

16 October 2022

South Africa Mainstream Renewable Power Droogfontein PV3 (Pty) Ltd
PO Box 45063,
CLAREMONT,
7735

ATTENTION: Eugene Marais

Dear Sir,

VISUAL SPECIALIST COMMENT IN RESPECT OF PROPOSED AMENDMENTS TO THE ENVIRONMENTAL AUTHORISATION FOR THE 75MW DROOGFONTEIN 3 PHOTOVOLTAIC (PV) PLANT NEAR KIMBERLEY, NORTHERN CAPE PROVINCE

1. INTRODUCTION

South Africa Mainstream Renewable Power Droogfontein PV3 (Pty) Ltd (hereafter referred to as “Mainstream”), received Environmental Authorisation (EA) for the proposed construction of the 75MW Droogfontein 3 Photovoltaic (PV) Solar Energy Facility (SEF), near Kimberley in the Northern Cape Province. Authorisation was originally granted on 7 September 2012 by way of **EA Reference No 12/12/20/2024/1/1** and several amendments to this EA have been granted in the intervening years. As this EA will lapse in September 2022, Mainstream is proposing to submit a Part 1 EA amendment to extend the EA validity period.

A Visual Impact Assessment (VIA) was undertaken in respect of this project by SiVEST in June 2011 as part of the original Environmental Impact Assessment (EIA) process and the findings of the VIA were presented in the Visual Impact Assessment Report – EIA Phase, dated 3 June 2011 (Gibb, 2011).

SiVEST has appointed SLR Consulting South Africa (Pty) Ltd (hereafter referred to as “SLR”) to provide visual specialist comment in respect of proposed amendments.



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The findings of the original VIA are still considered to be valid and form the basis of the comments presented hereunder. As such, this letter must be read in conjunction with the VIA report dated 3 June 2011.

2. PROJECT DESCRIPTION

As stated, Mainstream was issued with an Environmental Authorisation (EA) for the proposed 75MW Droogfontein 3 Solar Energy Facility (SEF), located near Kimberley in the Sol Plaatje Local Municipality, Frances Baard District Municipality in the Northern Cape Province of South Africa on 7th of September 2012 (DEFF Reference No.: 12/12/20/2024/1/1).

Subsequent to the issuing of the original EA in September 2012, the following amendments have been undertaken and granted for the authorised SEF:

- The EA was amended on 19 of June 2015 to extend the validity period of the EA and to change the contact details of the EA holder (DFFE Reference No.: 12/12/20/2024/1/1/AM2).
- The EA was amended on 11 August 2017 in order to extend the validity of the EA (DFFE Reference No.: 12/12/20/2024/1/1AM3).
- The EA was amended on 02 September 2020 in order to extend the validity of the EA (DFFE Reference No.: 12/12/20/2024/1/1AM4).

The Droogfontein Photovoltaic (PV) Solar Energy Facility is to be constructed within the project site which comprises the following farm portion:

- Portion 1 of the farm Droogfontein No. 62

The following infrastructure has been authorised by the DFFE:

- Photovoltaic (PV) panels array with a maximum 320 000 panels
- Concrete or screw pile foundations used to support the panel arrays
- The panel arrays (between 5m and 10m high) footprint of approximately 15m x 4m in area
- A single storey building with warehouse / workshop space & access (eg. 8m high, 20m long, 20m wide)
- The distribution substation of approximately 90m x 120m in size and inverters between 75 and 93
- An access road with a gravel surface from the public road onto the site
- A 5m high permanent solar resource measuring station which will measure 100m² to measure incoming solar radiation levels on site.
- A lay down area of maximum of 10000m² adjacent to the site or access route and a contractors site offices which will require a maximum of 5000m²

Mainstream is now proposing to undertake a Part 1 EA Amendment process to extend the validity of the Environmental Authorisation by an additional 3 years.

3. SPECIALIST COMMENT

In considering the proposed amendment to the EA for the Droogfontein 3 SEF, it is noted that the amendment does not involve any changes in the PV layout or the positioning of the other authorised elements of the facility. Given the fact that the VIA for the Droogfontein 3 SEF was undertaken in 2011 however, it is important to assess the degree of change in the receiving environment in the intervening years to determine whether the development as proposed will result in additional visual impacts or exacerbate the impacts previously identified.

3.1 CHANGES IN THE RECEIVING ENVIRONMENT

A desktop assessment was undertaken using Google Earth Imagery. From this assessment, it was established that although the landscape immediately east of Droogfontein 3 SEF development area, and also to the south-east, has undergone some transformation as a result of the development of Solar PV facilities, there has been little significant

change in the baseline characteristics or in the number of sensitive receptors across the remainder of the Droogfontein 3 SEF VIA study area since 2011.

3.2 CUMULATIVE IMPACTS

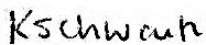
The previous VIA considered other existing and proposed renewable energy in close proximity to the Droogfontein 3 SEF and according to the DFFE's Renewable Energy EIA Application Database for SA (incremental release Quarter 2 2022), there have been very few EAs granted in respect of new REF developments in the area (Figure 1). There has however been some change in the status of two of the approved projects in the interim. Droogfontein PV1 and PV2 have been constructed in close proximity to Droogfontein 3 and both of these SEFs are in operation. Hence the landscape has already undergone noticeable change. The development of the Droogfontein 3 SEF directly adjacent to Droogfontein PV2 could therefore be seen an extension of the existing SEF, rather than the creation of a new development in an otherwise "unaltered" landscape.

Accordingly, the overall significance of the cumulative impacts is not expected to increase and these impacts could be mitigated to acceptable levels with the implementation of the relevant mitigation measures.

4. CONCLUSION

It is concluded that the proposed changes to the EA are considered to be purely administrative and will not give rise to additional visual impacts or exacerbate the impacts previously identified in the VIA for this development. Furthermore, no additional recommendations or mitigation measures will be required and all of the mitigation measures set out in the original VIA remain valid.

Yours faithfully



Kerry Schwartz
Visual Specialist



Liandra Scott-Shaw
Reviewer

