskom Tuthuka PV Installation** Scoping and Landscape and Visual Impact Assessment for the development of a solar PV plant within Eskom's Thutuka Power Station in Mpumalanga.
- **Eskom Majuba PV Installation** Scoping and Landscape and Visual Impact Assessment for the development of a solar PV plant within Eskom's Majuba Power Station in Mpumalanga.
- Golden Valley Power Line Landscape and Visual Impact Assessment for a proposed power line to evacuate power from a wind energy facility near Cookhouse in the Eastern Cape.
- **Mpophomeni Shopping Centre** Landscape and Visual impact assessment for a proposed new shopping centre close to the southern shore of Midmar Dam in KwaZulu Natal.
- Rheeboksfontein Power Line Addendum report to the Landscape and Visual Impact Assessment Report for amendment to this authorised power line alignment located near Darling in the Western Cape.
- Woodhouse Solar Plants Scoping and Landscape and Visual Impact Assessment for two proposed solar PV projects near Vryburg in the North West Province.
- AngloGold Ashanti, Dokyiwa (Ghana) Landscape and Visual Impact Assessment for proposed new Tailings Storage Facility at a mine site working with SGS as part of their EIA team.
- Gateway Shopping Centre Extension (Durban) Landscape and Visual Impact Assessment for a proposed shopping centre extension in Umhlanga, Durban.
- Kouroussa Gold Mine (Guinea) Landscape and Visual impact assessment for a proposed new mine in Guinea working with SGS as part of their EIA team.
- Mampon Gold Mine (Ghana) Landscape and Visual impact assessment for a proposed new

- mine in Ghana working with SGS as part of their EIA team.
- Telkom Towers Landscape and Visual impact assessments for numerous Telkom masts in KwaZulu Natal.
- Eskom Isundu Substation Landscape and Visual Impact Assessment for a proposed major new Eskom substation near Pietermaritzburg in KwaZulu Natal.
- Eskom St Faiths Power Line and Substation Landscape and Visual Impact Assessment for a major new substation and associated power lines near Port Shepstone in KwaZulu Natal.
- **Eskom Ficksburg Power Line** Landscape and Visual Impact Assessment for a proposed new power line between Ficksburg and Cocolan in the Free State.
- Eskom Matubatuba to St Lucia Power Line Landscape and Visual Impact Assessment for a proposed new power line between Mtubatuba and St Lucia in KwaZulu Natal.
- Dube Trade Port, Durban International Airport Landscape and Visual Impact Assessment
- **Sibaya Precinct Plan** Landscape and Visual Impact Assessment as part of Environmental Impact Assessment for a major new development area to the north of Durban.
- **Umdloti Housing** Landscape and Visual Impact Assessment as part of Environmental Impact Assessment for a residential development beside the Umdloti Lagoon to the north of Durban.
- Tata Steel Ferrochrome Smelter Landscape and Visual Impact Assessment of proposed new Ferrochrome Smelter in Richards Bay as part of EIA undertaken by the CSIR.
- Durban Solid Waste Large Landfill Sites Landscape and Visual Impact Assessment of proposed development sites to the North and South of the Durban Metropolitan Area. The project utilised 3d computer visualisation techniques.
- Hillside Aluminium Smelter, Richards Bay Landscape and Visual Impact Assessment of proposed extension of the existing smelter. The project utilised 3d computer visualisation techniques.
- Estuaries of KwaZulu Natal Phase 1 Visual character assessment and GIS mapping as part
  of a review of the condition and development capacity of eight estuary landscapes for the Town
  and Regional Planning Commission. The project was extended to include all estuaries in KwaZulu
  Natal.
- **Signage Assessments** Numerous impact assessments for proposed signage developments for Blast Media.
- **Signage Strategy** Preparation of an environmental strategy report for a national advertising campaign on National Roads for Visual Image Placements.
- **Zeekoegatt, Durban** Computer aided Landscape and Visual ImpactAssessment. EDP acted as advisor to the Province of KwaZulu Natal in an appeal brought about by a developer to extend a light industrial development within a 60 metre building line from the National N3 Highway.
- La Lucia Mall Extension Landscape and Visual Impact Assessment using three dimensional computer modelling / photo realistic rendering and montage techniques for proposed extension to shopping mall for public consultation exercise.
- **Redhill Industrial Development** Landscape and Visual Impact Assessment using three dimensional computer modelling / photo realistic rendering and montage techniques for proposed new industrial area for public consultation exercise.
- Avondale Reservoir Landscape and Visual Impact Assessment using three dimensional computer modelling / photo realistic rendering and montage techniques for proposed hilltop reservoir as part of Environmental Impact Assessment for Umgeni Water.
- Hammersdale Reservoir Landscape and Visual Impact Assessment using three dimensional computer modelling / photo realistic rendering and montage techniques for proposed hilltop reservoir as part of Environmental Impact Assessment for Umgeni Water.
- **Southgate Industrial Park, Durban** Computer Aided Landscape and Visual Impact Assessment and Landscape Design for AECI.

- **Sainsbury's Bryn Rhos** Computer Aided Landscape and Visual Impact Assessment / Planning Application for the development of a new store within the Green Wedge North of Swansea.
- Ynyston Farm Access Computer Aided Impact Assessment of visual intrusion of access road to proposed development of Cardiff for the Land Authority for Wales.
- **Cardiff Bay Barrage** Preparation of the Visual Impact Statement for inclusion in the Impact Statement for debate by parliament (UK) prior to the passing of the Cardiff Bay Barrage Bill.
- A470, CefnCoed to Pentrebach Preparation of landscape frameworks for the assessment of the impact of the proposed alignment on the landscape for The Welsh Office.
- **Sparkford to Illchester Bye Pass** The preparation of the landscape framework and the draft landscape plan for the Department of Transport.
- Green Island Reclamation Study Landscape and Visual Impact Assessment of building massing, Urban Design Guidelines and Masterplanning for a New Town extension to Hong Kong Island.
- **Route 3** Landscape and Visual Impact Assessment for alternative road alignments between Hong Kong Island and the Chinese Border.
- **China Border Link** Landscape and Visual Impact Assessment and initial Landscape Design for a new border crossing at Lok Ma Chau.
- **Route 81, Aberdeen Tunnel to Stanley** Landscape and Visual Impact Assessment for alternative highway alignments on the South side of Hong Kong Island.



DETAILS OF THE SPECIALIST, DECLARATION OF INTEREST AND UNDERTAKING UNDER OATH

	(For official use only)
File Reference Number:	
NEAS Reference Number:	DEA/EIA/
Date Received:	

Application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

#### PROJECT TITLE

Bushmanland PV Project, Northern Cape Province

#### Kindly note the following:

- 1. This form must always be used for applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting where this Department is the Competent Authority.
- 2. This form is current as of 01 September 2018. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at https://www.environment.gov.za/documents/forms.
- 3. A copy of this form containing original signatures must be appended to all Draft and Final Reports submitted to the department for consideration.
- 4. All documentation delivered to the physical address contained in this form must be delivered during the official Departmental Officer Hours which is visible on the Departmental gate.
- 5. All EIA related documents (includes application forms, reports or any EIA related submissions) that are faxed; emailed; delivered to Security or placed in the Departmental Tender Box will not be accepted, only hardcopy submissions are accepted.

#### **Departmental Details**

#### Postal address:

Department of Environmental Affairs

Attention: Chief Director: Integrated Environmental Authorisations

Private Bag X447

Pretoria 0001

#### Physical address:

Department of Environmental Affairs

Attention: Chief Director: Integrated Environmental Authorisations

Environment House 473 Steve Biko Road

Arcadia

Queries must be directed to the Directorate: Coordination, Strategic Planning and Support at:

Email: EIAAdmin@environment.gov.za

#### SPECIALIST INFORMATION

Specialist Company	Environmental Planning and Design				
Name:					
B-BBEE	Contribution level	4	Percent	tage	
	(indicate 1 to 8 or non-		Procure	ement	
	compliant)		recogni	tion	
Specialist name:	Jonathan Marshall	Jonathan Marshall			
Specialist Qualifications:	Dip LA				
Professional	Chartered Member of the Landscape Institute (UK).				
affiliation/registration:	Registered Professional Landscape Architect (South Africa).				
-	IAIA	_	•	,	
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#### 2. DECLARATION BY THE SPECIALIST

#### I, Jonathan Marshall, declare that -

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my
  possession that reasonably has or may have the potential of influencing any decision to be taken with
  respect to the application by the competent authority; and the objectivity of any report, plan or
  document to be prepared by myself for submission to the competent authority;
- all the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.

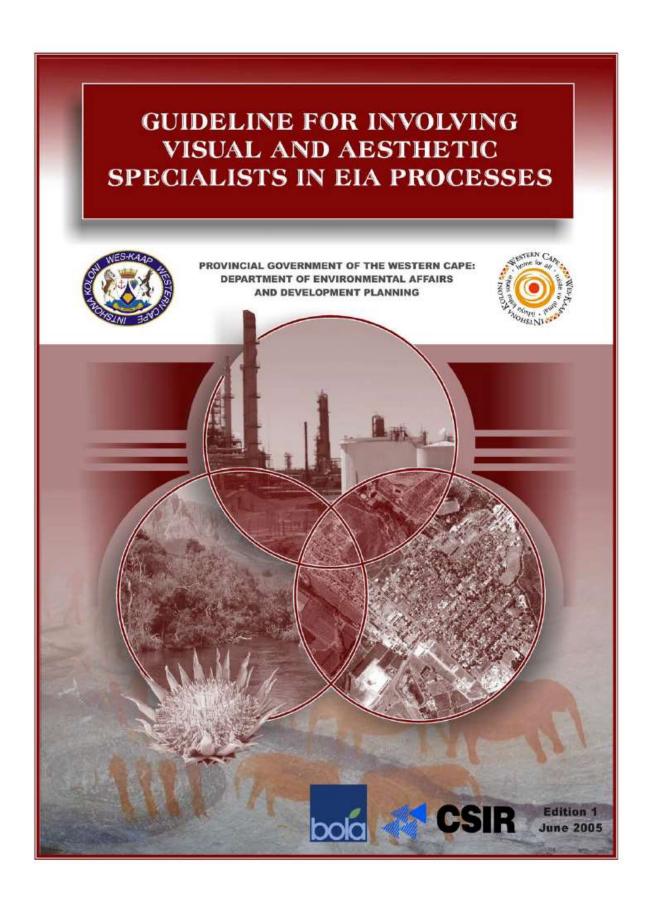
J. MOM.	
Signature of the Specialist	
Environmental Planning and Design	
Name of Company:	
11 <sup>th</sup> May 2020	

Date

#### **APPENDIX II**

# GUIDELINES FOR INVOLVING VISUAL AND AESTHETIC SPECIALISTS IN EIA PROCESSES

(Preface, Summary and Contents for full document go to the Provincial Government of the Western Cape, Department of Environmental Affairs and Development Planning web site, http://eadp.westerncape.gov.za/your-resource-library/policies-guidelines)



# GUIDELINE FOR INVOLVING VISUAL AND AESTHETIC SPECIALISTS IN EIA PROCESSES

#### Edition 1

#### Issued by:

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## **ACKNOWLEDGEMENTS**

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These guidelines were developed through a consultative process and have benefited from the inputs and comments provided by a wide range of individuals and organizations actively working to improve EIA practice. Thanks are due to all who took the time to engage in the guideline development process.

In particular, thanks are due to Jan Glazewski (University of Cape Town), Keith Wiseman (City of Cape Town), Paul Britton (SANPARKS), Graham Young (University of Pretoria), Lisa Parkes (Ninham Shand) and Paul Claassen (Environomics) for providing useful information and indepth comments.

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page i

### **PREFACE**

The purpose of an Environmental Impact Assessment (EIA) is to provide decision-makers (be they government authorities, the project proponent or financial institutions) with adequate and appropriate information about the potential positive and negative impacts of a proposed development and associated management actions in order to make an informed decision whether or not to approve, proceed with or finance the development.

For EIA processes to retain their role and usefulness in supporting decision-making, the involvement of specialists in EIA needs to be improved in order to:

- Add greater value to project planning and design;
- Adequately evaluate reasonable alternatives;
- Accurately predict and assess potential project benefits and negative impacts;
- Provide practical recommendations for avoiding or adequately managing negative impacts and enhancing benefits;
- Supply enough relevant information at the most appropriate stage of the EIA process to address adequately the key issues and concerns, and effectively inform decision-making in support of sustainable development.

It is important to note that not all EIA processes require specialist input; broadly speaking, specialist involvement is needed when the environment could be significantly affected by the proposed activity, where that environment is valued by or important to society, and/or where there is insufficient information to determine whether or not unavoidable impacts would be significant.

The purpose of this series of guidelines is to improve the efficiency, effectiveness and quality of specialist involvement in EIA processes. The guidelines aim to improve the capacity of roleplayers to anticipate, request, plan, review and discuss specialist involvement in EIA processes. Specifically, they aim to improve the capacity of EIA practitioners to draft appropriate terms of reference for specialist input and assist all roleplayers in evaluating whether or not specialist input to the EIA process is appropriate for the type of development and environmental context. Furthermore, they aim to ensure that specialist inputs support the development of effective, practical Environmental Management Plans where projects are authorised to proceed (refer to Guideline for Environmental Management Plans).

The guidelines draw on best practice in EIA in general, and within specialist fields of expertise in particular, to address the following issues related to the timing, scope and quality of specialist input. The terms "specialist involvement" and "input" have been used in preference to "specialist assessment" and "studies" to indicate that the scope of specialists' contribution (if required) depends on the nature of the project, the environmental context and the amount of available information and does not always entail detailed studies or assessment of impacts.

The guidelines draw on best practice in EIA in general, and within specialist fields of expertise in particular, to address the following issues related to the timing, scope and quality of specialist input. The terms "specialist involvement" and "input" have been used in preference to "specialist

DEA&DP GUIDELINE FOR INVOLVING VISUAL AND AESTHETIC SPECIALISTS IN EIA PROCESSES page~ii

assessment" and "studies" to indicate that the scope of specialists' contribution depends on the nature of the project, the environmental context and the amount of available information.

	ISSUES
TIMING	When should specialists be involved in the EIA process; i.e. at what stage in the EIA process should specialists be involved (if at all) and what triggers the need for their input?
SCOPE	<ul> <li>Which aspects must be addressed through specialist involvement; i.e. what is the purpose and scope of specialist involvement?</li> <li>What are appropriate approaches that specialists can employ?</li> <li>What qualifications, skills and experience are required?</li> </ul>
QUALITY	<ul> <li>What triggers the review of specialist studies by different roleplayers?</li> <li>What are the review criteria against which specialist inputs can be evaluated to ensure that they meet minimum requirements, are reasonable, objective and professionally sound?</li> </ul>

The following guidelines form part of this first series of guidelines for involving specialists in EIA processes:

- Guideline for determining the scope of specialist involvement in EIA processes
- Guideline for the review of specialist input in EIA processes
- Guideline for involving biodiversity specialists in EIA processes
- Guideline for involving hydrogeologists in EIA processes
- Guideline for involving visual and aesthetic specialists in EIA processes
- Guideline for involving heritage specialists in EIA processes
- · Guideline for involving economists in EIA processes

The Guideline for determining the scope of specialist involvement in EIA processes and the Guideline for the review of specialist input in EIA processes provide generic guidance applicable to any specialist input to the EIA process and clarify the roles and responsibilities of the different roleplayers involved in the scoping and review of specialist input. It is recommended that these two guidelines are read first to introduce the generic concepts underpinning the guidelines which are focused on specific specialist disciplines.

#### Who is the target audience for these guidelines?

The guidelines are directed at authorities, EIA practitioners, specialists, proponents, financial institutions and other interested and affected parties involved in EIA processes. Although the guidelines have been developed with specific reference to the Western Cape province of South Africa, their core elements are more widely applicable.

## What type of environmental assessment processes and developments are these guidelines applicable to?

The guidelines have been developed to support project-level EIA processes regardless of whether they are used during the early project planning phase to inform planning and design decisions (i.e. during pre-application planning) or as part of a legally defined EIA process to obtain statutory approval for a proposed project (i.e. during screening, scoping and/or impact assessment). Where specialist input may be required the guidelines promote early, focused and appropriate involvement of specialists in EIA processes in order to encourage proactive consideration of potentially significant impacts, so that negative impacts may be avoided or

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effectively managed and benefits enhanced through due consideration of alternatives and changes to the project.

The guidelines aim to be applicable to a range of types and scales of development, as well as different biophysical, social, economic and governance contexts.

#### What will these guidelines not do?

In order to retain their relevance in the context of changing legislation, the guidelines promote the principles of EIA best practice without being tied to specific legislated national or provincial EIA terms and requirements. They therefore do not clarify the specific administrative, procedural or reporting requirements and timeframes for applications to obtain statutory approval. They should, therefore, be read in conjunction with the applicable legislation, regulations and procedural guidelines to ensure that mandatory requirements are met.

It is widely recognized that no amount of theoretical information on how best to plan and coordinate specialist inputs, or to provide or review specialist input, can replace the value of practical experience of coordinating, being responsible for and/or reviewing specialist inputs. Only such experience can develop sound judgment on such issues as the level of detail needed or expected from specialists to inform decision-makers adequately. For this reason, the guidelines should not be viewed as prescriptive and inflexible documents. Their intention is to provide best practice guidance to improve the quality of specialist input.

Furthermore, the guidelines do not intend to create experts out of non-specialists. Although the guidelines outline broad approaches that are available to the specialist discipline (e.g. field survey, desktop review, consultation, modeling), specific methods (e.g. the type of model or sampling technique to be used) cannot be prescribed. The guidelines should therefore not be used indiscriminately without due consideration of the particular context and circumstances within which an EIA is undertaken, as this influences both the approach and the methods available and used by specialists.

#### How are these guidelines structured?

The specialist guidelines have been structured to make them user-friendly. They are divided into six parts, as follows:

- Part A: Background;
- Part B: Triggers and key issues potentially requiring specialist input;
- Part C: Planning and coordination of specialist inputs (drawing up terms of reference);
- Part D: Providing specialist input;
- · Part E: Review of specialist input; and
- Part F: References.

Part A provides grounding in the specialist subject matter for all users. It is expected that authorities and peer reviewers will make most use of Parts B and E; EIA practitioners and project proponents Parts B, C and E; specialists Part C and D; and other stakeholders Parts B, D and E. Part F gives useful sources of information for those who wish to explore the specialist topic.

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## **SUMMARY**

This guideline document, which deals with specialist visual input into the EIA process, is organised into a sequence of interleading sections. These follow a logical order covering the following:

- the background and context for specialist visual input;
- the triggers and issues that determine the need for visual input;
- the type of skills and scope of visual inputs required in the EIA process;
- the methodology, along with information and steps required for visual input;
- finally, the review or evaluation of the visual assessment process.

Part A is concerned with defining the visual and aesthetic component of the environment, and with principles and concepts relating to the visual assessment process. The importance of the process being logical, holistic, transparent and consistent is stressed in order for the input to be useful and credible.

The legal and planning context within which visual assessments take place indicate that there are already a number of laws and bylaws that protect visual and scenic resources. These resources within the Western Cape context have importance for the economy of the region, along with the proclaimed World Heritage Sites in the Province.

The role and timing of specialist visual inputs into the EIA process are outlined, with the emphasis being on timely, and on appropriate level of input, from the early planning stage of a project, through to detailed mitigation measures and

management controls at the implementation stage.

**Part B** deals with typical factors that trigger the need for specialist visual input to a particular project. These factors typically relate to:

- (a) the nature of the receiving environment, in particular its visual sensitivity or protection status;
- (b) the nature of the project, in particular the scale or intensity of the project, which would result in change to the landscape or townscape.

The correlation between these two aspects are shown in a table, in order to determine the varying levels of visual impact that can be expected, i.e. from little or no impact, to very high visual impact potential.

Part C deals with the choice of an appropriate visual specialist, and the preparation of the terms of reference (TOR) for the visual input. Three types of visual assessment are put forward, each requiring different expertise, namely:

Type A: assessments involving large areas of natural or rural landscape;

Type B: assessments involving local areas of mainly built environment;

Type C: assessments involving smaller scale sites with buildings, or groups of buildings.

The scope of the visual input would in summary relate to the following:

- the issues raised during the scoping process;
- the time and space boundaries, i.e. the extent or zone of visual influence;

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- the types of development alternatives that are to be considered;
- the variables and scenarios that could affect the visual assessment;
- the inclusion of direct, indirect and cumulative effects.

Approaches to the visual input relate to the level of potential impact and range from minimal specialist input, to a full visual impact assessment (VIA). A list of the typical components of a visual assessment is given, and the integration with other studies forming part of the EIA process is discussed.

Part D provides guidance for specialist visual input, and on the information required by specialists. Notes on predicting potential visual impacts are given, along with suggested criteria for describing and rating visual impacts. The assessment of the overall significance of impacts, as well as thresholds of significance are discussed.

Further aspects that need to be considered by visual specialists in EIA processes include:

- affected parties who stand to benefit or lose
- risks and uncertainties related to the project
- assumptions that have been made, and their justification,
- levels of confidence in providing the visual input or assessment.
- management actions that can be employed to avoid or mitigate adverse effects and enhance benefits, and
- the best practicable environental option from the perspective of the visual issues and impacts.

Finally, pointers for the effective communication of the findings are given.

**Part E** lists specific evaluation criteria for reviewing visual input by a specialist, where this becomes necessary. Further guidance on this is given in the document on *Guideline for the review of specialist input in EIA processes*.

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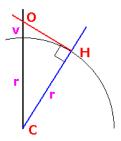
#### **APPENDIX III**

#### FORMULA FOR DERIVING THE APPROXIMATE VISUAL HORIZON

#### The Mathematics behind this Calculation

This calculation should be taken as a guide only as it assumes the earth is a perfect ball 6378137 metres radius. It also assumes the horizon you are looking at is at sea level. A triangle is formed with the centre of the earth (C) as one point, the horizon point (H) is a right angle and the observer (O) the third corner. Using Pythagoras's theorem we can calculate the distance from the observer to the horizon (OH) knowing CH is the earth's radius (r) and CO is the earth's radius (r) plus observer's height (v) above sea level.

Sitting in a hotel room 10m above sea level a boat on the horizon will be 11.3km away. The reverse is also true, whilst rowing across the Atlantic, the very top of a mountain range 400m high could be seen on your horizon at a distance of 71.4 km assuming the air was clear enough.



#### **APPENDIX IV**

#### **GLARE ASSESSMENT**

#### **GLARE ANALYSIS - FIXED ARRAY**



# ForgeSolar GlareGauge Glare Analysis Results

## Site Configuration: Project 1 - 2-temp-0-temp-5

Project site configuration details and results.



Created April 1, 2020 10:45
a.m.
Updated April 1, 2020 10:47
a.m.
DNI varies and peaks at
1,000.0 W/m^2
Analyze every 1 minute(s)
0.5 ocular transmission
coefficient
0.002 m pupil diameter
0.017 m eye focal length
9.3 mrad sun subtended angle
Timezone UTC2
Site Configuration ID:
37384.6718

## Summary of Results Glare with low potential for temporary after-image

#### predicted

PV name	Tilt	Orientation	"Green" Glare	"Yellow" Glare	Energy Produced
	deg	deg	min	min	kWh
PV 1	45.0	0.0	85	0	229,400,000.0

## Component Data

PV Array(s)

Warning: This PV array encompasses a large surface area. This may reduce the accuracy of certain calculations if receptors are near the array. These calculations utilize the PV footprint centroid, rather than the glare-spot location, due to analysis method limitations. Additional analyses of array sub-sections may provide more information on expected glare. (Note that the subtended source angle is limited by the footprint surface area.)

×

Name: PV 1

Description: FIXED ARRAY Axis tracking: Fixed (no rotation)

T≹t: 45.0 deg Orientation: 0.0 deg Rated power: 100000.0 kW Panel material: Smooth glass without AR coating Vary reflectivity with sun

position? Yes

Correlate slope error with surface

type? Yes

Slope error: 5.55 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	m	m	m
1	-28.641501	21,044367	790,86	3,50	794.36
2	-28,641652	21,046685	791.15	3.50	794,65
3	-28.638940	21.052264	796,90	3,50	800.40
4	-28,634721	21.051749	795.11	3.50	798.61
5	-28,632989	21.050461	795.82	3.50	799.32
6	-28.631331	21,049260	796.79	3.50	800.29
7	-28.628996	21.046685	798.55	3.50	802.05
8	-28,626660	21.044196	799,32	3.50	802.82
9	-28.625530	21.039217	806.36	3,50	809.86
10	-28,625530	21,031836	818.27	3.50	821.77
11	-28.630051	21.031836	816.24	3.50	819.74
12	-28,634495	21,036814	807.90	3,50	811,40

## 2-Mile Flight Path Receptor(s)

Name: MAIN RUNWAY

Description:

Threshold height: 15 m. Direction: 156.2 deg Glide slope: 3.0 deg Pilot view restricted? Yes Vertical view restriction: 30,0 deg Azimuthal view restriction: 50.0

deg



Point	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	m	m	m
Threshold	-28.377898	21.251336	850.14	15.24	865.38
2-mile point	-28.351434	21.238086	859-82	174.25	1034.07

Name: SECONDARY RUNWAY

Description:

Threshold height: 15 m Direction: 174.1 deg Glide slope: 3.0 deg Pilot view restricted? Yes Vertical view restriction: 30.0 deg Azimuthal view restriction: 50.0 deg

		Vii n	A
W.		N	
	9	1	

Point	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	m	m	m
Threshold	-28.391188	21.256143	851.67	15.24	866.91
2-mile point	-28.362427	21.252778	848.40	187.20	1035.59

## Route Receptor(s)

Name: Route 1 Route type Two-way View angle: 50.0 deg



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	m	m	m
1	-28.641878	21.051319	793.87	1.50	795.37
2	-28.640145	21,054238	795,89	1.50	797.39
3	-28.638187	21.057413	789.70	1.50	791.20
4	-28,636831	21.059817	785.41	1.50	786,91
5	-28.635550	21.061705	781.89	1.50	783.39
6	-28.634646	21.063078	779,69	1.50	781.19
7	-28.633667	21.064709	782.90	1.50	784.40
8	-28.632989	21.065997	784.37	1.50	785.87
9	-28.631708	21.067971	786.59	1.50	788.09
10	-28,630879	21.069344	785.81	1.50	787.31
11	-28.629749	21.070803	786.23	1.50	787.73
12	-28.629071	21.072005	787.07	1.50	788.57
13	-28,625681	21,075810	784.42	1.50	785,92
14	-28.623948	21,077155	786,11	1,50	787.61

## **PV Array Results**

## PV 1 low potential for temporary after-image

Warning: This PV array encompasses a large surface area. This may reduce the accuracy of certain calculations if receptors are near the array. These calculations utilize the PV footprint centroid, rather than the glare-spot location, due to analysis method limitations. Additional analyses of array sub-sections may provide more information on expected glare. (Note that the subtended source angle is limited by the footprint surface area.)

Predicted energy output: 229,400,000.0 kWh (assuming sunny, clear skies)

Component	Green glare (min)	Yellow glare (min)
FP: MAIN RUNWAY	0	0
FP: SECONDARY RUNWAY	85	0
Route: Route 1	0	0

## PV 1 - Receptor (MAIN RUNWAY)

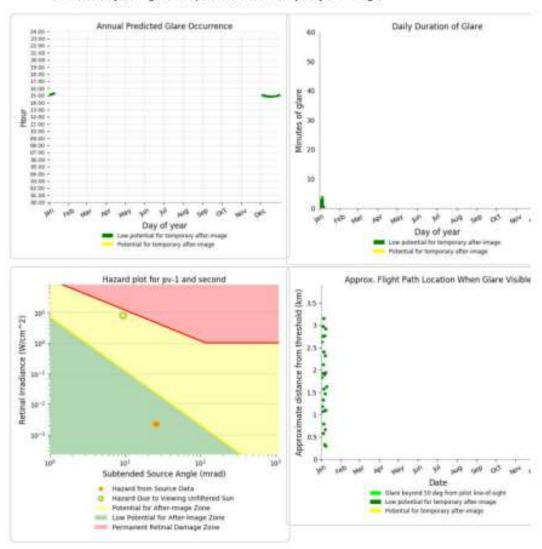
No glare found

×

#### PV 1 - Receptor (SECONDARY RUNWAY)

PV array is expected to produce the following glare for observers on this flight path:

- · 85 minutes of "green" glare with low potential to cause temporary after-image.
- 0 minutes of "yellow" glare with potential to cause temporary after-image.



#### PV 1 - Route Receptor (Route 1)

No glare found

#### **GLARE ANALYSIS - SINGLE AXIS TRACKING ARRAY**



## Site Configuration: pv1 tracking

Project site configuration details and results.



Created March 30, 2020 8:52
a,m.
Updated March 30, 2020
8:53 a,m.
DNI varies and peaks at
1,000.0 W/m^2
Analyze every 1 minute(s)
0.5 ocular transmission
coefficient
0.002 m pupil diameter
0.017 m eye focal length
9.3 mrad sun subtended
angle
Timezone UTC2
Site Configuration ID:
37286.6718

## Summary of Results No glare predicted!

PV name	Tilt	Orientation	"Green" Glare	"Yellow" Glare	Energy Produced
	deg	deg	min	min	kWh
PV 1	SA tracking	SA tracking	0	0	251,300,000.0

## **Component Data**

PV Array(s)

Warning: This PV array encompasses a large surface area. This may reduce the accuracy of certain calculations if receptors are near the array. These calculations utilize the PV footprint centroid, rather than the glare-spot location, due to analysis method limitations. Additional analyses of array sub-sections may provide more information on expected glare. (Note that the subtended source angle is limited by the footprint surface area.)

Name: PV 1 Description: Single axis tracking Axis tracking: Single-axis rotation Tracking axis orientation: 0,0 dog Tracking axis tilt: 0.0 deg Tracking axis panel offset: 0,0 deg Maximum tracking angle: 60.0 deg Resting angle: 0.0 deg Rated power: 100000,0 kW Panel material: Smooth glass without AR coating Vary reflectivity with sun position? Yes-Correlate slope error with auriece type? Yes Slope error: 6,55 mrad

Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	m	m	m
1	-28,641501	21,044367	790.86	3.00	793.86
2	-28.641652	21.046685	791.15	3.00	794.15
3	-28,638940	21,052264	796,90	3.00	799,90
4	-28,634721	21,051749	795.11	3.00	798.11
5	-28.632989	21.050461	795.82	3.00	798.82
6	-28,631331	21,049260	796,79	3.00	799,79
7	-28.628996	21.046685	798.55	3,00	801,55
В	-28,626660	21.044196	799.32	3.00	802,32
9	-28,625530	21,038217	805,36	3.00	609,38
10	-28,625830	21.031836	818.27	3,00	821,27
11	-28.630051	21,031836	816.24	3.00	819.24
12	-28,634495	21,036614	807,90	3,00	610,90

×



#### 2-Mile Flight Path Receptor(s)

Name: MAIN RUNWAY
Description:
Threshold height: 15 m
Direction: 156,2 deg
Glide slope: 3.0 deg
Pilot view restricted? Yes
Vertical view restriction: 30.0 deg
Azimuthal view restriction: 50.0

Point	Latitude	Longitude	Ground elevation	Height above ground	Total elevatio
	deg	deg	-	m	m
Threshold	-28.377898	21.251336	850.14	15.24	865.38
2-mile point	-28,351434	21,238086	859,82	174,25	1034.0



Name: SECONDARY RUNWAY

Description:

deg

Threshold height: 15 m Direction: 174.1 deg Glide slope: 3.0 deg Pilot view restricted? Yes Vertical view restriction: 30.0 deg Azimuthal view restriction: 50.0

Point	Latitude	Longitude	Ground elevation	Height above ground	Total elevatic
	deg	dog	100	m	m
Threshold	-28-391188	21.256143	851.67	15.24	866.91
2-mle point	-28,362427	21,252778	848,40	187,20	1035.5



## Route Receptor(s)

Name: Route 1 Route type Two-way View angle: 50,0 deg



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	20%	m	m
1	-28,644890	21,046745	782,92	1.50	784,42
2	-28,642291	21.051165	791.93	1.50	793,43
3	-28.639805	21,054985	795.75	1.50	797.25
4	-28.638035	21.057989	788-39	1.50	789-89
5	-28,635813	21,001508	782.83	1.50	784,33
6	-28.633967	21,064383	782.17	1.50	783,67
7	-28.632310	21.087130	785.16	1.50	786.66
8	-28,630328	21,070211	785,39	1.50	786,89
9	-28.628897	21,072400	786.60	1,50	788.10
10	-28.627089	21.074202	785.72	1.50	787.22
11	-28,624904	21.076219	783,53	1.50	785,03
12	-29.622832	21.078322	787.99	1.50	789,49
13	-28.619969	21.081155	791.45	1.50	792.95
14	-28,617709	21,083300	789,75	1,50	791.25

## PV Array Results

#### PV 1

Warning: This PV array encompasses a large surface area. This may reduce the accuracy of certain calculations if receptors are near the array. These calculations utilize the PV footprint centroid, rather than the glare-spot location, due to analysis method limitations. Additional analyses of array sub-sections may provide more information on expected glare. (Note that the subtended source angle is limited by the footprint surface area.)

Predicted energy output: 251,300,000.0 kWh (assuming sunny, dear skies)

Component	Green glare (min)	Yellow glare (min)
FP: MAIN RUNWAY	0	0
FP: SECONDARY RUNWAY	0	0
Route: Route 1	0	0

#### Assumptions

- Times associated with glare are denoted in Standard time. For Daylight Savings, add one hour.
- Glare analyses do not account for physical obstructions between reflectors and receptors. This
  includes buildings, tree cover and geographic obstructions.
- Detailed system geometry is not rigorously simulated.
- The glare hazard determination relies on several approximations including observer eye
  characteristics, angle of view, and typical blink response time. Actual values and results may vary.
- Several calculations utilize the PV array centroid, rather than the actual glare spot location, due to algorithm limitations. This may affect results for large PV footprints. Additional analyses of array subsections can provide additional information on expected glare.
- The subtended source angle (glare spot size) is constrained by the PV array footprint size. Partitioning
  large arrays into smaller sections will reduce the maximum potential subtended angle, potentially
  impacting results if actual glare spots are larger than the sub-array size. Additional analyses of the
  combined area of adjacent sub-arrays can provide more information on potential glare hazards. (See
  previous point on related limitations.)
- Hazard zone boundaries shown in the Glare Hazard plot are an approximation and visual aid. Actual
  ocular impact outcomes encompass a continuous, not discrete, spectrum.
- Glare locations displayed on receptor plots are approximate. Actual glare-spot locations may differ.
- Glare vector plots are simplified representations of analysis data. Actual glare emanations and results may differ.
- Refer to the Help page for assumptions and limitations not listed here.

#### **APPENDIX V**

## **CUMULATIVE IMPACT ASSESSMENT**

#### 1 Landscape Change

#### Nature:

The proposed project will extend the general influence of development and specifically solar projects within the area.

The project is one of seven proposed solar PV projects on the same property.

Currently within a 30km radius of the proposed project property there are fourteen other properties on which renewable energy projects are proposed. These consist of both Concentrated Solar Projects (CSP) as well as Solar Photovoltaic projects (PV).

There is one existing CSP project approximately 10km to the north east of the project site (Khi Solar 1).

There are also ten proposed and authorised PV projects on the Farms McTaggarts, Klip Punt and Tungsten Lodge RE/638 which are located directly to the north west and south east of Khi Solar 1. A number of these projects were under construction at the time of reporting.

The number of renewable energy projects in the vicinity of the proposed project has resulted in the development of both strategic high voltage electrical infrastructure including the Upington MTS as well as power line connections to individual renewable energy projects.

The proposed project will therefore not extend the visual influence of industry, it will however intensify if within a relatively small area.

Whilst A detailed visual analysis of all other solar projects in the area has not been undertaken, the combined effect of all proposed solar projects could be significant. Because the proposed project will affect an area within which there is already significant industrial influence, it is only likely to have a relatively small contribution to landscape change.

As the impact of the proposed project on the Orange River Corridor is minimal and because it is more difficult to predict the impact of other projects on this area without undertaking a detailed analysis, only the impact of projects on the Plateau LCA is considered.

	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Site and surroundings (2)	Region(3)
Duration	Long term (4)	Long term (4)
Magnitude	Minor(2)	High <b>(8)</b>
Probability	Probable (3)	Probable (3)
Significance	Low (24)	Medium (45)
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	No	No

#### 2 Character of the landscape as seen from the N14.

#### Nature:

The ZTV analysis indicates that views of the proposed PV array and the substation will be limited to a short section of approximately 5km of this road at a distance of approximately 0.2km.

If visible, the proposed project will also be viewed in the context of the Khi Solar 1 project as well as a number of other solar PV projects.

Without mitigation, it is likely therefore that the subject project will be obvious from this road.

With mitigation however, the project is likely to be largely screened.

The assessment without mitigation is indicated below. With mitigation, the contribution to cumulative impacts reduces to low.

	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Site and immediate surroundings (2)	Region, (3)
Duration	Long term(4)	Long term, (4)
Magnitude	Low <b>(4)</b>	Moderate to low, (5)
Probability	Highly probable (4)	Probable, <b>(5)</b>
Significance	Medium(40)	Medium,(60)
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of	No	No
resources?		
Can impacts be mitigated?	Yes	Unknown

#### 3 Changein the character of the landscape as seen from the R359.

#### Nature:

The ZTV analysis indicates that the proposed project could be visible intermittently to sections of this road at a distance in excess of 5km. Given the distance and the extent of vegetation on the edge of the Orange River Valley, the proposed project is unlikely to be highly obvious from this road.

The proposed project is largely screened from the road by vegetation. Other solar PV projects are also likely to be largely screened from the road.

It is unlikely therefore that the subject project will be obvious from this road, its influence on this cumulative impact is therefore likely to be relatively low.

	proposed project	Cumulative impact of the project and other projects in the area
Extent	Site and immediate	Regional(3)
	surroundings (2)	
Duration	Long term(4)	Long term, (4)
Magnitude	Minor (2)	Minor to Low, (3)

Probability	Improbable(2)	Probable, (3)
Significance	Low <b>(16)</b>	Medium (30)
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	No irreplaceable loss.	No

## 4 Changein the character of the landscape as seen from the Lutzputs Road.

#### Nature:

The proposed development will not be visually obvious from this road. **It will therefore not contribute to cumulative impacts.** 

#### 5 Cumulative impact on local settlements and homesteads

#### Nature:

Because the majority of homesteads are located within the Orange River Valley and are likely to be at least partially screened from PV projects to the north by landform and vegetation their cumulative visual impact is also anticipated to be low.

The Solar CSP Power Tower projects such as the Khi Solar 1 project are likely to be obvious however.

The cumulative impact of PV projects is therefore likely to have a low significance. The proposed project is assessed as having a low contribution to this impact.

	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Site and immediate surroundings (2)	Region(3)
Duration	Long term (4)	Long term(4)
Magnitude	Minor (2)	Minor(2)
Probability	Improbable(2)	Probable (3)
Significance	Low(16)	Low <b>(27)</b>
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	No irreplaceable loss	No irreplaceable loss

#### 6 Cumulative impact of glare affecting local receptors.

A/- 4		
Nature:		

The assessment has shown that neither a fixed or a single tracking configuration will cause glare to affect motorists on the adjacent N14. It is possible however that a fixed array could cause low levels of glare to affect pilots on their approach to the secondary (shorter) runway at Upington Airport. However, this glare is unlikely to result in an after image that might result in temporary vision problems for pilots. The proposed project will not create glare that will affect local receptors. It will therefore not contribute to cumulative impacts.

It is possible that other solar PV projects could create glare that affects local receptors. However, the majority of solar projects are set back more than 2km from the N14 and are some distance from the Upington Airport. It is therefore unlikely that glare arising from solar PV projects will create a large impact.

The assessment below does not include mitigation(adoption of a tracking configuration). Should this be adopted there will be no contribution to cumulative affects.

	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Region(3)	Region (3)
Duration	Long term (4)	Long term (4)
Magnitude	Minor(2)	Minor(2)
Probability	Probable(3)	Probable(3)
Significance	Low(27)	Low <b>(27)</b>
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	No irreplaceable loss.	No irreplaceable loss.

#### 7 Night Time Lighting Impacts

#### Nature:

Currently lighting in the area is arises from the settlement areas and homesteads within the Orange River Valley and traffic on the N14. There is also a background lighting level from the urban area of Upington

There is a risk that the proposed project will extend the influence of lighting however with appropriate mitigation lighting levels are anticipated to be low and in keeping with the current lighting pattern.

It is likely that the development of other solar projects in the area will increase lighting levels. However, with appropriate mitigation it is anticipated that this also will produce a low level of impact that is also in keeping with surrounding lighting levels.

	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Site <b>(1)</b>	Regional(3)
Duration	Long term (4)	Long term (4)
Magnitude	Small to minor (1)	Small to minor (1)
Probability	Improbable (2)	Improbable(3)
Significance	Low <b>(12)</b>	Low (24)

Status (positive or negative)	If the lights are generally not visible then the occasional light is unlikely to be seen as negative.  Neutral	Neutral
Reversibility	High	High
Irreplaceable loss of resources?	No irreplaceable loss	No irreplaceable loss

# APPENDIX VI ENVIRONMENTAL MANAGEMENT PLAN

Project component/s	Bushmanland PV, Construction, Operation and Decommissioning			
Potential Impact	<ul> <li>Change in Landscape Character and the nature of stakeholder views:</li> <li>Extending the influence of development into relatively natural areas;</li> <li>Changing the nature of views from the N14 and the R359;</li> <li>Extending lighting impacts into natural areas that are currently dark during the hours of darkness; and</li> </ul>			
Activity/risk source	<ul> <li>The proposed array and substation are highly obvious from the N14 and visible from local homesteads to the south;</li> <li>Engineered change in landform being obvious against natural contours;</li> <li>Vegetation clearance and lack of rehabilitation during construction and decommissioning making the development more obvious particularly from a distance;</li> <li>The development industrialising the outlook for stakeholders; and</li> <li>Lighting extending into natural areas that are currently dark during the hours of darkness;</li> </ul>			
Mitigation: Target/Objective	<ul> <li>Develop screen fence in order that views of structures are largely screened from the N14 and areas to the south;</li> <li>Plan platforms and earthworks to blend into surrounding natural contours.</li> <li>Minimise and reinstate vegetation loss.</li> <li>Maintain and augment exiting surrounding natural vegetation in order to soften views of the development and maintain continuity with the surrounding natural landscape.</li> <li>Remove structures and rehabilitate site to its natural condition on decommissioning.</li> <li>Ensure PV panels use non reflective surfaces in order to minimise the potential for glint and glare.</li> </ul>			
Mitigation: Action/c	ontrol	Responsibility Contractor (C) Environmental Officer (EO) Environmental Liaison Officer (ELO)	Timeframe Construction Phase (C) Operational Phase (O) Decommissioning Phase (D)	
Develop screening to minimise the visibility		C FO	C	

	Contractor (C) Environmental Officer (EO) Environmental Liaison Officer (ELO)	Construction Phase (C) Operational Phase (O) Decommissioning Phase (D)
Develop screening to minimise the visibility of the panels from areas to the south.  Minimise disturbance and maintain existing	C, EO	С
vegetation as far as is possible both within and surrounding the development area.	C, EO	С
Reinstate any areas of vegetation that have been disturbed during construction.	C, EO	C

Maintain and augment vegetation within the area surrounding the development.		C, EO	D
Rehabilitate disturbed areas to their natural state on decommissioning.		C, EO	C, D
Monitor rehabilitated areas post-construction and post-decommissioning and implement remedial actions.		C, EO	D
Remove all temporary works.		C, EO	D
Remove infrastructure not required for the post-decommissioning use of the site.		C, EO	D
Performance Indicators	Visibility of the PV array from the N14 and areas to the south.  Natural contours rather than rigid engineered land form.  Vegetation presence and density.  Visibility of the development from surrounding areas.  Presence of unnecessary infrastructure.		
Monitoring	Evaluate visibility from the N14.  Evaluate vegetation before, during and after construction.  Evaluate vegetation growth and reinstatement during decommissioning and for a year thereafter.  Take regular time-line photographic evidence.  Responsibility: EO and ELO.  Prepare regular reports.		