

Comments & Responses Report

Mercury Cluster: Ratpan Solar PV1

Comment received during the Initial Advertising Period

A Background Information Document (BID) was distributed to all IAPs and a 30-day commenting period (31 March – 30 April 2022) applied.

South Africa Heritage Resource Agency: APM Assistant: Sityhilelo Ngcatsha

1. Archaeological sites spanning the Earlier, Middle and Later Stone Age have been found in the region despite the extensive agricultural transformation. Burial grounds were identified within the broader region, therefore, an archaeological field survey is recommended. The archaeological component of the HIA should follow the SAHRA 2007 Minimum Standards: Archaeological Component of Impact Assessment Report.
2. Given the identification of palaeontological sites near part of the study area and the indicators of fossil sensitivity identified during the Screening assessment, it is recommended that a palaeontologist conduct a field survey of the proposed solar PV areas. The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.
3. Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.
4. The NEMA EIA documents and appendices must be submitted at the start of the public review periods in order for an informed comment to be issued that can be incorporated into the final reports for submission to the competent authority.

Response from Landscape Dynamics

1. An archaeological field survey was undertaken and is discussed under Chapter 6 of this report and attached under Appendix F. Only one site of heritage importance was found on site and should be protected. Note that this site is situated within the demarcated wetland area and is excluded from development. No further mitigation is required.
2. A Palaeontology desktop assessment was undertaken and it concluded that the palaeontological heritage is extremely low and mitigation is not proposed.
3. A comprehensive HIA was undertaken and it concluded that no heritage, archaeological or palaeontological findings that require specific mitigation was identified and the project should, from a heritage perspective, proceed.
4. All NEMA documents will be submitted to SAHRA for their comment and record keeping as part of the public participation programme.

Department of Water & Sanitation: Office of the provincial head: Pule Joseph Lenong

1. The DWS confirmed receipt of the BID document and stated that it is receiving attention.

Response from Landscape Dynamics

1. No further comment from DWS was received.

Department of Police, Roads & Transport: Assistant Director Land Acquisition: Mr Hannes Maree and Directorate Road Asset Management Systems: Mr JPW Maree

1. The following provincial roads are being affected:
 - Vlakfontein Solar PV1
 - Secondary road S643 (statutory road reserve width of 25m)
 - Tertiary road T3762 (statutory road reserve width of 16m)
 - Kleinfontein Solar PV1
 - Tertiary roads T3762 and T4388 (statutory road reserve width of 16m)
 - Zaaiplaats Solar PV1
 - Secondary road S729 (statutory road reserve width of 25m)
 - Hormah Solar PV1
 - Primary road P15/2 (statutory road reserve width of 32m)
 - Secondary road S1294 (statutory road reserve width of 25m)
 - Ratpan Solar PV1
 - Primary road P15/2 (statutory road reserve width of 32m)
 - Secondary road S1294 (statutory road reserve width of 25m)
2. The Department supports the above-mentioned development subject to the following conditions:
 - 2.1 No structures may be erected within 95m, measured from the centre line of the provincial road without written approval for the relaxation of the building line (structures include any overhead power line that will be erected parallel with or across the alignment of a provincial road).
 - 2.2 The Department will only be able to consider and approve any specific access/es on receipt of a completed application and drawing that shows the geometric layout and exact locality of the access/es. An application form was attached. The application for access can be considered once a formal application has been submitted.
 - 2.3 The condition of the provincial gravel roads (secondary roads S642, S643, S729, S1294 and tertiary roads T3762 and T4388) is not in a good condition. The increase in traffic

during the construction phase will require more intense routine maintenance and certain sections will have to be re-gravelled. Mulilo Renewable Project Developments (Pty) Ltd will therefore be required to carry out such maintenance at their expenditure.

- 2.4 No provincial borrow pits may be utilised for construction of the development. The Department must be contacted to indicate the positions of the provincial borrow pits (there are no provincial borrow pits and on the properties affected by the Mercury Solar PV Cluster).
- 2.5 Applications for wayleave for any other operations, such as power lines, within the 95m measured from the centre line of the provincial roads, must be submitted on the similar application form as attached to their comment.

Response from Landscape Dynamics

- All of the above-mentioned conditions were included in the EMPr.

SOLA Group: Jnr Project Developer Ms Abigail Forbes

Ms Forbes requested to be registered as a stakeholder for the Mulilo Mercury Cluster PV Projects on the basis that SOLA is developing similar projects in the area. A kml of the development proposal was requested.

Response from Landscape Dynamics

- Ms Forbes was added to the IAP register and the requested kml files were emailed.
- No further comment was received

Environamics: Senior EAP: Ms Lisa Opperman

1. Ms Opperman requested to be registered as an IAP since they are the EAPs for the Phofu Solar Power Plant, which is just south of the proposed directly adjacent Ratpan PV1 facility.
2. The project information and access to any reports which have been released to the public to date were requested.

Response from Landscape Dynamics

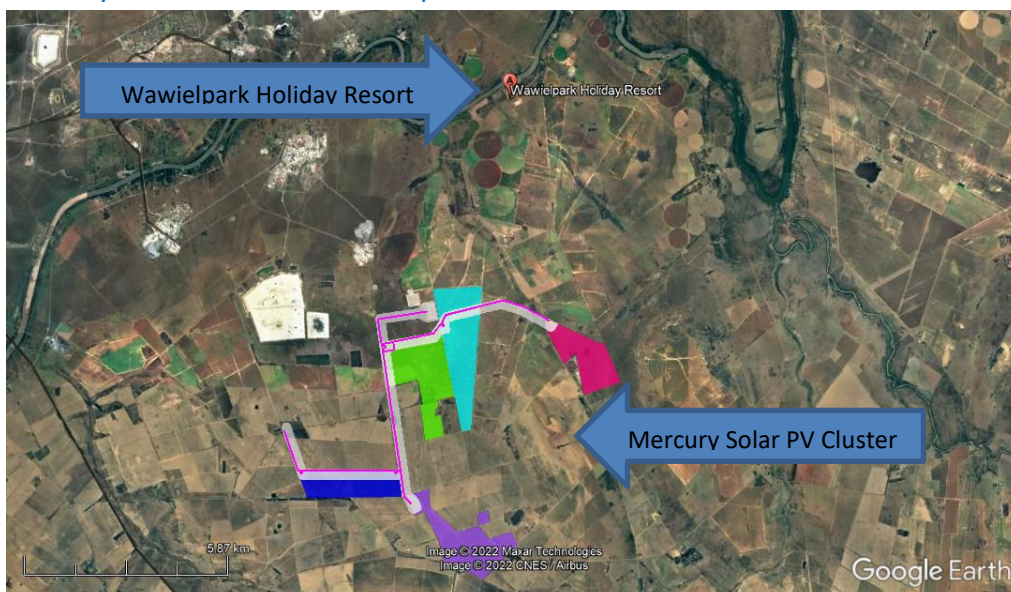
1. The IAP Register was updated with the contact details as requested.
2. The BID, which was the only documented distributed to date, was attached for their perusal and comment.
3. Landscape Dynamics requested to be added to the IAP Register for the Phofu Solar Power Plant project.

Adjacent landowner: The Remainder of the Farm Kleinfontein, No 369 and the Owner of Wawielpark Holiday Resort: Mr Hansie Muller. Comment written and submitted by Mr Hannes Ollewagen on behalf of Mr Hansie Muller.

1. Mr Muller has in principle no objection to the development of solar PV facilities in the Viljoenkroon area.
2. It seems as if some of the proposed PV facilities are being planned on high quality crop land, which would most probably not being approved by the Department of Agricultural. Other solar developments in the area use grazing and not crop land for solar developments.
3. The Wawielpark Holiday Resort is situated to the north of the proposed Mercury solar PV Cluster and it should be determined what the impact of the developments will be on this holiday resort. The resort must be easily accessible at all times and construction of the solar PV facilities must not hinder access to this development at any time. Holiday resorts have suffered greatly during the last 2 years.

Response from Landscape Dynamics

1. It is noted that Mr Muller has in principle no objection to the proposed solar PV development.
2. A comprehensive Agricultural Impact Assessment was undertaken for this project and the development proposal as submitted in the BID changed to specifically exclude high quality agricultural land. Further note that application has been made to the Department of Agriculture for No Objection letters, without which Environmental Authorisation will in all probability not being granted. High quality agricultural land will thus not be developed.
3. The Wawielpark Holiday Resort is approximately 6km away from the closest proposed solar PV facility. The resort is furthermore on the banks of the Vaal River and not in close proximity to the major routes that will be used during either the construction or operational period of the proposed solar PV facilities. A Traffic & Transport Management Plan was compiled by JG Afrika traffic engineers and it was concluded that, with the implementation of mitigation measures, the impact on the traffic during all phases of development will be low and acceptable. It is highly unlikely that access to the Wawielpark Holiday Resort will be hindered during all phases of the Mercury Solar PV Cluster development.



Harmony Gold Mining Company: Electrical Engineer – Renewable Energy: Mr Louis Botha

1. Mr Botha requested to be registered as an IAP
2. The kml files of the proposed development was requested
3. Mr Botha phoned Landscape Dynamics and explained that a special procedure needs to be followed when power lines crosses land belonging to a mine.

Response from Landscape Dynamics

1. Mr Botha and the Harmony mine is a registered IAP.
2. The requested kml files were emailed to Mr Botha
3. It is Landscape Dynamics' understanding that the following two properties may be affected (the white blocks on the map below):
 - a. Remainder of the Farm, Moab, No 279
 - b. The Farm Zaiplaats, Portion 2, No 190



5. Landscape Dynamics requested Mr Botha in several emails to raise his concerns in writing or that a meeting with Mulilo can be arranged, but no further reply from Mr Botha was received.

Subsolar Energy (Pty) Ltd: Project Manager: Ms Hermien Slabbert

Ms Slabbert requested to be added to the IAP register

Response from Landscape Dynamics

- Subsolar was added to the IAP register as requested
- No further comment was received

The Landowner of the Remainder of Farm Ratpan 441: Mr Hans Pretorius

Mr Pretorius expressed his concern about a certain section of land that was shown on the Ratpan PV facility map to be included in the development. This section of land however is being used for agricultural purposes and needs to be excluded from the development.

Response from Landscape Dynamics

- The white section in the map below was originally included as part of the PV site but the borders of the proposed development site were amended to exclude this section of land.



Mr Pretorius contacted Landscape again in August 2022 and requested to see the newest layout map. He was of the opinion that the layout as proposed will divided his farm into fragmented units and that the development of a solar facility on Ratpan should not be allowed. During conversations with Landscape Dynamics he further expresses his concern that, due to the small size of the PV facility (80MW proposed at that time), the rental income will not be sufficient to cover his loss of income due to the smaller size of land available for farming practices. Mulilo visited Mr Pretorius and they undertook 'n detailed site investigation with Mr Pretorius. It came to light that the aquatic and botanical demarcations were incorrect and if these can be corrected, a PV facility of 120MW will be possible and Mr Pretorius may then accept the proposed PV development on his farm.

After careful consideration, the aquatic and botanical specialists amended their delineations and a new development layout was created by Mulilo. This layout is as presented in this report and represents a PV facility of 120MW.

8.4 Comment received on the Draft Basic Assessment Report

Comment received on the Draft BAR (this document) will be included in the Final BAR.

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