



FINAL BASIC ASSESSMENT REPORT

for

BLOEMSMOND 4

on Portion 5 and Portion 14 of the Farm Bloemsmond 455

In terms of the
National Environmental Management Act (Act No. 107 of 1998, as
amended) & 2014 Environmental Impact Regulations

Prepared for Applicant: Bloemsmond Solar 4 (Pty) Ltd.

Date: 09 September 2019

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Report Reference: KAI582/05

Department Reference: 14/12/16/3/3/1/2044

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DOCUMENT TRACKING

DOCUMENT HISTORY

| REVISION | DATE | AUTHOR |
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| Draft Basic Assessment Report | 07 August 2019 | Dale Holder |
| Final Basic Assessment Report | 09 September 2019 | Dale Holder |
| Draft Environmental Management Programme | 07 August 2019 | Dale Holder |
| Final Environmental Management Programme | 09 September 2019 | Dale Holder |

APPROVAL FOR RELEASE

| NAME | TITLE | SIGNATURE |
|-------------|-----------------------------------|---|
| Dale Holder | Senior Environmental Practitioner |  |

DISTRIBUTION

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| Department of Environmental Affairs |
| Atlantic Energy Partners |

SUBMISSION AND CORRESPONDENCE

| SUBMISSION / CORRESPONDENCE | DATE |
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| Application form Submitted | 14 June 2019 |
| Application form Acknowledged | 24 June 2019 |
| Draft Basic Assessment Report Submitted | 07 August 2019 |
| Draft Basic Assessment Report Acknowledged | 14 August 2019 |
| Comment on Draft Basic Assessment Report | 05 September 2019 |
| Final Basic Assessment Report Submitted | 09 September 2019 |

APPOINTED ENVIRONMENTAL ASSESSMENT PRACTITIONER:

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Report written & compiled by: Dale Holder (Ndip Nature Conservation), who has over 15 years' experience as an environmental practitioner.

Registrations: Director, Louise-Mari van Zyl (MA Geography & Environmental Science [US]; Registered Environmental Assessment Practitioner with the Interim Certification Board for Environmental Assessment Practitioners of South Africa, EAPSA). Ms van Zyl has over fifteen years' experience as an environmental practitioner.

PURPOSE OF THIS REPORT:

DEA decision making

APPLICANT:

Bloemsmond Solar 4 (Pty) Ltd

CAPE EAPRAC REFERENCE NO:

KAI582/05

DEPARTMENT REFERENCE:

14/12/16/3/3/1/2044

SUBMISSION DATE:

09 September 2019

Final Basic Assessment Report

in terms of the

National Environmental Management Act, 1998 (Act No. 107 of 1998 as amended) & Environmental Impact Regulations 2014 (as amended)

Bloemsmond 4

Portion 5 and Portion 14 of the Farm Bloemsmond 455.

Submitted for:

Stakeholder Review & Comment

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REPORT DETAILS

| | |
|--|--|
| Title: | Final Basic Assessment Report for Bloemsmond 4 |
| Purpose of this report: | <p>This Final Basic Assessment Report is made available to all registered and potential Interested and Affected Parties (I&APs) for review and comment and all comments received will be incorporated into the Final Basic Assessment Report that will be submitted to the competent authority for decision making.</p> <p>This BAR forms part of a series of reports and information sources that are being provided during the Basic Assessment Process for the proposed Bloemsmond 4 near Keimoes in the Northern Cape Province. Registered I&APs were given an opportunity to comment on the following reports as part of this environmental process:</p> <ul style="list-style-type: none"> - Draft Basic Assessment Report, - All Specialist Studies, and - Draft Environmental Management Programme. <p>In accordance with the regulations, the objectives of an environmental process are to, through a consultative process:</p> <ul style="list-style-type: none"> (a) identify the relevant policies and legislation relevant to the activity; (b) motivate the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location; (c) identify and confirm the preferred activity and technology alternative through an impact and risk assessment and ranking process; (d) identify and confirm the preferred site, through a detailed site selection process, which includes an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified alternatives focusing on the geographical, physical, biological, social, economic, and cultural aspects of the environment; (e) identify the key issues to be addressed in the assessment phase; (f) agree on the level of assessment to be undertaken, including the methodology to be applied, the expertise required as well as the extent of further consultation to be undertaken to determine the impacts and risks the activity will impose on the preferred site through the life of the activity, including the nature, significance, consequence, extent, duration and probability of the impacts to inform the location of the development footprint within the preferred site; and (g) identify suitable measures to avoid, manage or mitigate identified impacts and to determine the extent of the residual risks that need to be managed and monitored. <p><u>The Draft Basic Assessment Report was available to all registered and potential interested and affected parties for a 30 day review and comment period extending from 07 August 2019 – 07 September 2019.</u></p> <p>All comments received during this comment period have been incorporated into this Final BAR that is hereby submitted to the DEA for Decision making.</p> |
| Prepared for: | Bloemsmond Solar 4 (Pty) Ltd |
| Published by: | Cape Environmental Assessment Practitioners (Pty) Ltd. (Cape EAPrac) |
| Authors: | Mr Dale Holder |
| Reviewed by: | Ms Melissa Mackay |
| Cape EAPrac Ref: | KAI582/05 |
| DEA Case officer & Ref. No: | Dakalo Netshiombo 14/12/16/3/3/1/2044 |
| Date: | 09 September 2019 |
| To be cited as: | <i>Cape EAPrac</i> , 2019. Final Basic Assessment Report for Bloemsmond 4. Report Reference: KAI582.05. George. |

TECHNICAL CHECKLIST

The following technical checklist is included as a quick reference roadmap for the proposed project.

| | | |
|-------------------------------|-----------------------------------|------------------------------|
| Applicant Details | Applicant Name: | Bloemsmond Solar 4 (Pty) Ltd |
| | Company Registration Number: | 2019 /197640 / 07 |
| | BBBEE Status: | n/a |
| | Project Name: | Bloemsmond 4 |
| Size of the study area | Size in ha of initial study area. | 360ha |

| | | |
|-----------------------------------|---|--|
| Development Footprint | This includes the total footprint of PV panels, auxiliary buildings, onsite substation, inverter stations and internal roads. | Approximately 268ha |
| Capacity of the facility | Capacity of facility (in MW) | 100MW |
| Solar Technology selection | Type of technology | Solar photovoltaic (PV) with either of fixed-tilt, single-axis tracking- or dual-axis tracking-mounting structures. |
| | Structure height | Solar panels a maximum of \pm 3.5m from ground level |
| | Surface area to be covered (including associated infrastructure such as roads) | Approximately 268ha |
| | Structure orientation | Fixed-tilt: north-facing at a defined angle of tilt Single-axis: horizontal axis tracking from east to west |
| | Laydown area dimensions | Approximately 2-5ha of laydown area will be required (the laydown areas will not exceed 5ha and will be situated within the assessed footprint). |

The PV energy facility is to consist of solar photovoltaic (PV) technology, fixed-tilt-, single-axis tracking- or dual-axis tracking- mounting structures, with a net generating capacity of 100 MW as well as associated infrastructure, which will include:

- On-site switching-station / substation;
- Auxiliary buildings (gate-house and security, control centre, office, warehouse, canteen & visitors centre, staff lockers etc.);
- Inverter-stations, transformers and internal electrical reticulation (underground cabling);
- Access and internal road network;
- Laydown area;
- Bloemsmond 4 will connect from the on-site substation to the Uppington MTS via the Bloemsmond collector substation (this basic assessment process only includes the IPP portion of the on-site substation, while the remainder of the grid connection is being assessed as part of a separate basic assessment process).
- Rainwater tanks; and
- Perimeter fencing and security infrastructure.

COMPONENT DETAILS

| Component | Description/ Dimensions |
|------------------------------|--|
| Location of the site | Approximately 25km West of Uppington along the N14 |
| PV Panel area | A maximum of 250ha with a total project footprint of approximately 268ha |
| SG Codes | PV development on: C02800000000045500014 C02800000000045500005 Access road on: C02800000000045500025 |
| Preferred Site access | The Eastern Access Alternative from the N14. |
| Export capacity | 100 MW |
| Proposed technology | PV with fixed-tilt-, single-axis tracking- or dual-axis tracking- mounting structures. |

| | |
|---|--|
| Height of installed panels from ground level | Solar panels a maximum of \pm 3.5m from ground level |
| Width and length of internal roads | Roads - width: up to 8m, length: up to 15km |

LOCATION OF PREFERRED ALTERNATIVE

Two Layout Alternatives were considered as part of this environmental process. Layout Alternative 1 is the preferred alternative reflected at the co-ordinates below.¹

| Layout Alternative 1 (Preferred) | Latitude | Longitude |
|---|-----------------|------------------|
| North-West Corner | 28°33'33.37"S | 21°00'13.55"E |
| North-East Corner | 28°33'34.92"S | 21°01'15.32"E |
| South-West Corner | 28°34'56.85"S | 21°00'59.66"E |
| South-East Corner | 28°34'46.40"S | 21°01'52.04"E |

CONTENTS OF A BASIC ASSESSMENT REPORT.

Appendix 1 of Regulation 326 of the 2014 EIA Regulations (as amended) contains the required contents of a Basic Assessment Report. The checklist below serves as a summary of how these requirements were incorporated into this Basic Assessment Report.

| Requirement | Details |
|--|---|
| (1) A basic assessment report must contain the information that is necessary for the competent authority to consider and come to a decision on the application, and must include - | |
| (a) Details of - The EAP who prepared the report; and The expertise of the EAP, including, a curriculum vitae. | The report was compiled by Dale Holder of Cape EAPrac. The author has thirteen years' experience as an EAP and holds a ND Nature Conservation qualification. The CV of the EAP and Company Profile is included as Annexure J4 of this report. |
| (b) The location of the activity, including – The 21 digit Surveyor General code of each cadastral land parcel; Where available, the physical address and farm name; Where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties. | PV Development on: C02800000000045500014 C02800000000045500005 Access road on: C02800000000045500025 \pm 25km West of Upington in the Northern Cape <u>Corner co-ordinates:</u> North-West Corner 28°33'33.37"S 21°00'13.55"E North-East Corner 28°33'34.92"S 21°01'15.32"E South-West Corner 28°34'56.85"S 21°00'59.66"E South-East Corner 28°34'46.40"S 21°01'52.04"E |
| (c) a plan which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale, or, if it is A linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or On land where the property has not been defined, the coordinates within which the activity is to be undertaken. | Refer to Appendix A and B of this report. |
| (d) a description of the scope of the proposed activity, including - All listed and specified activities triggered and being applied for; and | The relevant listed activities are captured in Section 3.1.2 The description of the activity is provided in Section 2 of this report with graphic representation provided in |

¹ The powerline to connect this facility to the national grid is being considered as part of a separate Basic Assessment process.

| Requirement | Details |
|--|---|
| A description of the activities to be undertaken including associated structures and infrastructure. | Appendix B. |
| (e) A description of the policy and legislative context within which the development is proposed, including – An identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks, and instruments that are applicable to this activity and have been considered in the preparation of the report; and .How the proposed activity complies with and responds to the legislation and policy context, plans, guidelines, tools frameworks and instruments. | Please refer to Section 3 of this document. |
| (f) A motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred location. | Please refer to Section 2.2 of this document. |
| (g) A motivation for the preferred site, activity and technology alternative. | The preferred alternative has been identified as the best practicable option and is discussed in detail in section 2.4 of this report. |
| (h) A full description of the process followed to reach the proposed preferred alternative within the site, including - <ul style="list-style-type: none"> • Details of all alternatives considered; • Details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs; • A summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them; • The environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; • The impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts - <ul style="list-style-type: none"> (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated. <ul style="list-style-type: none"> • The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives; • Positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; • The possible mitigation measures that could be applied and level of residual risk; • The outcome of the site selection matrix; • If no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and • A concluding statement indicating the preferred alternatives, including preferred location of the activity. | Section 2.4 addresses feasible and reasonable alternatives which were identified for facility. Site, layout and technological alternatives were considered. Details of Public Participation are included in section 8 of the report. A summary of all issues raised by I&APs as well as the responses thereto are included in Appendix F . The environmental attributes of the study site are included in section 5 of the report. The identification and assessment of Impacts are included in section 6 of the report. The summary of proposed mitigation measures are included in section 7 of the report. The outcome of the site selection matrix is attached in Annexure E7 and is summarised in section 2.3 of the report. The concluding statement is contained in section 6.14 of the report. |
| (i) A full description of the process undertaken to identify, assess and rank the impacts the activity will impose on the preferred location through the life of the activity, including - A description of all environmental issues and risks that were identified during the basic assessment process; and An assessment of the significance of each issue and risk and an | Please see Summary and Section 6 of the report and Appendix E for the specialist reports. |


| Requirement | Details |
|--|--|
| indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures. | |
| (j) An assessment of each identified potentially significant impact and risk, including - Cumulative impacts; The nature, significance and consequences of the impact and risk; The extent and duration of the impact and risk; The probability of the impact and risk occurring; The degree to which the impact and risk can be reversed; The degree to which the impact and risk may cause irreplaceable loss of resources; and The degree to which the impact and risk can be mitigated. | Please see Section F of the report and Appendix E for the specialist reports. |
| (k) Where applicable, a summary of the findings and impact management measures identified in any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final assessment report. | Please see Section 6 of the report and Appendix E for the specialist reports. |
| (l) An environmental impact statement which contains – <ul style="list-style-type: none"> • A summary of the key findings of the environmental impact assessment; • A map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and • A summary of the positive and negative impacts and risks of the proposed activity and identified alternatives. | Section 6.23 and 6.14 of this report. See Appendix D Section 6.13 of this report. |
| (m) Based on the assessment, and where applicable, impact management measures from specialist reports, the recording of proposed impact management objectives, and the impact management outcomes for the development for inclusion in the EMPr. | See section 7 report. |
| (n) Any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation. | See section 7 of this report. |
| (o) A description of assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed. | See 3.4 of this report. |
| (p) A reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation. | See section 9 of this report. |
| (q) Where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required, the date on which the activity will be concluded and the post construction monitoring requirements finalised. | The proposed activity does include operational aspects. |
| (r) An undertaking under oath or affirmation by the EAP in relation to: The correctness of the information provided in the reports; The inclusion of comments and inputs from stakeholders and I&APs; The inclusion of inputs and recommendations from the specialist reports where relevant; and Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties. | The declaration of the EAP is attached in Appendix G . |
| (s) Where applicable, details of any financial provisions for the rehabilitation, closure and ongoing post decommissioning management of negative environmental impacts. | This environmental assessment does not include application for decommissioning and closure of activities |
| (t) Any specific information that may be required by the competent authority. | Currently not applicable but will be included if such a request is made. |

| Requirement | Details |
|---|--|
| (u) Any other matters required in terms of section 24(4)(a) and (b) of the Act. | This section will be updated on receipt of the mandatory comment from the competent authority. |

DEA COMMENT ON DRAFT BASIC ASSESSMENT REPORT

An official from the DEA (Mr Thando Boo) undertook a site inspection on 29 August 2019. Comments on the Draft BAR were received by the EAP via email on 05 September 2019. These comments and the responses thereto are included in the table below.

| Comment | Response |
|--|---|
| Activities applied for: | |
| Ensure that only relevant listed activities are applied for and can be linked to the development activity or infrastructure as described in the project description. If the activities applied for in the application form are amended, an amended application form must be submitted with the Final BAR | Table 7 in section 3.1.2 of the report contains a table that links the listed activities applied for with the various development aspects described in the project description. An amended application form is however attached in Appendix I (this amended application form provides clarification on applicability of listed activities that were not known at the stage of submission of the original application, i.e. prior to the undertaking of specialist studies. |
| Furthermore, provide a detailed description of the project relating to each of the triggered listed activities i.e. the width of the proposed access roads is not provided in the description of activity 24, listing notice 1 as applied for. | An additional table (Table 7) has been included in section 3.1.2 of the report. This table links the listed activities applied for with the various development aspects described in the project description. The main access road is approximately 8m in width and the internal road network is approximately 4-5m in width. |
| Furthermore, it was noted that activity 56, has been described as follows: "the existing access road will be widened by more than 8m in certain sections and will be lengthened by more than 1km to access the pv site" you are advised to provide the actual width and length of the road. | BM4 The preferred access road (i.e. Eastern Access Alternative) is approximately 8.6 km (from the N14 to the point where it enters the site at the location of the O&M complex. This Main access road will be approximately 8m wide. Existing tracks along parts of the proposed access range from 2 -5m and as such will require widening of between 3m and 6m. |
| It is also noted that activity 4, 12 and 14 of listing notice 3 are applied for with their applicability to be determined with input from the Ecological Specialist. Please ensure that the applicability of such activities are confirmed and an amended application form is submitted either with the omission of such activities or with the proper description and or correct wording, as it was noted that you indicated the infrastructure may be within an endangered ecosystem or within a critical biodiversity area. | Subsequent to the submission of the original application where activities 4, 12 and 14 were applied for, the Ecology Specialist has confirmed the following: <ul style="list-style-type: none"> The project is located in the Kalahari Karroid Shrubland and Bushmanland Arid Grassland both these vegetation types are least threatened (i.e. not endangered or critically endangered as described in activity 4, 12 and 14. A very small portion of the access road will cross a CBA 2 as per the 2016 Northern Cape CBA map. The amended application form in appendix I has been updated to confirm the applicability of these activities. |
| The Final BAR | |
| Please ensure that the hard copies of the final BAR are appropriately banded as the pages on the Draft BAR are falling out. | The Draft BAR was bound using a hot glue binder. We will submit the Final BAR in ring-bound format to be more durable. |
| Specialist Studies | |
| Please ensure that the official declaration of interest forms for all the specialists are completed and provided in the final BAR as required in terms of Regulation 13(a) and 12(b) of NEMA EIA regulations of 2014 as amended; also provide a Curriculum Vitae of the Ecologist that conducted the ecological assessment study. | Specialist declarations of independence were included in the Draft BAR. These were however in the specialists own format. The specialists have updated their declarations of interest onto the departments official form, and these are attached in Annexure G4. The CV of the ecology specialists, along with those of the other specialists, are attached in Annexure G10. |
| Maps | |
| Please ensure that all maps and layout plan depict the infrastructure of the development inclusive of internal access roads and a noticeable symbol is used to depict the internal | The main access and internal roads are reflected on the site layout plan (Appendix D) under the following legend item: |

| Comment | Response |
|---|--|
| access roads. |  <p>The internal access roads cannot be depicted on the regional maps, as the scale is too coarse to be appropriate.</p> |
| Further ensure that the layout plan for each of the Bloemsmond developments encompasses the entire Bloemsmond development footprint with the specific development project highlighted to give an overall representation of the infrastructure for the proposed development. | An additional plan has been prepared that shows the proximity of the proposed Bloemsmond 3 to other projects on the property (including the two authorised and two in progress). A copy of this consolidated plan is attached in Appendix D1. |
| Furthermore, ensure that the soft copy of all the maps and Layout plan are provided in PDF format. | High resolution PDF copies of all maps and plans are included on the USB Flash Drive attached to this Final BAR. Further to the PDF copies of all maps and plans, please also note that the Shapefiles of the final development footprint are also included on the attached USB Flash Drive. |
| The Final BAR must indicate clearly the name of the newspaper that the advertisement for the draft BAR has been advertised. | This was advertised in "Die Gemsbok" newspaper. A copy of this advert is included in Appendix F3. |
| Further, the final BAR must indicate that this draft BAR has been subjected to 30 days public participation process stating the start and end date of the PPP. | The Draft BAR was available for review and comment for a period extending from 07 August to 09 September 2019. Proof of availability and notifications in this regard are attached in Annexure F4. |
| Please ensure that comments from all relevant stakeholders are submitted to the Department with the final BAR. This includes, but not limited to the Northern Cape Department of Environment and Conservation, The South African Heritage Resources Agency (SAHRA), the Department of Environmental Affairs: Directorate Biodiversity and Conservation, Kai Garib Local Municipality, ZF Mgcawu District Municipality and the Department of Water and Sanitation. | Northern Cape Department of Environment and Conservation, The South African Heritage Resources Agency (SAHRA), the Department of Environmental Affairs: Directorate Biodiversity and Conservation, Kai Garib Local Municipality, ZF Mgcawu District Municipality and the Department of Water and Sanitation were all notified of the availability of the Draft BAR. Proof of notifications to these stakeholders are included in Annexure F4. These parties were furthermore reminded to provide comment during the comment period. Of these parties listed, only comment was received from: <ul style="list-style-type: none"> - Kai Garib Municipality (confirmation of availability of services). - SAHRA (online acknowledgement of application) - Department of Water and Sanitation (online acknowledgement of Water Use Licence Application). It must also be noted that the Department of Water and Sanitation have also undertaken a site inspection in respect of the S21 (i) and (c) applications. |
| Ensure that all issues raised and comments received during the circulation of the draft BAR from registered I&AP's and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the Final BAR. | A comments and responses report is attached in Annexure F2. |
| Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. | The EAP requested all registered and potential I&APs to provide comments on the Draft BAR. Key stakeholders were provided with full digital copies of the Draft BAR and all appendices on CD. Additional reminders were also sent to registered and potential I&APs. Proof of all this documentation is attached in Annexure F4. |
| General Comments: | |
| The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the EIA regulations 2014, as amended | Please refer to table 47 in section 8 of this report for a checklist demonstrating compliance with these regulations. |
| You must note that the final BAR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of BAR in accordance with Appendix 1 and Regulation 19(1) (a) and 19 (3) of the EIA | Please refer to the checklist at the beginning of this report demonstrating compliance with Appendix 1 and Regulation 19(1) (a) and 19 (3) of the EIA regulations, 2014 as amended. |

| Comment | Response |
|---|--|
| regulations, 2014 as amended. | |
| Further, note that in terms of Regulation 45 of the EIA regulations, 2014 as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these regulations, unless an extension has been granted in terms of Regulation 3(7) | The application form was received by the Department on 14 June 2019. In terms of the regulated timeframes, the Final BAR must therefore be submitted to the Department by no later than 14 September 2019. |

ORDER OF REPORT

Report Summary

Final Basic Assessment Report – Main Report

| | | |
|---------------------|---|---|
| Appendix A | : | Location, Topographical Plans |
| Appendix B | : | Biodiversity Overlays |
| Appendix C | : | Site Photographs |
| Appendix D | : | Solar Facility Layout Plans |
| Appendix D1 | : | Cluster Maps showing all projects on the Bloemsmond property |
| Appendix E | : | Supplementary Reports (Specialist Reports and Technical Reports) |
| Annexure E1 | : | Ecological Impact Assessment Report (Terrestrial and Avifaunal) (Confluent, 2019) |
| Annexure E2 | : | Freshwater Ecological Impact Assessment (Confluent, 2019) |
| Annexure E3 | : | Agricultural Impact Assessment Report (Lubbe, 2019) |
| Annexure E4 | : | Archaeology Impact Assessment Report (van der Walt, 2019) |
| Annexure E5 | : | Palaeontology Desktop Study (Almond, 2019) |
| Annexure E6 | : | Visual Impact Assessment (Stead, 2019) |
| Annexure E7 | : | Social Impact Assessment (Barbour, 2019) |
| Annexure E9 | : | Technical Design Report (AEP, 2019) |
| Annexure E10 | : | Water Consumption Study (AEP, 2019) |
| Annexure E11 | : | Site Selection Matrix (AEP, 2019) |
| Annexure E12 | : | Traffic and Transportation Assessment (JG Africa, 2019) |
| Annexure E13 | : | Stormwater Management Plan (SRK, 2019) |
| Annexure E14 | : | Planning Statement (Macroplan, 2019) |
| Appendix F | : | Public Participation Process |
| Annexure F1 | : | I&AP Register |
| Annexure F2 | : | Comments and Response Report |
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| Appendix G | : | Other Information |
| Annexure G1 | : | Correspondence with Authorities (Acknowledgment of receipt of Application Form) |
| Annexure G2 | : | Landowner Notification |

| | | |
|---------------------|---|---|
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| Annexure G4 | : | Specialist Declarations |
| Annexure G5 | : | Title Deed / Windeed Report |
| Annexure G6 | : | Proof of Availability of Services |
| Annexure G7 | : | Proof of Submission of WULA |
| Annexure G9 | : | Proof of submission of application to SAHRA ito S38of NHA |
| Annexure G10 | : | Specialits CV's |
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EXECUTIVE SUMMARY

I. INTRODUCTION

Cape EAPrac has been appointed by Bloemsmond Solar 4 (Pty) Ltd, hereafter referred to as the Applicant, as the independent Environmental Assessment Practitioner (EAP), to facilitate the Basic Assessment process² required in terms of the National Environmental Management Act (NEMA, Act 107 of 1998) for the proposed development of the 'Bloemsmond 4' facility near Upington and Keimoes in the Northern Cape Province of South Africa.

The total generation capacity of the solar facility will not exceed 100MW_{AC} for input into the national Eskom grid. The project will feed into the National Grid via the existing Eskom Upington Major Transmission Substation (MTS). The grid connection to connect this project to the National Grid is being assessed as part of a separate environmental application process.

The purpose of this **Draft Basic Assessment Report (BAR)** is to describe the environment to be affected, the proposed project, consider all comments received, to present the site constraints identified by the various specialist during their site assessments, and identify & assess the impacts of this development on the receiving environment.

The Draft BAR was available for a 30 Day period extending from **07 August 2019 – 07 September 2019**.

All comments received on the Draft BAR have been incorporated into the Final BAR that is herewith submitted to the DEA for consideration and decision making.

RECOMMENDATION OF THIS EIA

The proposal by the Applicant is to develop a renewable energy generation facility on Portion 5 and Portion 14 of the Farm Bloemsmond 455. The project has received general support during the pre-application phases, with no major issues identified by any of the participating stakeholders nor specialists.

The Basic Assessment process, through various investigations, has found that the proposal can be conditionally supported and that the potential negative impacts that may arise from this development can be effectively mitigated.

It is thus Cape EAPrac's considered opinion that the preferred alternative (Layout Alternative 1 and the Eastern Access Road Alternative) can be considered for approval.

NEED AND DESIRABILITY

Need and desirability for this project has been considered in detail in this environmental process. The overall need and desirability in terms of developing renewable energy generation in South Africa and globally is considered in section 1, while the project specific need and desirability is considered in section 5.

ENVIRONMENTAL LEGISLATIVE REQUIREMENTS

The current assessment is being undertaken in terms of the **National Environmental Management Act** (NEMA, Act 107 of 1998). This Act makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the competent authority (in this case, the National Department of Environmental Affairs, DEA) based on the findings of an Environmental Assessment.

² The environmental process follows a Basic Assessment process, as it is located within the Upington Renewable Energy Development Zone, which was formally gazetted in 2018 in GN 113 and GN114.

The proposed development entails a number of listed activities, which require a Basic Assessment Process, which must be conducted by an independent EAP. Cape EAPrac has been appointed to undertake this process.

Table 1: NEMA 2014 (As amended in April 2017) listed activities applicable to Bloemsmond 4.

| Activity No(s): | Basic Assessment Activity(ies) as set out in Listing Notice 1 (GN R983) | Description |
|-----------------|--|--|
| 11 | The development of facilities or infrastructure for the transmission and distribution of electricity— (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts; | Construction of the IPP portion of the on-site substation outside of an urban area ³ . |
| 12 | The development of— (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs— (a) within a watercourse; | Construction of internal and perimeter roads as well as PV mounting structures across the ephemeral washes identified on Portion 5 and Portion 14 of the Farm Bloemsmond 455. |
| 19 | The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse; | Construction of internal and perimeter roads as well as PV mounting structures across the ephemeral washes identified on the properties. |
| 24 | The development of a road— (ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres; | Construction of the main access road to the proposed Bloemsmond 4 PV facility. |
| 28 | Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; | The Bloemsmond 4 PV facility is considered as commercial use, being proposed on an area used for agricultural purposes. |
| 56 | The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre— (ii) where no reserve exists, where the existing road is wider than 8 metres; | The existing access road will be widened by more than 6m in certain sections and will be lengthened by more than 1km to access the PV site. |
| Activity No(s): | Basic Assessment Activity(ies) as set out in Listing Notice 3 (GN R985) | Description |
| 4 | The development of a road wider than 4 metres with a reserve less than 13 metres. g. Northern Cape iii. Outside urban areas: (ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; | The access road to the project crosses a CBA in the South of the Property. This road will be wider than 4 metres. |
| 12 | The clearance of an area of 300 square metres or more of indigenous vegetation. g. Northern Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial | The access road to the project crosses a CBA in the South of the Property. The construction of this section of road will require the removal of more than 300 square metres within this CBA. |

³ Bloemsmond 4 will connect from the on-site substation to the Upington MTS via the Bloemsmond collector substation (this Basic Assessment process only includes the IPP portion of the on-site substation, while the remainder of the grid connection is being assessed as part of a separate Basic Assessment process).

| Activity No(s): | Basic Assessment Activity(ies) as set out in Listing Notice 1 (GN R983) | Description |
|-----------------|---|--|
| | Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; | |
| 14 | The development of— (ii) infrastructure or structures with a physical footprint of 10 square metres or more. g. Northern Cape ii. Outside urban areas: (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; | The access road to the project crosses a CBA in the South of the Property. This road in the CBA will exceed 10m. |
| Activity No(s): | Scoping and EIR Activity(ies) as set out in Listing Notice 2 (GN R984) | Description |
| 1 | The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more, | The proposed Bloemsmond 4 comprises a renewable energy generation facility, which will utilise PV technology and will have a net generation capacity of up to 100MW. |
| 15 | The clearance of an area of 20 hectares or more of indigenous vegetation | Bloemsmond 4 will require the clearance of more than 20 ha of indigenous vegetation. |

NOTE: Basic Assessment as well as S&EIR Activities are being triggered by the proposed development, but since the project is contained in a legislated REDZ, the EIA Process will follow a Basic Assessment process.

Before any of the above mentioned listed activities can be undertaken, authorisation must be obtained from the relevant authority, in this case the DEA. Should the Department approve the proposed activity, the Environmental Authorisation does not exclude the need for obtaining relevant approvals from other Authorities who has a legal mandate in respect of the activity.

II. DEVELOPMENT PROPOSAL & ALTERNATIVES

Bloemsmond 4 will have a net generating capacity of 100 MW_{AC} with an estimated maximum footprint of ± 268 ha. The proposed project footprint and alternatives were identified by the Applicant following the findings of the ecological expert who was appointed to develop a vegetation and sensitivity rating for the entire property; this sensitivity plan was then used to determine the two alternatives for the proposed facility footprint.

The technology under consideration is PV modules mounted on either single or double axis tracking structures. Other infrastructure includes inverter stations, internal electrical reticulation, access road, internal roads, an on-site switching station / substation (the grid connection to the Upington MTS via the Bloemsmond collector substation is being assessed as part of a separate basic assessment process), auxiliary buildings, construction laydown areas and perimeter fencing and security infrastructure.

The on-site switching station/substation will locate the main power transformer/s that will step up the generated electricity to a suitable voltage level for distribution into the national electricity grid. Auxiliary buildings include, *inter alia*, a control building, offices, warehouses, a canteen and visitors centre, staff lockers and ablution facilities, a gate house and security offices.

III. PROFESSIONAL INPUT

The following professionals⁴ have provided input into this environmental process:

- | | | |
|--------------------------------|---|---|
| 1. Ecology | - | Enviro Insight & Confluent Environmental |
| 2. Avifaunal | - | Enviro Insight & Confluent Environmental |
| 3. Archaeology | - | Heritage Contracts and Archaeological Consulting (HCAC) |
| 4. Palaeontology | - | Natura Viva |
| 5. Heritage | - | Heritage Contracts and Archaeological Consulting (HCAC) |
| 6. Agricultural Potential | - | Mr Christo Lubbe |
| 7. Visual | - | Visual Resource Management Africa (VRMA) |
| 8. Freshwater | - | Confluent Environmental |
| 9. Social | - | Tony Barbour |
| 10. Engineering aspects | - | Atlantic Energy Partners |
| 11. Stormwater | - | SRK Consulting |
| 12. Traffic and Transportation | - | JG Afrika |
| 13. Water Consumption | - | Atlantic Energy Partners |
| 14. Planning | - | Macroplan. |

IV. PLANNING CONTEXT

A Planning specialist will be appointed in order to consider the planning implications of the proposed Bloemsmond 4 and submit the required applications as follows:

- Application for land use change in terms of the Spatial Planning and Land Use Management Act, Act 16 of 2013, submitted to the Kai !Garib Municipality in terms of their Land Use Management Scheme and relevant and approved SPLUMA by-laws.
- Notification of the intended process of land use change submitted to the Department of Agriculture Forestry and Fisheries (DAFF) in terms of the Subdivision of Agricultural Land Act, Act 70 of 1970.

V. ASSESSMENT OF IMPACTS

The potential key impacts identified and assessed by the various specialists (more details on the significance and ratings of these impacts are provided in section 6 below and in the attached specialist reports).

Ecological impacts assessed

Construction Phase

- Vegetation clearing for construction could impact indigenous species as well as riparian and terrestrial plant communities. Vegetation clearing will also lead to **habitat loss** for fauna and potentially the loss of sensitive faunal species, habitats and ecosystems within the remaining natural areas.
- Presence and operation of construction machinery on site. This will create a physical impact as well as generate noise, pollution and other forms of disturbance at the site. Disturbance could affect faunal species.
- Increased human presence can lead to faunal conflict.

Operational Phase

- The presence of the development could disrupt the connectivity of the landscape.
- Human-animal conflict can occur.

⁴ Note that not all of these professionals are considered specialists as contemplated in chapter 3 of Regulation 326. Studies such as Engineering, Stormwater, Traffic, water consumption and planning constitute “technical” studies, rather than specialist studies and as such, the requirements in appendix 6 of R326 do not apply to all these professionals

- Alien clearing will improve the ecology and habitat of the area.

Cumulative Impacts

- Transformation of intact habitat could disrupt the connectivity of the landscape for fauna and flora and impair their ability to respond to environmental fluctuations.

Freshwater impacts assessed

- Disturbance to riparian habitat;
- Disturbance to watercourse bed and banks;
- Sedimentation of downstream watercourses;
- Water Quality Impacts; and
- Alien plant introduction

Heritage Impacts Assessed

Construction Phase

- Impact on scenic routes during construction

Operational Phase

- Impacts on the heritage resources.
- Impact on scenic routes.
- Impact of new structures on cultural landscape and character.

Cumulative impacts

- Change to the rural character.
- Socio-economic upliftment.

Archaeological Impacts Assessed

Construction Phase

- Disturbance to surface and sub-surface sediments

Operational Phase

- None

Cumulative Impacts

- No cumulative impacts will arise

Visual Impacts Assessed

Construction Phase

- Visual scarring as a result of new development, clearing vegetation and construction works.

Operational Phase

- Change in the rural visual character of the site.
- Visual impact on key visual receptors and secondary visual receptors.
- Potential visual.
- Visibility from sensitive receptors.
- Visual intrusion of lighting at night.

Socio-Economic Impacts Assessed

Construction Phase

- Creation of business and employment opportunities
- Impacts associated with the presence of construction workers on site;
- Security and safety impacts associated with the presence of construction workers;
- Noise, dust and safety impacts associated with construction related activities and the movement of heavy vehicles.

Operational Phase

- Creation of employment and business opportunities;
- Impact on rural sense of place and character of the area;
- Crime levels and pressure on local services.

Impact Summary

The table below summarises the significance (with mitigation) of all impacts assessed in the sections above⁵. For ease of easy references, impacts are visually reflected using the following colour scheme⁶.

All positive impacts (regardless of their significance)

Neutral or Negligible negative impacts

Very Low and Low negative impacts

Medium negative impacts

Medium – High, High and Very High negative impacts



Table 2: Summary of the significance of impacts associated with Bloemsmond 4⁷.

| Impact | Significance (with mitigation) |
|---|--------------------------------|
| Social Impacts during the construction Phase | |
| Creation of employment and business opportunities | Medium positive |
| Presence of construction workers and potential impacts on family structures and social networks. | Low negative |
| Influx of job seekers. | Low negative |
| Safety risk, stock theft and damage to farm infrastructure associated with presence of construction workers. | Low negative |
| Increased risk of veld fires | Low negative |
| Impact of heavy vehicles and construction activities. | Low negative |
| Loss of farmland. | Low negative |
| Social Impacts during the operational phase | |
| Promotion of renewable energy projects | High positive |
| Creation of employment and business opportunities | Medium positive |
| Establishment of Community Trust | High positive |
| Generate income for affected landowner/s | Medium positive |
| Visual impact and impact on sense of place | Low negative |
| Impact on tourism | Low positive and negative |
| Visual Impacts during construction and operation phase | |
| Change of local and surrounds visual resources due to the construction and operation of the proposed (3.5m high) PV structures, and buildings. | Low negative |
| Change of local and surrounds visual resources due to the construction and operation of the proposed road access. | Low negative |
| Palaeontological Impacts | |
| Impact on potential palaeontological resources | Low negative |
| Agricultural Impacts | |
| Soil pollution with contaminants during the construction phase may take place, including spillages of hydrocarbon (fuel oil) and cement. This is possible during the construction of all facets of the facility: laydown area, concrete foundations of the auxiliary buildings, inverter stations subterranean cabling, main access and internal service roads. | Low negative |
| The establishment of the PV Solar facility will be done at the expense of agricultural land. | Low negative |

⁵ In order to attain these outcomes, the mitigation measures reflected in section 7 of the report need to be implemented.

⁶ Where specialist ratings fall across 2 of the groups, the worst case is reflected in the quick reference.

⁷ This includes cumulative impacts associated with the facility

| Impact | Significance (with mitigation) |
|---|--------------------------------|
| The area to be lost for agricultural development would be 268ha in size. This includes the area under PV panels, internal service roads and temporary laydown area | |
| The construction of a PV Solar facility will cause impairment of the land capability with the potential risk of erosion | Low negative |
| The establishment of the PV Solar facility may alter drainage patterns with construction and cause erosion | Low negative |
| Soil pollution with contaminants during the operational phase may take place, including spillages of hydrocarbon (fuel oil) and cement. This is possible during the maintenance of the facility. | Low negative |
| The establishment of the PV Solar facility will be done at the expense of agricultural land. Area to be lost for agricultural development would be 268 ha in size. This includes the area under PV panels, internal service roads and temporary laydown area. | Low negative |
| The quantity of available soil for agricultural production decreases as result of the footprints of these facilities. The quality of soil decreases in the way the construction of these structures alters the workability of the soil. This includes the physical deformation in the soil profile (Cumulative) | Medium negative |
| Clearing of vegetation increases flow speed and a lower infiltration tempo increases silt transport (Cumulative) | Medium negative |
| Chemicals, hazardous substances and waste used or generated during live span of the facility accumulate and pollute soil will become contaminated (Cumulative) | Medium negative |
| Freshwater Ecology Impacts | |
| Disturbance to riparian habitat | Negligable negative |
| Disturbance to watercourse bed and banks | Negligable negative |
| Sedimentation of downstream watercourses | Negligable negative |
| Water quality impacts downstream | Negligable negative |
| Alien plant introduction | Negligable negative |
| Alien Vegetation Management | Negligable negative |
| Solar Panel Washing | Negligable negative |
| Spills and Waste Management | Negligable negative |
| Terrestrial Fauna Impacts | |
| Slashing of vegetation | Medium negative |
| Rammed in H beams | Medium negative |
| Site camps and laydown areas | Medium negative |
| Direct loss of flora species of conservation concern and flora species endemic to the region | Medium negative |
| Stochastic events such as fire | Low/Medium negative |
| Staff or construction workers poaching and hunting | Low negative |
| Collisions with vehicles | Low/Medium negative |
| Intentional killing of fauna | Lownegative |
| Loss of species of conservation concern | Medium negative |
| Vegetation clearing/ construction preparation | Low/Medium negative |
| Access roads and construction works | Low/Medium negative |
| Solar panels (operational) | Low/Medium negative |
| Vehicles and machinery | Medium negative |
| Soil disturbance | Low/Medium negative |
| Vegetation clearing | Low/Medium negative |
| Roads and hardened surfaces | Low/Medium negative |

As can be seen from the table above, there are a number of positive impact associated with Bloomsmond 4. The majority of the negative impacts are either low or negligible, with a few Low – Medium and Medium Impacts. There are no high or very high impacts associated with Bloomsmond 4.

Impact Statement

None of the participating specialists identified any impacts that remain high after mitigation. Because of the risk adverse approach followed for the development of the preferred layout, all the main sensitive features, (most notably water courses, pans, archaeology features and visually sensitive areas) were avoided.

From an ecological perspective the development footprint of the preferred alternative will not result in major fragmentation of the landscape. The affected area is considered suitable for development and there are no impacts associated with Bloemsmond 4 that cannot be mitigated to a medium level. As such there are no fatal flaws or high post-mitigation impacts that should prevent the development from proceeding. Based on the layout provided for the assessment, Bloemsmond 4 can be supported from an ecology, visual, social and agricultural point of view.

A map showing the proposed activity in relation to the key sensitive features is in attached in **Appendix D**. All sensitive features along with their appropriate buffers are shown in this plan. As required by the EMPr, all areas outside of the proposed development footprint are to be demarcated as no go areas.

Please refer to the table in the section above listing the key impacts and their significance post mitigation for the preferred alternative. This section must be read in conjunction with the suggested mitigation measures listed in section 7 of this Report.

VI. CONCLUSIONS & RECOMMENDATIONS

This environmental process is currently being undertaken to present proposals to the public and potential I&APs and to identify and assess environmental impacts, issues and concerns raised as a result of the proposed development alternatives.

Cape EAPrac is of the opinion that the information contained in this BAR and the documentation attached hereto is sufficient to allow the I&APs to apply their minds to the potential negative and/or positive impacts associated with the development, in respect of the activities applied for. This environmental process has not identified any fatal flaws with the proposal and as such it is our reasoned view that the project should be considered to be conditionally authorised. All specialists concur that the development as proposed (Layout Alternative 1 and Eastern Access Alternative) can be considered for approval and that there are no reason(s) why the development should not be implemented. All impacts range from high positive to medium negative and all high and medium - high negative impacts have been avoided by the risk adverse approach to the development of this facility.

All stakeholders were requested to review this Draft BAR and the associated appendices, and provide comment, or raise issues of concern, directly to *Cape EAPrac* within the specified 30-day comment period. All comments received during this comment period have been included in the Final BAR that is herewith submitted to DEA for decision making.

It is the recommendation of this office that the development proposal, Layout Alternative 1 and Eastern Access Road Alternative be considered for approval by the competent Authority on condition that all other legislative approvals be obtained, and that the final EMPr be adhered to.

REMAINDER OF ENVIRONMENTAL PROCESS

The following process is to be followed for the remainder of the environmental process:

- The Final BAR is herewith submitted to the DEA for consideration and decision-making;
- The DEA's decision (Environmental Authorisation) and the appeal process on the Final BAR will be communicated with all registered I&APs.

FINAL BASIC ASSESMENT REPORT

1 INTRODUCTION

Cape EAPrac has been appointed by Bloemsmond Solar 4 (Pty) Ltd, hereafter referred to as the Applicant, as the independent Environmental Assessment Practitioner (EAP), to facilitate the Basic Assessment process⁸ required in terms of the National Environmental Management Act (NEMA, Act 107 of 1998) for the proposed development of the 'Bloemsmond 4' facility near Upington and Keimoes in the Northern Cape Province of South Africa.

The total generation capacity of the solar facility will not exceed 100MW for input into the national Eskom grid.

The project will feed into the National Grid via the Bloemsmond collector substation to the existing Eskom Upington MTS. (The grid connection, excluding the IPP portion of the on-site substation is being assessed as part of a separate environmental application process).

The purpose of this **Final Basic Assessment Report** (BAR) is to describe the environment to be affected, the proposed project, consider all comments received, to present the site constraints identified by the various specialist during their site assessments, and identify and assess the impacts of this development on the receiving environment.

The Draft BAR was available for a 30 Day period extending from **07 August 2019 – 07 September 2019**.

All comments received on the Draft BAR have been incorporated into this Final BAR that is herewith submitted to the DEA for consideration and decision making.

1.1 RECOMMENDATION OF THIS EIA

The proposal by the Applicant is to develop a renewable energy generation facility on Portion 5 and Portion 14 of the Farm Bloemsmond 455. The project has received general support throughout the ongoing environmental application, with no major issues identified by any of the participating stakeholders nor specialists.

The Basic Assessment process, through various investigations, has found that the proposal can be conditionally supported and that the potential negative impacts that may arise from this development can be effectively mitigated.

It is thus Cape EAPrac's considered opinion that the preferred alternative (Layout Alternative 1 and the Eastern Access Road Alternative) can be considered for approval.

1.2 OVERVIEW OF ALTERNATIVE ENERGY IN SOUTH AFRICA AND THE NORTHERN CAPE

South Africa's generation capacity is dominated by coal-fired generation stations with a net output of 35.6 GWp, which represents over 85% of the country's total installed capacity of over 44 GW.

Globally, renewable energy (RE) has gained momentum, with a significant rise in the uptake of various RE technologies such as solar PV, wind energy, biogas and other biofuels, hydroelectricity, landfill gas, geothermal energy, and concentrated solar power (CSP).

⁸ The environmental process follows a Basic Assessment process, as it is located within the Upington Renewable Energy Development Zone, which was formally gazetted in 2018 in GN 113 and GN114.

Ministerial determinations by the South African government to procure RE — such as the Integrated Resource Plan (IRP) for Electricity 2010-2030, which lays out the country's electricity future — have given growth in the renewable energy sector a significant boost.

South Africa's green economy, partly driven by the country's utility-scale Renewable Energy Independent Power Production Procurement Programme (REIPPPP), reflects these trends and is leading the way in some areas. According to Moody's, South Africa had the fastest growing green economy in the world in 2015. The REIPPPP, a key factor in this growth, is in its sixth year and has achieved remarkable successes. To date, the programme has:

- Procured over 6 300 MWp of RE generation capacity, of which over 2 500 MWp was connected and has been feeding electricity into the national grid since June 2016.
- Selected 102 preferred bidders to develop utility-scale projects across the country – with projects in every province across South Africa.
- Received a ministerial determination to procure a further 6 300 MWp of generation capacity. This is the second time capacity to the programme has been doubled – a testimony to its success.
- Attracted over R195 billion of investment into South Africa, with over 25% from foreign investors. In doing so, the programme, through local content requirements, has successfully stimulated the development of a local RE technology components manufacturing sector. Given the additional 6 300 MWp still to be procured, this sector is set to grow further.
- Achieved significant technology price reductions, with South Africa boasting some of the world's lowest clean energy costs.

Beyond these successes, the programme and, consequently, the utility-scale RE industry, is well positioned to continue contributing to South Africa's national development, as enshrined in the government's Strategic Infrastructure Projects (SIP) and the National Development Plan (NDP). The programme's socio-economic development (SED) and enterprise development (ED) mechanisms give successful project developers a unique opportunity to be competitive in their bidding strategy, while contributing meaningfully to the local and national economy. Project developers have fully embraced the SED/ED component of the REIPPPP, resulting in numerous inspiring contributions to priority areas on the government's developmental agenda. Among other areas, these contributions span community development, local economic development, skills development and early childhood development.

The recent uncertainties involving the state-owned utility, Eskom, highlight the need for reforms in an evolving energy sector, where electricity generation, transmission and distribution systems require unbundling. The interest from local municipalities in procuring RE generation capacity from independent power producers (IPPs) contributes further to the shift in the structure of the country's power sector.

Regionally, the Northern Cape is suggested by many to be the ideal location for various forms of alternative energy; this has resulted in a number of feasibility studies being conducted, not least of which, an investigation by the Industrial Development Corporation in 2010 into potential for photovoltaic, thermal, solar and wind power (Northern Cape Business website, 2010).

The northern area of the Northern Cape and Namibia boasts the highest solar radiation intensity anywhere in Southern Africa. Solar energy is therefore likely to be the most viable alternative energy source for the Northern Cape, although wind-power potential is generally good along the coast (State of the Environment, S.A, 2014)

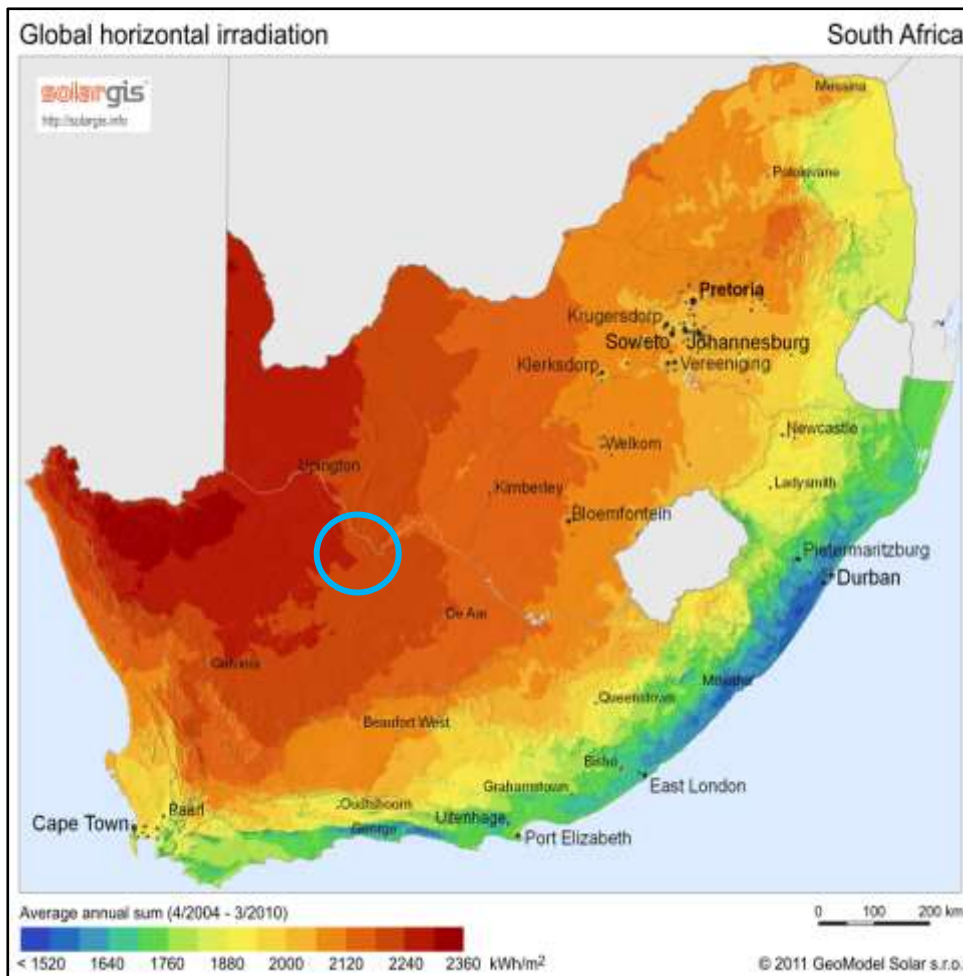


Figure 1: Global Horizontal radiation map for South Africa (Source: <http://solargis.info>, 2015) showing the approximate area proposed for Bloemsmond 4.

The Northern Cape area is considered to have extremely favourable solar radiation levels over the majority of the year, making it ideal for the production of solar-power via photovoltaic (fixed and tracking panels) and concentrated (solar thermal) solar technology systems. Several solar irradiation maps have been produced for South Africa, all of which indicate that the Northern Cape area has high solar irradiation.

The Northern Cape is not too dusty, the land is flat and sparsely populated, and there are little to no geological or climate risks, meaning that the sun can be used year-round (BuaNews online, 2014). An advantage that the Northern Cape has over the Sahara Desert is the relatively wind-free environment that prevails in large portions of the province. A Clinton Climate Initiative (CCI) pre-feasibility study has found that South Africa has one of the best solar resources on the planet (Northern Cape Business website – solar power, 2015).

The introduction of private sector generation offers multiple benefits; it will contribute greatly to the diversification of both the supply and nature of energy production, assist in the introduction of new skills and in new investment into the industry, and enable the benchmarking of performance and pricing. The Department of Energy (DoE), National Treasury (NT) and the Development Bank of Southern Africa (DBSA) established the IPP Office for the specific purpose of delivering on the IPP procurement objectives. The REIPPPP is a competitive bidding process used by national government to procure RE generation capacity in line with the national IRP for Electricity 2010-2030.

NOTE: It is the intention that Bloemsmond 4 will submit a bid under this REIPPPP.

The Strategic Environmental Assessment (SEA) for wind and solar PV energy in South Africa (CSIR, 2013) identified eight (8) Renewable Development Zones (REDZs). The REDZs identified areas where large scale renewable energy facilities can be developed in a manner that limits significant negative impacts on the environment while yielding the highest possible socio-economic benefits to the country.

Bloemsmond 4 is located within the Upington REDZ, which was formally gazetted in 2018 . The area has therefore been identified as suitable for the establishment of renewable energy facilities, specifically large scale solar farms.

1.3 ASSUMPTIONS & LIMITATIONS

This section provides a brief overview of *specific assumptions and limitations* having an impact on this environmental application process:

- It is assumed that the information on which this report is based (specialist studies and project information, as well as existing information) is **correct, factual and truthful**.
- The proposed development is **in line** with the statutory planning vision for the area (namely the local Spatial Development Plan) as well as the Upington REDZ, and thus it is assumed that issues such as the cumulative impact of development in terms of character of the area and its resources, have been taken into account during the strategic planning for the area.
- It is assumed that all the relevant **mitigation and management measures** and agreements specified in this report will be implemented in order to ensure minimal negative impacts and maximum environmental benefits.
- It is assumed that due consideration will be given to the **discrepancies in the digital mapping** (PV panel array layouts against possible constraints), caused by differing software programs, and that it is understood that the ultimate/final positioning of solar array will only be confirmed on-site with the relevant specialist/s.
- The Department of Water and Sanitation **will consider the submission of a water use application** necessary for allowing the use of water from any water resource on site. The assumption is made that water provision is to be obtained from the local municipality.
- It is assumed that Stakeholders and Interested and Affected Parties notified of the availability of this will submit all relevant **comments within the designated 30-days** review and comment period, so that these can included in the Final BAR to be timeously submitted to the competent authority, the Department Environmental Affairs, for consideration.

The assumptions and limitations of the various specialist studies are included in their respective reports attached in **Appendix E**.

2. PROPOSED ACTIVITY

The Applicant is proposing the establishment of a commercial PV facility, called Bloemsmond 4, on Portion 5 and Portion 14 of the Farm Bloemsmond 455. The proposed site is located approximately 30 km south west of Upington and 16 km north east of Keimoes in the Kai !Garib Local Municipality (ZF Mgcau District Municipality) in the Northern Cape.

The technology under consideration is PV modules mounted on either fixed-tilt or tracking structures. Other infrastructure includes inverter stations, internal electrical reticulation, internal roads, an on-site switching station / substation (the powerline from on-site substation to the Upington MTS via the Bloemsmond collector substation being assessed as part of a separate basic assessment process), auxiliary buildings, construction laydown areas and perimeter fencing and security infrastructure. Auxiliary buildings include, inter alia, a control building, offices, warehouses, a canteen and visitors centre, staff lockers and ablution facilities, a gate house, and security offices.

Table 3: Component Areas and % of Total Project Area (AEP, 2019).

| SEF Component | Estimated Area | % of Total Area (± 268ha) | % of Farm Area (4829.8239 ha) |
|--|----------------|------------------------------|----------------------------------|
| PV array | ± 252 ha | 95.20 % | 5.2 % |
| Permanent and construction laydown areas | ± 4 ha | 1.6 % | 0.08% |
| Auxiliary buildings | ± 1 ha | 0.27 % | 0.02 % |
| Internal roads | ± 10 ha | 2.64 % | 0.21 % |
| Substation | ± 1.5 ha | 0.29 % | 0.03 % |

The sections below depict the typical components associated with the Bloemsmond 4.

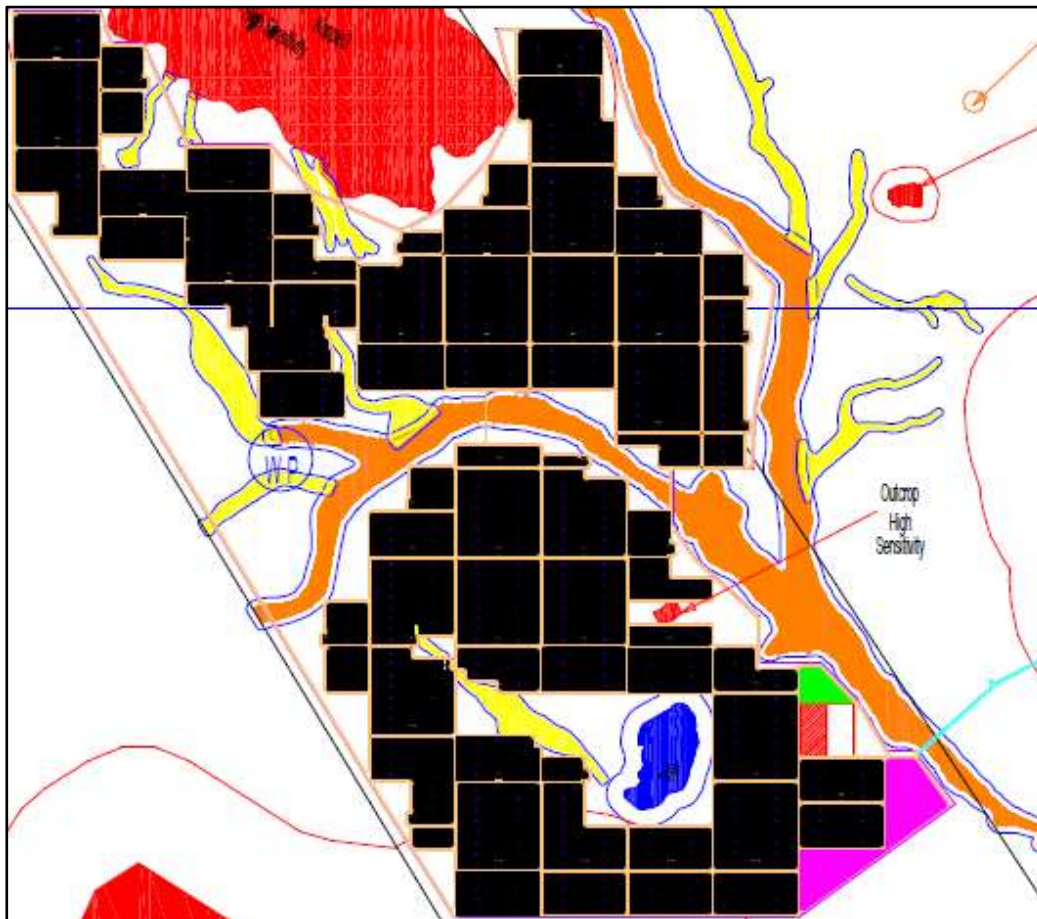


Figure 2: Proposed layout of Bloemsmond 4. Please refer to the detailed site layout plan in Appendix D.

2.1 SOLAR ARRAY

Solar PV modules are connected in series to form a string. A number of strings are then wired in parallel to form an array of modules. PV modules are mounted on structures that are either fixed, north-facing at a defined angle, or mounted to a single or double axis tracker to optimise electricity yield.

2.2 MOUNTING STRUCTURES

Various options exist for mounting structure foundations, which include cast/pre-cast concrete (shown in Figure 2), driven/rammed piles (Figure 4), or ground/earth screws mounting systems (Figure 4). Due to the presence of ephemeral washes within the PV footprint, driven/rammed piles and earth screws are the preferred mounting technology.



Figure 3: Cast Concrete Foundation



Figure 4: Driven/ Rammed Steel Pile



Figure 5: Ground Screw

The impact on agricultural resources and production of these options are considered to be the same, however concrete is least preferred due the effort required at a decommissioning phase in order to remove the concrete from the soil, and therefore its impact on the environment. The Bloemsmond 4 PV energy facility will therefore aim to make the most use of either driven/rammed piles, or ground/earth screws mounting systems, and only in certain instances resort to concrete foundations should geotechnical studies necessitate this.

2.3 AUXILIARY BUILDINGS

The auxiliary buildings will comprise of the following as a minimum:

- Control Building / Centre;
- Office;
- Warehouses;
- Canteen and Visitors Centre;
- Staff Lockers and Ablution; and
- Gate house / security offices.

The total area occupied by auxiliary buildings is approximately 1 ha (this area excludes the on-site substation, which is discussed separately).

2.4 WASTE MANAGEMENT

A summary of the waste management actions associated with Bloemsmond 4 are provided below. The waste management during construction and operation is discussed in more detail in the EMP and Waste Management plan appended.

2.4.1 Solid waste

Solid waste during the construction phase will mainly be in the form of construction material, excavated substrate and domestic solid waste. All waste will be disposed of in scavenger proof bins and temporarily placed in a central location for removal by the contractor. Any other waste and excess material will be removed once construction is complete and disposed of at a registered waste facility.

2.4.2 Sewerage

During the construction phase, chemical ablution facilities will be utilised. These ablution facilities will be maintained, serviced and emptied by an appointed contractor, who will dispose of the effluent at a licensed facility off site. Once construction is complete, the chemical ablution facilities will be removed from the study area. A conservancy tank which will be regularly emptied by a registered service provider will be installed at the Operations and Maintenance building.

2.5 HAZARDOUS SUBSTANCES

During the construction phase, use of the following hazardous substances is anticipated:

- Cement powder associated with the batching plant;
- Petrol/diesel for trucks/ cranes/ bulldozers; and
- Limited amounts of lubricants and transformer oils.

Temporary storage and disposal of hazardous waste will be done in compliance with relevant legislation and the EMP.

2.6 GRID CONNECTION AND CABLING⁹

Bloemsmond 4 will connect from the on-site substation to the Upington MTS via the Bloemsmond collector substation (this basic assessment process only includes the IPP portion of the on-site substation, while the remainder of the grid connection is being assessed as part of a separate basic assessment process).

The Bloemsmond 4 on site substation substation will be approximately 150m x 150m in size and feature a step-up transformer/s to transmit electricity.

A 100 MW_{AC} installation will require specific electrical components to meet the national grid code requirements in order to generate and supply electricity into the national grid.

The conversion from DC (modules) to AC is achieved by means of inverter stations. A single inverter station is connected to a number of solar arrays, and will be placed along the internal service roads for ease of access. A number of inverter stations will be installed for Bloemsmond 4 (up to maximum of

⁹ The Grid connection to the Upington MTS is being assessed as part of a separate Basic Assessment process, but is described here for context.

± 60 centralised inverters, or a maximum of ± 840 string inverters), each of which is connected to the on-site / facility substation.

Final placement of the inverter stations and on-site/facility substation will need to take ground conditions into consideration. Interconnecting electrical cabling will be trenched where practical and follow internal access roads to the greatest extent. Sensitive areas will consequently be avoided as far as possible, or alternatively, cables will be fastened above-ground to the mounting structures so as to avoid excessive excavation works and clearing of vegetation.

2.7 ACCESS ROUTES AND INTERNAL ROADS

The proposed project site is accessible via the major national road found in the broader study area, the N14, which connects Upington and Keimoes in a south-west direction.

- Preferred Access Road 1 (orange route in the figure below – Eastern Access Road Alternative) is the most technically and environmentally preferred access road. This route of ~7km in length connects the site via the N14 national road and runs along the eastern boundary of portion 14 of the farm Bloemsmond 455. The proposed access road utilizes a large section of an existing farm track which will reduce the environmental impact. The Eastern Access Road Alternative includes a link road which connects alternative 1 (east) & 2 (west) entrances off the N14 to one another (i.e. creates a link to the access road authorised for Bloemsmond 1 and 2.
- Alternative 2 Site Access (red & yellow) follows an existing farm access road; the red section has been authorised under the Bloemsmond 1 and 2 Environmental Authorisations. The route traverses the farm Bloemsmond West RE/623, the route will pass along the western side of the smaller vineyards that are located on Farm Bloemsmond-Wes RE/623. The access road will run northwards adjacent to Bloemsmond 1 and continue northwards for approximately 2km to gain access to Bloemsmond 4.



Figure 6: Access Routes to Bloemsmond 4 (Alternative 1 along the Eastern Boundary is the preferred alternative).

The internal road network of Bloemsmond 4 will be gravelled roads, 4 – 5m in width, around the solar array periphery. Roads located in-between the solar modules will be un-surfaced tracks to be used for maintenance and cleaning of solar PV panels

A detailed transport and traffic plan has been compiled and forms part of this Basic Assessment Process.. Precautionary measures will be taken to mitigate the risk of ground disturbances where access roads will be constructed. Special attention will be given to drainage, water flow and erosion by applying appropriate building methods.

2.8 PROJECT NEED AND DESIRABILITY

In keeping with the requirements of an integrated Environmental Impact process, the DEA&DP¹⁰ *Guidelines on Need and Desirability (2010 & 2011)* were referenced to provide the following estimation of the activity in relation to the broader societal needs. The concept of need and desirability can be explained in terms of its two components, where *need* refers to *time* and *desirability* refers to *place*. Questions pertaining to these components are answered in the Sections below.

¹⁰ The Western Cape Provincial guidelines on Need and Desirability were considered in the absence of National and Northern Cape Guidelines.

The section above considers the overall need for alternative, so-called 'green energy' in light of the known environmental burdens associated with the impact of coal power generation through which most of our country's electricity is currently being generated. Associated aspects such as air pollution, water use and carbon tax are discussed in order to further explain the need and desirability for 'green energy' projects in general.

2.8.1 Feasibility consideration

The commercial feasibility for the proposed 100MW_{AC} Bloemsmond 4 to be built on private land near Keimoes, has been informed by its contextual location, and economic, social and environmental impacts and influence. The project has gathered sufficient information and conducted studies of the site and the region to make qualified and reliable assumptions on the project's various impacts.

2.8.2 Solar Resource & Energy Production

The arid climate experienced in the Northern Cape lends itself to the availability of high levels of solar energy. Considering the steady nature of the solar radiation at the Bloemsmond 4 site, the resource is sufficient to guarantee a positive return on investment.

2.8.3 Solar Farm & Grid Connection

Among the outstanding characteristics of the Bloemsmond 4 site is its exceptionally flat nature, sufficient medium-low sensitivity environments (the proposed layout plan was able to avoid all areas with a high sensitivity) and accessible location, facilitating the delivery of bulky PV panel infrastructure, and the construction and assembly process. The proximity of the site to the N14 decreases the impact on secondary roads and natural habitat from the traffic going to and from Bloemsmond 4 during construction and operations. The close proximity of the existing Eskom Upington MTS also allows for connection via a relatively short distribution line. As the site is not used for intensive agricultural purposes, Bloemsmond 4 will not significantly interfere with the agricultural productivity of the area.

2.8.4 Social impact

Please refer to the Social Impact Assessment Report in **Annexure E7** for a detailed description of the social environment. The Northern Cape region is economically challenged due to its arid climate, challenging agricultural conditions, lack of water and limited natural resources (away from the Orange River). The local economy, mainly supported by limited agriculture, simply isn't enough to accommodate the high level of unemployment.

Private sector development is seen to offer opportunities to access Enterprise Development funds of the main mining groups. This can contribute to entrepreneurial activities linked to their supply chain. The same applies to the investment, in terms of employment opportunities and entrepreneurial activities, associated with renewable energy projects.

Power generation is one of the rare growth opportunities for the Northern Cape (and even more so within the REDZ such as where Bloemsmond 4 is proposed) due to the high solar irradiation levels and its strategic position relative to the National Transmission Network. This setup creates unprecedented growth opportunities for the area and the establishment of a renewable energy project is considered important to diversify and complement the economic development of the region.

2.8.5 Employment & Skills Transfer

The benefits of renewable energy facilities to local regions are not confined to the initial investment in the project. They also provide a reliable and on-going income for landowners and municipality, creating direct employment opportunities for locals, as well as flow-on employment for local businesses through provision of products and services to the project and its employees.

Bloemsmond 4 will have a positive impact on local employment. During the estimated 18 month construction phase, the project will employ approximately 300 – 400 individuals of various qualifications. The majority will be provided by the local labour market. During operations, Bloemsmond 4 is expected to have up to 60 employment opportunities ranging from security staff to administration and artisans. Due to the fact that there is limited local skilled labour in the field of renewable energy, the employment structure will likely consist of local and outside capacity. To guarantee successful operations over the lifetime of the investment, Bloemsmond 4 will likely use the skills of outside labour to cross-train local specialists. This cross training and skills development will take place especially in the area of technical maintenance and administration.

2.8.6 Need (time)

Is the land use considered within the timeframe intended by the existing approved Spatial Development Framework (SDF)? (I.e. is the proposed development in line with the projects and programmes identified as priorities within the credible IDP?)

Yes, the employment of renewable energy technology / development has a spatial strategic place in the Kai !Garib Municipality SDF while the need for a policy on the development of sustainable solar energy facilities has been identified as Key Development Priority / Project.

Should the development occur here at this point in time?

Yes, the proposed Bloemsmond 4 solar facility is to be located outside the Upington and Keimoes Urban Edges urban edge, but within a legislated REDZ, and would promote diversification to the local economy as well as serve as a catalyst for further expansion in the stream of sustainable renewable energy development within these REDZ (identified as a priority development strategy IDP & SDF). There are currently 4 renewable energy developments completed or currently under construction in very close proximity to the proposed Bloemsmond 4.

Does the community / area need the activity and the associated land use concerned?

The Kai Garib Municipality identified the opportunity for a renewable energy project through their SDF and IDP processes, which include public participation. The proposed renewable energy development will allow for a diversification of employment, skills and contribute to the potential development of small business associated with its construction, operation and maintenance activities.

The proposed solar facility will contribute electricity to the constrained Northern Cape and National electrical network, contributing to a provincial and national need. Bloemsmond 4 has been designed in such a way so as to avoid or minimise potential negative impacts of the local environment while enhancing potential positive impacts, locally and regionally. The social specialist undertook interviews with various municipal officials as part of the Social Impact Assessment. The proposed development was strongly supported by Mr McKay and Mr Clarke, the Director of Planning and Head of Engineering Services respectively at the Kai !Garib Municipality.

Are the necessary services with adequate capacity currently available?

Some existing, some new. Bloemsmond 4 requires the installation of an overhead power line to connect to the existing Eskom MTS Upington Substation via the Bloemsmond collector substation (feed into the national grid system), as well as an access road to the development site from the N14 (following existing farm tracks as far as practically possible). The cost of supplying the new infrastructure will be covered by the Applicant, and the impacts thereof have been assessed in this environmental process.

The water required for the construction and operation of Bloemsmond 4 will be sourced from the Kai !Garib Municipality and will be supplemented by stored rainwater (proof of confirmation of availability will of water is attached in annexure G6). The applicant may at a later stage consider the utilisation of groundwater to supplement this supply, this will however be subject to approval in terms of the National Water Act.

Construction waste (general waste) will be disposed of at the existing landfill sites – the municipality has confirmed that there is sufficient capacity at their existing landfill – please refer to Annexure G6. Defunct and damaged panels identified during construction will be returned to the supplier for recycling and/or disposal.

Is this development provided for in the infrastructure planning of the municipality?

Yes. Attracting private investment and the employment opportunities associated with renewable energy development are identified as priority strategies to create sustainable urban and rural settlements.

Is this project part of a national programme to address an issue of national concern or importance?

Yes. In order to meet the increasing power demand within South Africa, Eskom has set a target of 30% of all new power generation to be derived from independent power producers (IPPs). The Applicant is one such IPP which intends to generate up to 100MW_{AC} of electricity from the proposed Bloemsmond 4, for input into the national grid (via the the Bloemsmond collector substation to the existing Upington MTS Substation). The proposed Bloemsmond 4 is also situated within a legislated REDZ.

2.8.7 Desirability (place)

Is the development the best practicable environmental option for this land / site?

The target property is outside the Upington and Keimoes Urban Edge, within a legislated REDZ and as such will unlikely be considered for an alternative land use such as urban development. The property has a poor agricultural potential due to the arid climate and other limiting factors. These factors have rendered the property vacant with limited land use option alternatives.

Would the approval of this application compromise the integrity of the existing approved and credible municipal IDP and SDF?

No. According to the IDP, attracting Renewable Energy Investment is seen as an IDP Strategy and economic driver to alleviate unemployment and poverty and “to ensure sustainable economic and social transformation in the District”. The performance of which would be reflected in the development of a Renewable Energy Strategy and Policy for the District (IDP, 2012-2018). The IDP furthermore specifically promotes socio-economic development, SMME’s, job creation and private sector investment and identifies solar energy as a growth opportunity within the local economy.

Would the approval of this application compromise the integrity of the existing approved environmental management priorities for the area?

Unlikely. According to the national vegetation map (Mucina & Rutherford 2012), the solar development site lies entirely within a vegetation type that is classified as Least Threatened, namely Bushmanland Arid Grassland and Kalahari Karroid Shrubland (ecosystems that cover most of their original extent and which are mostly undamaged, healthy and functioning). Considering the extent of this relatively intact ecosystem type, and the fact that the site is not highly sensitive (there are no unique, threatened or otherwise unique habitats present which are not widely available in the wider landscape), it can withstand some loss of natural area through development.

Do location factors favour this land use at this place?

Yes. The Northern Cape region has been identified as being one of the most viable areas for solar energy generation due to the following factors:

- Excellent solar radiation (compared to other regions);
- Close to existing main transport routes and access points;
- Close to connection points to the local and national electrical grid; and
- Outside Critical Biodiversity areas.

The proposed site is furthermore situated within a legislated REDZ and as such has been subjected to a detailed SEA in which highly sensitive landscapes were already excluded from these areas.

The ecological sensitive areas on and surrounding the solar site have informed the optimal location and layout for the proposed solar project, with minimal impact to the receiving environment, subject to implementation of mitigation measures.

How will the activity or the land use associated with the activity applied for, impact on sensitive natural and cultural areas?

The alternatives considered for the solar development have been iteratively designed and informed by various investigations and assessments that considered both the natural and cultural landscapes. The natural and cultural sensitive areas have been identified and where possible, avoided to prevent negative impacts on such areas.

How will the development impact on people's health and wellbeing?

The site is located outside of the Upington and Keimoes Urban Edge and as a result is unlikely to impact negatively on the community's health and wellbeing. The closest populated settlement is situated on Kanoneiland, situated more than 8km from the site.

Will the proposed activity or the land use associated with the activity applied for, result in unacceptable opportunity costs?

Unlikely. The next best land use alternative to the solar facility is limited agriculture (the status-quo). However, the proposed solar development site does not have any significant agricultural value and has not been utilised for any intensive agricultural purposes. The carrying capacity of the site is too low to generate noteworthy financial benefit from agricultural activities. The development of the proposed solar facility would constitute the loss of less than 268ha of the overall property. The economic benefits and opportunities that the proposed solar development holds for the landowner and the local economy of the municipal area cannot be recovered from the current or potential agricultural activities.

The opportunity costs in terms of the water-use requirements of Bloemsmond 4 are within acceptable bounds if one considers the minimal demand on the resources.

Will the proposed land use result in unacceptable cumulative impacts?

Unlikely. Due to the fact that the Northern Cape, and specifically sites within the legislated REDZ have been identified as an area with high potential for renewable energy generation: solar irradiation and availability of vast tracts of land with low sensitivity; there are a number of on-going applications in the region already. The potential for further, future solar developments in the area cannot be discounted (as many have already been approved or are in progress). However these will have synergistic benefits for the economy and growth of the area, while the contribution to cumulative habitat loss in the area associated with this and potential future solar development would be relatively small in relation to the land resources available, with low impacts restricted to the local area.

2.9 SITE SELECTION PROCESS

The site selection process followed a two stage approach; firstly, to select the property for the proposed development (Portion 5 and Portion 14 of the Farm Bloemsmond 455), and secondly, to select the footprint of the proposed development within the farm portion. A site selection matrix supplied by the applicant is attached in **Annexure E11**.

2.9.1 Property Selection

2.9.1.1 Proximity to towns with a need for socio-economic upliftment

The Bloemsmond 4 site is situated approximately 30 km south west of Upington in the Northern Cape Province. The Kai! Garib Local Municipality is typically masked with high rates of unemployment and poverty, which is largely the case throughout the Northern Cape Province. To this extent, Bloemsmond 4 is situated in close proximity to the towns of Upington, Kleimoes and Kakamas. Consequently, local labour would be easy to source, which fits in well with the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) economic development criteria for socio-economic upliftment. Currently, a large proportion of local labour is used in the mining and agricultural industry. There are several negatives related to agricultural employment however; that it is very seasonal and it is not always in close proximity to the homes of farm workers, forcing workers to travel large distances on a daily basis to reach their place of employment. Over the years, employment in the mining sector has shown to be very volatile. The Northern Cape has been identified as a node for the development and construction of solar PV within South Africa and the locality of the Bloemsmond 4 site would therefore present new opportunities for local skilled labour through previous work experience on surrounding preferred bidder plants.

2.9.1.2 Access to grid

The new Upington MTS is located in close proximity to the Bloemsmond 4 site. The preferred option connects directly into the proposed new Eskom Upington MTS Substation, via the proposed Bloemsmond Collector Substation. Ease of access into the Eskom electricity grid is vital to the viability of a solar PV facility. Projects that are in close proximity to a connection point and/or demand centre are favourable, and reduce the losses associated with power transmission. In addition, Eskom's '2040 Transmission Network Study' has drawn on various scenarios to determine the grid's development requirements, as well as to identify critical power corridors for future strategic development, of which the Northern corridor is one of these. The national power corridors consisting of five transmission power corridors of 100 km in width have been gazetted by the DEA following the outcomes of the SEA, which aimed to identify environmentally acceptable routes over which long-term EIA approvals can be secured. The Bloemsmond 4 site falls into the Northern corridor.

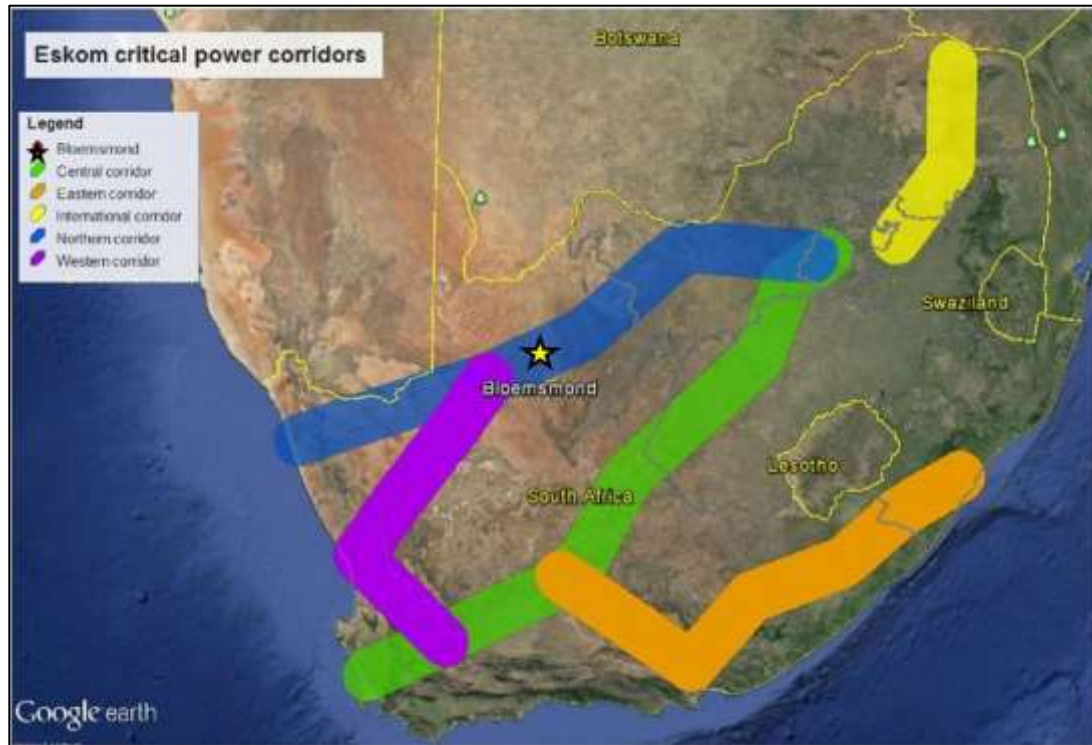


Figure 7: Eskom “Critical Power” Corridors. The Bloemsmond 4 site is within the northern corridor as shown by the yellow star.

2.9.1.3 Need and Desirability of the Development at the preferred site location

The Upington area has been ear-marked as a hub for the development of solar energy projects due to the viability of the solar resource for the area, and this area is included in the solar corridor which has been identified by the Northern Cape Spatial Development Framework. The overarching objective for the solar energy facility is to maximise electricity production through exposure to the solar resource, while minimising infrastructure, operational and maintenance costs, as well as social and environmental impacts. From a regional site selection perspective, this region is considered to be preferred for solar energy development by virtue of its annual solar irradiation values. From a local perspective, the Site has specifically been identified as being highly desirable for the development of a solar PV facility due to its suitable topography (i.e. in terms of slope and local topography), site access (i.e. to facilitate the movement of machinery during the construction phase), land availability, the extent of the site, and enabling optimal placement of the infrastructure considering potential environmental sensitivities or technical constraints, as well as the consolidation of renewable projects within an already identified node.

2.9.1.4 REDZ

The proposed Bloemsmond 4 site falls within the gazetted geographical areas / focus area most suitable for the rollout of the development of solar energy projects (called “Upington Solar priority area”) within the Northern Cape Province.

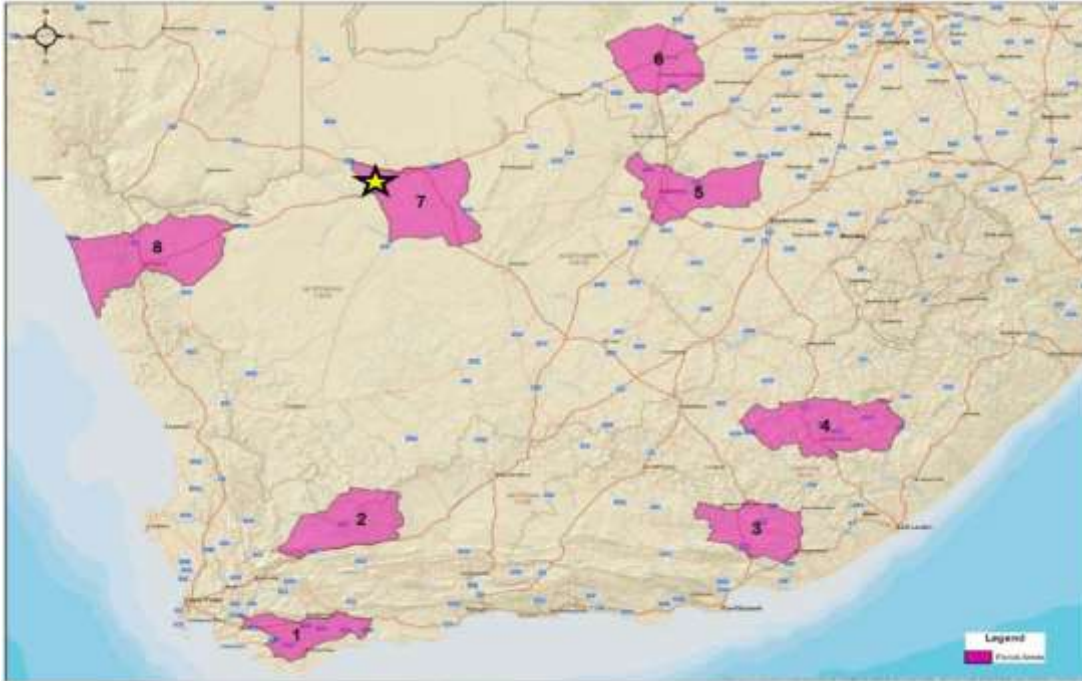


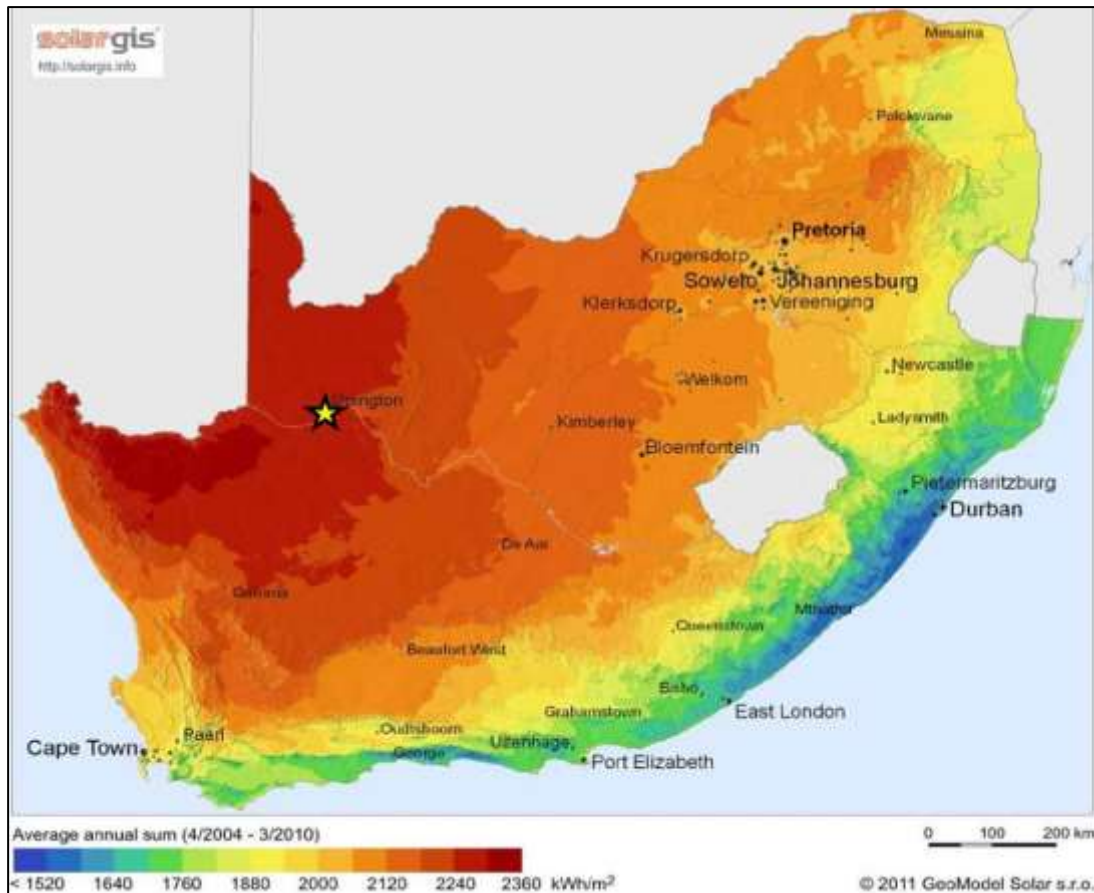
Figure 8: Renewable Energy Development Zones (CSIR 2014); Bloemsmond 4 (shown by the yellow star) falls within REDZ 7.

2.9.1.5 Agricultural Potential

The unfavourable climate of the Kalahari environment greatly decreases agricultural potential. The area is known to be an agricultural-hub but Portion 5 and Portion 14 of the Farm Bloemsmond 455 are located too far from the Orange River and its fertile banks to ever be considered for high intensity grazing and/or cultivation practices. The development does not encroach on land that is currently being used for grape production which is crucial for the economy of South Africa and the Upington area.

2.9.1.6 The Solar Irradiation

The economic viability of a solar facility is directly dependent on the annual direct solar irradiation values. The Northern Cape receives the highest average daily direct normal irradiation (DNI) in South Africa. In addition, Upington exhibits some of the best solar irradiation in South Africa, and the world. Global horizontal irradiation (GHI) for the Upington region varies between 2250 and 2300 kWh/m²/annum. The GHI for the Bloemsmond 4 site is in the region of approximately 2278 kWh/m²/annum. The high irradiation level is an important factor in a highly competitive bidding environment under REIPPPP, the economic viability of a project is a critical success factor.



2.9.1.7 Proximity to access road for transportation of material and components

The proximity of the site to the N14 decreases the impact on secondary roads from traffic during the construction and operation phases. As material and components would need to be transported to the Bloemsmond 4 site during the construction phase of the project, the accessibility of the Bloemsmond 4 site was a key factor in determining the viability of the project, particularly taking transportation costs (direct and indirect) into consideration and the impact of this on project economics and therefore the ability to submit a competitive bid under the Department of Energy's (DoE) REIPPPP.

2.9.1.8 Upington airport

The Upington airport is located approximately 28km to the south-west of the Bloemsmond 4 site, and therefore will not pose any threat to the aviation industry.

2.9.1.9 Same landowner

Bloemsmond Solar 4 (Pty) Ltd has an established relationship with the landowner of Portions 5 and 14 of Farm Bloemsmond due to previously undertaking development studies for two other PV facilities on the same land, and thus negotiating a new contract with the landowner was relatively easy. Based on the above list of findings it was decided that the proposed site would be suitable for such a development. After considerations to the farm extents, it is believed that the Bloemsmond 4 site could accommodate an additional 100 MW contracted capacity permitted under the DoE's Request For Proposals, and furthermore, that all this power would be able to be absorbed into the national grid under stipulated contingency conditions.

2.9.2 Footprint selection

The selection of the proposed study area within Portion 5 and Portion 14 of Farm Bloemsmond 455 followed a risk adverse, bottom up approach in order to ensure that the impacts of the proposed

developments can be avoided as far as possible. This avoidance approach reduces the degree of mitigation required in order ensure that potential environmental impacts are within acceptable levels.

This approach was achieved by means of appointing the ecology and heritage experts prior to the initiation of the formal environmental process to identify sensitive features for the property. The following sensitive features were identified by the participating specialists:

- Watercourses (including both, major and ephemeral washes)
- Pans
- Koppies
- Archaeological sites

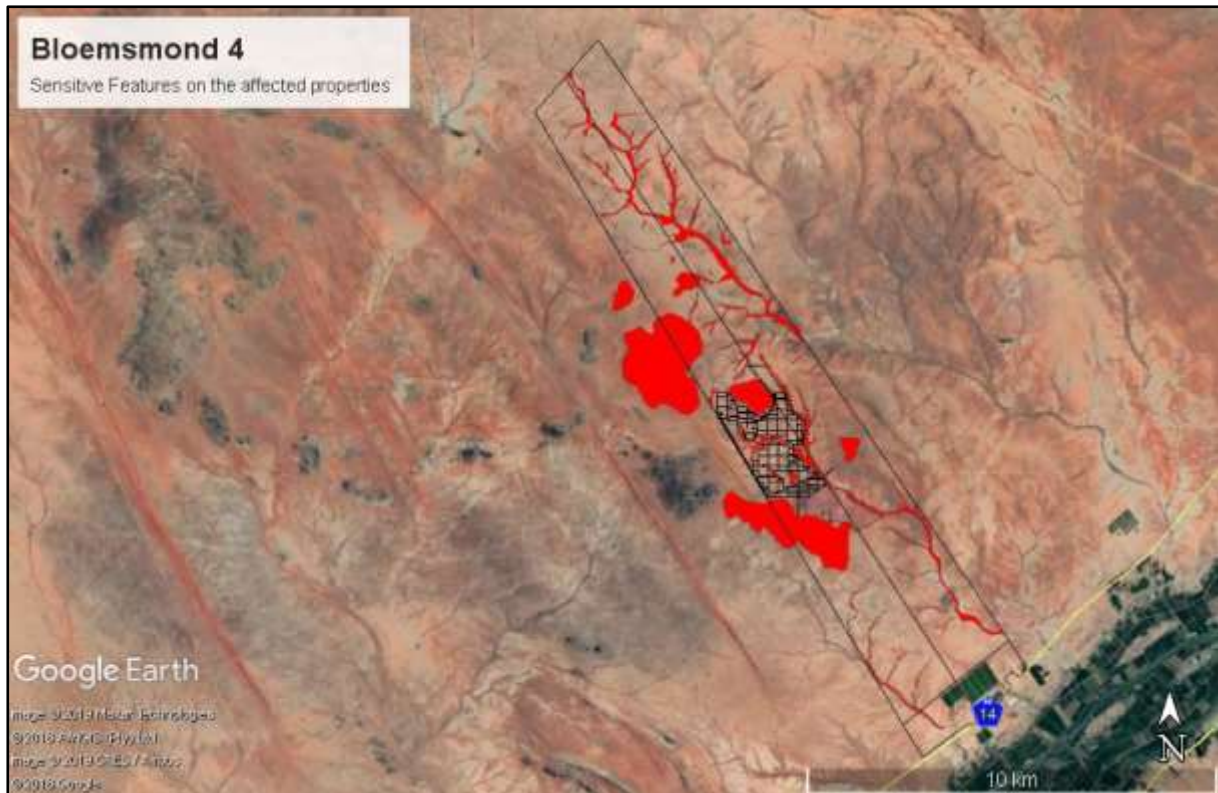


Figure 9: Sensitive features on Portion 5 and Portion 14 of the Farm Bloemsmond 455 as identified by the participating specialists. These include low, medium and high sensitivity features. Please refer to the detailed sensitivity plans attached in **Appendix B**.

The initial study area (including alternative footprints) was then developed to utilise areas where the least sensitive features occurred. The specialists were then engaged in detail throughout the layout development phase to ensure that the preferred alternative resulted in the lowest overall impact. See the section below for a discussion on this process.

2.10 CONSIDERATION OF ALTERNATIVES

Bloemsmond 4 is to consist of solar PV technology with fixed, single or double axis tracking mounting structures, with a net generation (contracted) capacity of 100MW_{AC} as well as associated infrastructure, which will include:

- On-site switching-station / substation;
- Auxiliary buildings (gate-house and security, control centre, office, warehouse, canteen and visitors centre, staff lockers etc.);
- Inverter-stations, transformers and internal electrical reticulation (underground cabling);
- Access and internal road network;

- Laydown area;
- Bloemsmond 4 will connect from the on-site substation to the Upington MTS via the Bloemsmond collector substation (this Basic Assessment process only includes the IPP portion of the on-site substation, while the remainder of the grid connection is being assessed as part of a separate Basic Assessment process).
- Rainwater tanks; and
- Perimeter fencing and security infrastructure.

A number of alternatives, including layout and technological alternatives were considered for the proposed Bloemsmond 4 facility. The consideration of these alternatives are detailed below as summarised from the technical development report produced by AEP.

2.10.1 Layout Alternatives

It is customary to develop the final/detailed construction layout of the facility only once an Independent Power Producer (IPP) is awarded a successful bid under the REIPPPP, after which major contracts are negotiated and final equipment suppliers identified. However, for the purpose of this Basic Assessment Report in accordance with the minimum requirements prescribed by the DEA, two alternative layouts were identified. The following section elaborates on the layout options for the Bloemsmond 4 solar facility.

2.10.1.1 Initial assessment area

An initial/ conceptual area of ± 366 ha was identified during the initiation phase of the EIA (BAR) for Bloemsmond 4. The area is located in the south eastern corner of Bloemsmond Farm 455 Portion 14. The figure below depicts the 366 ha initial/conceptual area outlined in blue.

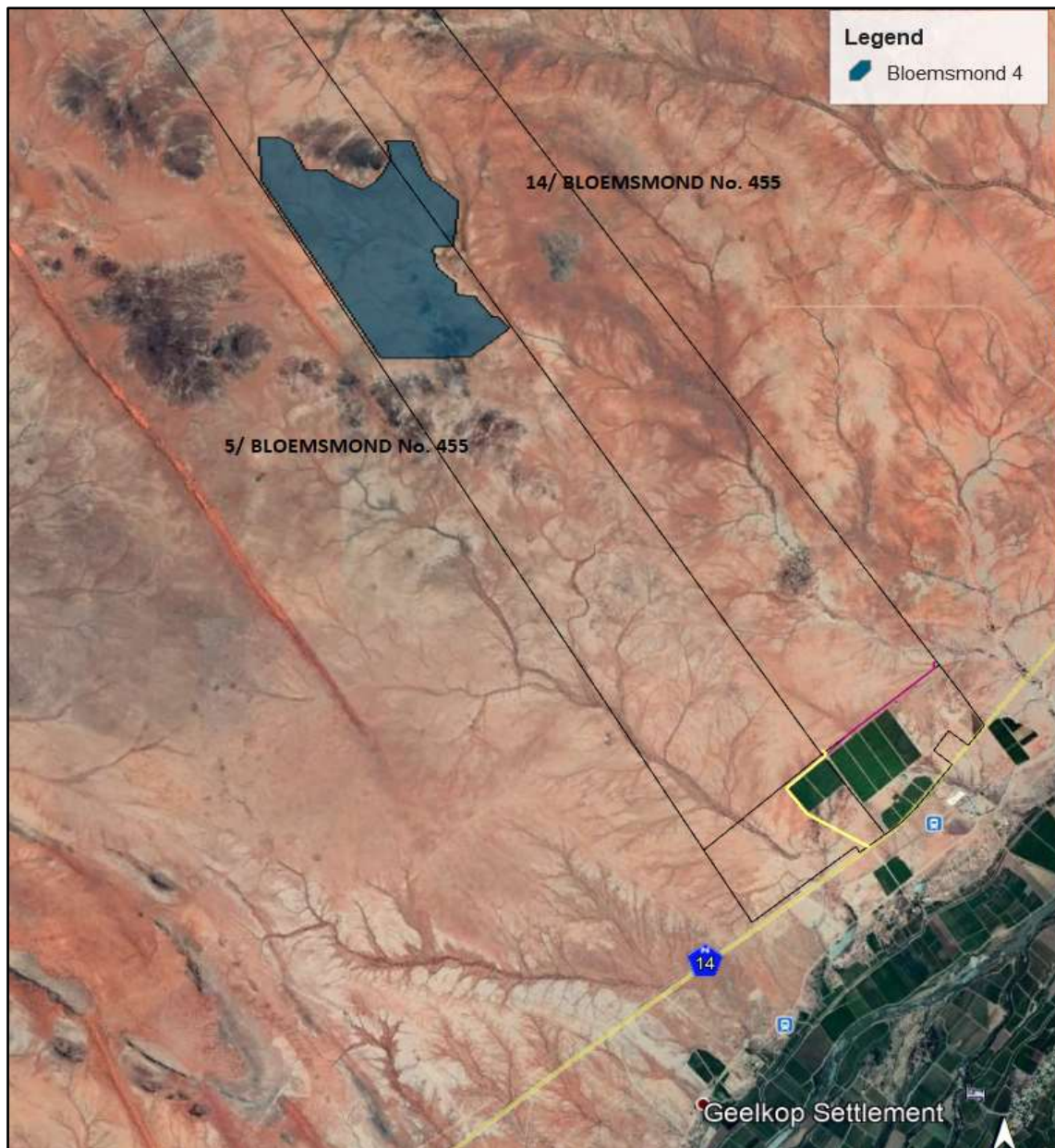


Figure 10: Initial Assessment Area for Bloemsmond 4.

This initial/ conceptual area only considered the already authorised solar facilities on the properties, namely AEP Bloemsmond 1 (DEA 14/12/16/3/3/2/815) and AEP Bloemsmond 2 (DEA 14/12/16/3/3/2/816), the existing Eskom 400kV line that runs through both properties, as well as the area under assessment as part of another EIA application (shown in light purple in the figure below).

The initial/ conceptual area did not consider any environmental sensitive areas (to be identified by the various specialist studies). This initial / conceptual area was driven primarily by its proximity to the N14 access road as well as reduced OHL distance to connect into the Upington MTS, located ± 10.5 km to the east of the site.

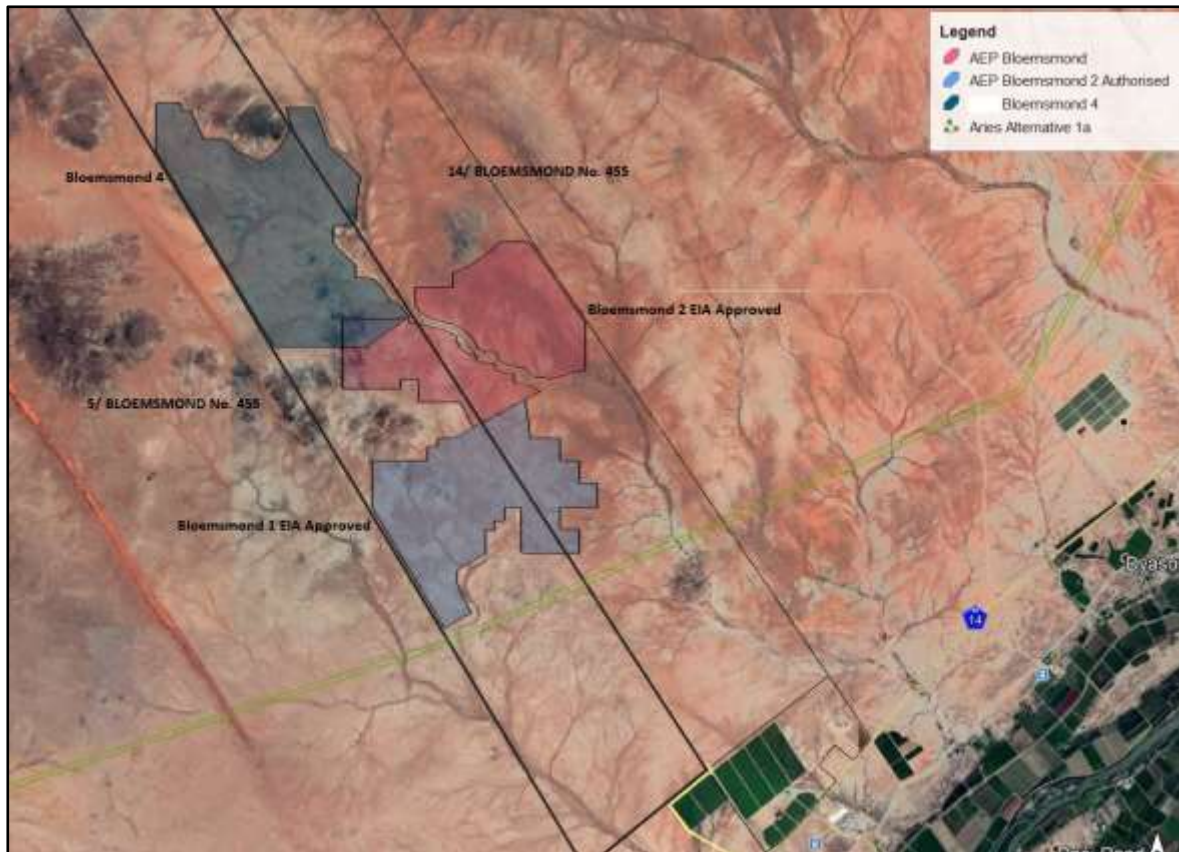


Figure 11: Approved projects on Bloemsmond Farm 455 Portions 5 & 14¹¹.

2.10.1.2 Site sensitivity screening

Following the identification of the initial/ conceptual area, various specialists namely ecological, aquatic and avifaunal were appointed to assist in the site selection process in the form of mapping the sensitive area of the initial/ conceptual area following a site visit. This sensitivity files were then used to determine the location of the preferred layout alternative during the planning and design phase, which aimed to avoid all areas with a medium – high, high and very high sensitivity as indicated in Figure 12 below.

¹¹ As can be noted from this image, there is a minor conflict between the proposed Bloemsmond 4 and the Authorised Bloemsmond 2. This conflict will be addressed through the detail design currently underway.

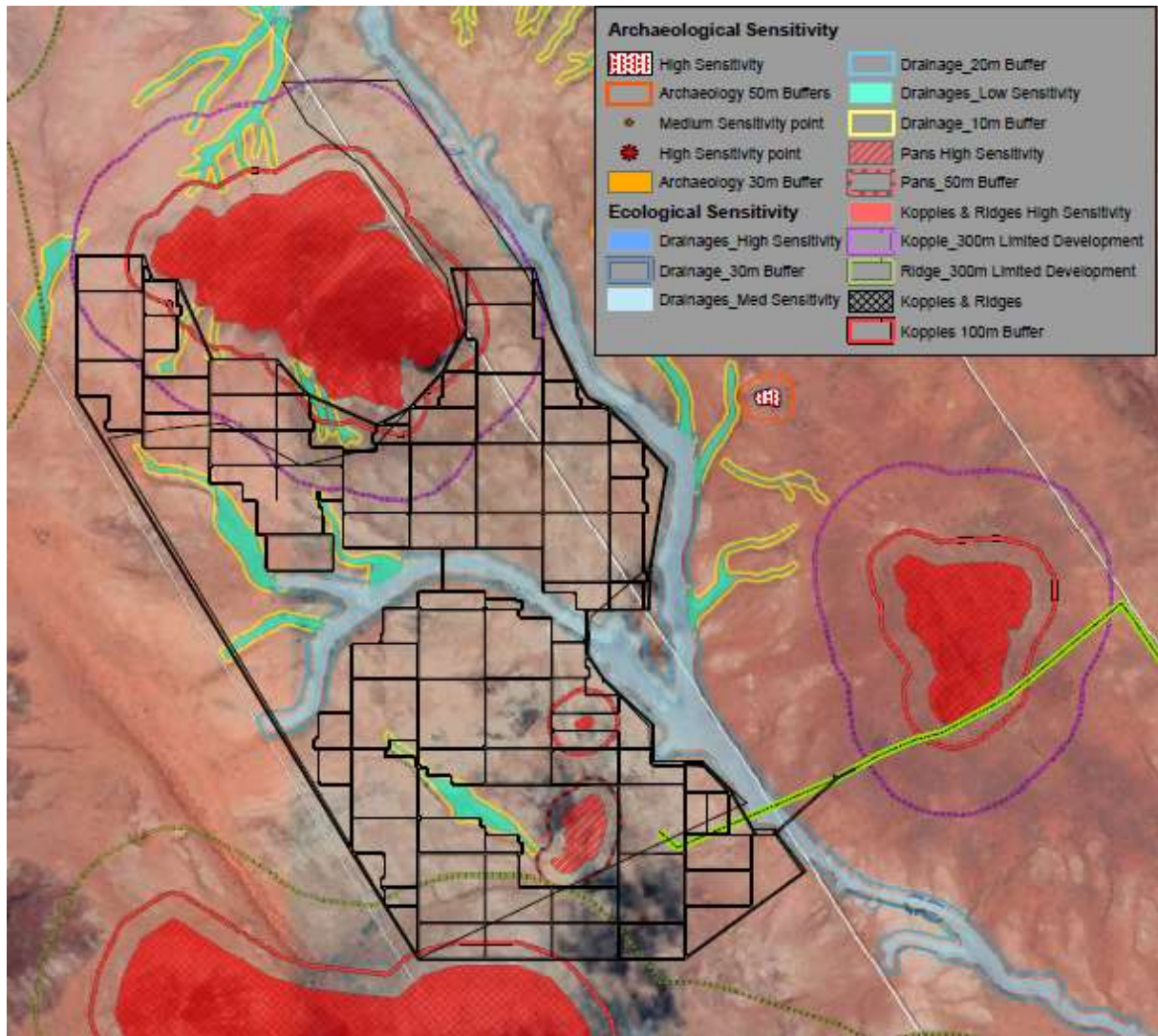


Figure 12: Ecological Sensitivity for Bloemsmond 4 located on Portion 14 of the Farm Bloemsmond 455. Please refer to the detailed sensitivity plan attached in **Appendix B**.

2.10.1.3 Layout alternative 1 (preferred)

The preferred layout alternative considered during the preliminary planning phase of the EIA is depicted in Figure 3 above. Layout Alternative 1 (Preferred) constitutes a preliminary layout area within the initial/ conceptual area, however this area has been decreased due to the very high sensitivity pans, watercourses, heritage areas and koppies identified by the respective specialists during the assessment of the initial/ conceptual area. Layout Alternative 1 predominantly occupies only Low and Low to Medium sensitivity areas. The detailed layout plan for the preferred alternative is attached in **Appendix D**.

2.10.1.4 Layout alternative 2

In accordance with the minimum requirements prescribed by the DEA, a second layout option was identified. Layout Alternative 2 is shown in the figure below. Layout Alternative 2 is located towards the northern section of Portion 5 and Portion 14 of the Farm Bloemsmond 455. This alternative is considered the least preferred due to its High sensitivity area due to several watercourses within the site boundary combined with its distance from the main N14 access road and the Upington MTS.

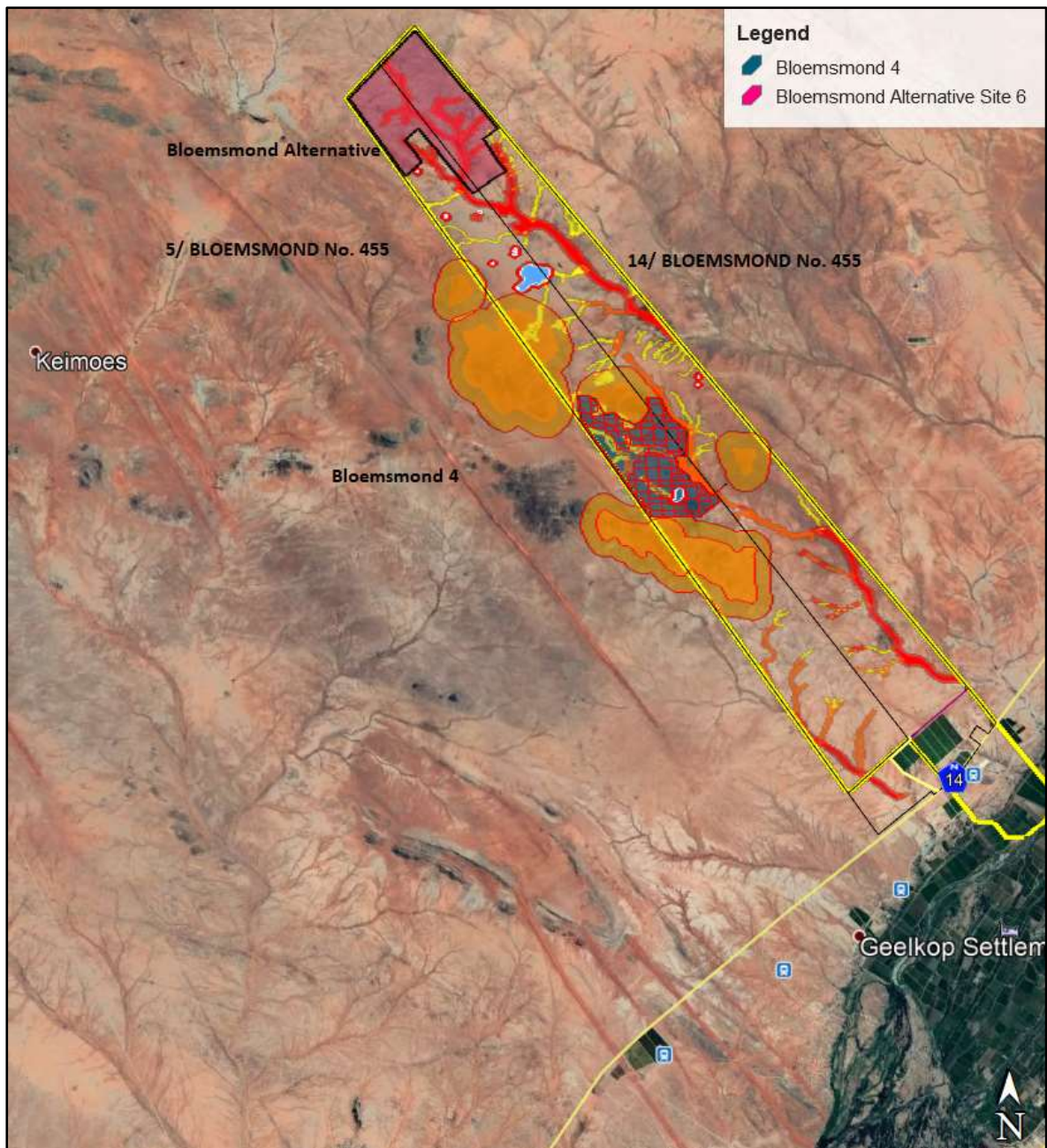


Figure 13: Layout Alternative 2.

Layout alternative was eliminated from this environmental process for the following reasons:

- Proximity of higher sensitivity watercourses;
- Higher visual exposure;
- Significant length of access road and grid connection resulting in further fragmentation and additional impacts.

2.10.2 Grid Connection Alternatives

The grid connection for Bloemsmond 4 is being assessed as part of a separate environmental process, and as such, the alternative alignments are not discussed here.

2.10.3 Access Road Alternatives

The internal road network of Bloemsmond 4 will be gravelled roads, 4 – 6m in width, around the solar array periphery. Roads located in-between the solar modules will be un-surfaced tracks to be used for maintenance and cleaning of solar PV panels.

Precautionary measures will be taken to mitigate the risk of ground disturbances where access roads will be constructed. Special attention will be given to drainage, water flow and erosion by applying appropriate building methods and implementation of the Stormwater Management Plan.

A detailed traffic impact assessment has been undertaken as part of this environmental process. The preferred access in this environmental process is Eastern Alternative Access Road, as it is shorter, situated outside of high sensitivity koppies and watercoursed and provides easy access to the proposed laydown area. The main access follows existing farm roads to a large degree. These existing roads will be upgraded.

The proposed Bloemsmond 4 site is accessible via the major national road found in the broader study area, the N14, which connects Upington and Keimoes in a south-west direction.

The eastern access (Preferred) (orange route in the figure below) is the most technically and environmentally preferred access road. This route of ~7km in length connects the Bloemsmond 4 site via the N14 national road and runs along the eastern boundary of Portion 14 of the Farm Bloemsmond 455. The proposed access road utilises a large section of an existing farm track which will reduce the environmental impact. It must be noted that the eastern access alternative (preferred) includes a link on portion from the authorised access for Bloemsmond 1 & 2 to the eastern boundary along the southern boundary of Portion 14 Farm Bloemsmond 455. This is to allow for optimisation of access, depending on which, and how many of the Bloemsmond Projects reach the construction phase.

Alternative site access (red & yellow) largely follows an existing farm access road; the red section has been authorised under the Bloemsmond 1 and 2 Environmental Authorisations. The route traverses the farm Bloemsmond West RE/623, the route will pass along the western side of the smaller vineyards that are located on Farm Bloemsmond-Wes RE/623. The access road will run northwards adjacent to Bloemsmond 2. Once the proposed access road has bypassed Bloemsmond 2 it will take a 90° turn in an easterly direction and continue up to Bloemsmond 4.



Figure 14: Access Routes to Bloemsmond 4.

2.10.4 The no-go alternative

The no-go Alternative (or status quo) proposes that Bloemsmond 4 not go ahead and that the area in proximity to the Eskom Upington MTS remain undeveloped as it is currently. The land on which the proposed project is proposed is currently vacant. It is currently used for limited game grazing activities, however due to a combination of water scarcity and extreme climatic conditions, it has no potential for irrigated crop cultivation (this has been confirmed by the Agricultural Specialist in his report attached in **Annexure E3**). The area in question is also considered too small to generate noteworthy financial benefit from agricultural activities due to its low carrying capacity.

The solar-power generation potential of the Northern Cape area, particularly in proximity to the existing and proposed substations, is significant and will persist should the no-go alternative occur.

The no-go alternative will limit the potential associated with the land and the area as a whole for ensuring energy security locally, as well as the meeting of renewable energy targets on a provincial and national scale. Should the no-go alternative be considered, the positive impacts associated with

Bloemsmond 4 (increased revenue for the farmer, economic investment, local employment and generation of electricity from a renewable resource) will not be realised.

The no-go alternative is thus not considered a favourable option in light of the benefits associated with the proposed Bloemsmond 4, however it will be used as a baseline from which to determine the level and significance of potential impacts associated with the proposed Bloemsmond 4.

Furthermore, the preferred layout alternative (Layout Alternative 1) and Eastern Access Road Alternative has a marginally lower visual exposure than the other alternatives considered.

2.10.5 Comparison of alternatives

The table below reflects the key environmental advantages and disadvantages of the two layout and four grid connection alternatives including the identification of the preferred alternatives in each case.

Table 4: Comparison of Advantages and Disadvantages of Layout and Access Road Alternatives.

| Alternative | Preference | Reasons (incl. potential issues) |
|---------------------------------|-----------------|---|
| PV LAYOUT ALTERNATIVES | | |
| Alternative 1 | Preferred | <ul style="list-style-type: none"> - This is seen as the preferred alternative as the footprint is in closer proximity to roads and existing PV projects where existing disturbance would decrease the value of the affected habitat. - The landscape fragmentation of this alternative is lower than that of Layout Alternative 2 - Shorter Grid Connection - Marginally lower visual exposure |
| Alternative 2 | Less Preferred | <ul style="list-style-type: none"> - Layout Alternative 2 is considered marginally less preferred as it is further away from existing disturbance sources and as such would likely result in the loss of habitat that is of somewhat greater value than Layout Alternative 1. - Longer Grid connection - Longer Access Road - Higher visual exposure |
| Access Road Alternatives | | |
| Eastern Alternative | Preferred | <ul style="list-style-type: none"> - Lower number of watercourse crossings - Does not cross any high sensitivity watercourses - Shorter - Closer to other disturbed areas - Does not cross any highly sensitive koppies (lower avifaunal impact) |
| Western Alternative | Least Preferred | <ul style="list-style-type: none"> - Higher number of watercourse crossings - Crosses a number of high sensitivity watercourses - Longer - Further away from disturbed areas - Crosses a high sensitivity koppie (higher avifaunal impact) |

As can be seen in the table above, there is an environmental preference for Layout Alternative 1 due to its lower impact on landscape connectivity and the fact that it borders highly transformed habitat associated with the authorised PV facilities. The preferred access road option is the Eastern Alternative due to its lower overall impact.

2.11 PROJECT PROGRAMME AND TIMELINES

As mentioned previously Bloemsmond 4 is intended to be bid into the REIPPPP. The programme has definite and stringent timelines that the project needs to meet. Note that the DoE has not yet released

the exact dates of the bidding schedules, so the implementation schedule below is based on the best available information we have at this time and is subject to change.

Table 5: Preliminary implementation schedule.

| | Description | Timeline |
|---|--|-----------------------|
| 1 | Expected REIPPPP submission date (5th round) | First Quarter of 2020 |
| 2 | Preferred bidders selected | Third Quarter 2020 |
| 3 | Finalisation of agreements | First Quarter 2021 |
| 4 | Procurement of infrastructure | Second Quarter 2021 |
| 5 | Construction | 2021 - 2022 |
| 6 | Commissioning | 2022 |

The table above clearly depicts the dependence of the project on the REIPPPP's timelines. Any delay or acceleration within the REIPPPP will have a corresponding effect on the timelines of the projects. Also, as mentioned, no official public submission date for Round 5 has been communicated by the DoE.

NOTE: Bloemsmond 4 intends submitting their bid during the 5th bidding window or thereafter if unsuccessful in immediate bidding rounds.

3. LEGISLATIVE AND POLICY FRAMEWORK

The legislation that is relevant to this study is briefly outlined below. These environmental requirements are not intended to be definitive or exhaustive, but serve to highlight key environmental legislation and responsibilities only.

3.1 NATIONAL LEGISLATION

This section deals with nationally promulgated or nationally applicable legislation associated with the proposed Bloemsmond 4.

3.1.1 The Constitution of the Republic of South Africa

The Constitution of the Republic of South Africa (Act 108 of 1996) states that everyone has a right to a non-threatening environment and that reasonable measures are applied to protect the environment. This includes preventing pollution and promoting conservation and environmentally sustainable development, while promoting justifiable social and economic development.

The Constitution and Bill of Rights provides that:

Everyone has the right:

- to an environment that is not harmful to their health or well-being; and
- to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures:
 - prevent pollution and ecological degradation
 - promote conservation; and
 - secure ecologically sustainable development and the use of natural resources while promoting justifiable economic and social development.

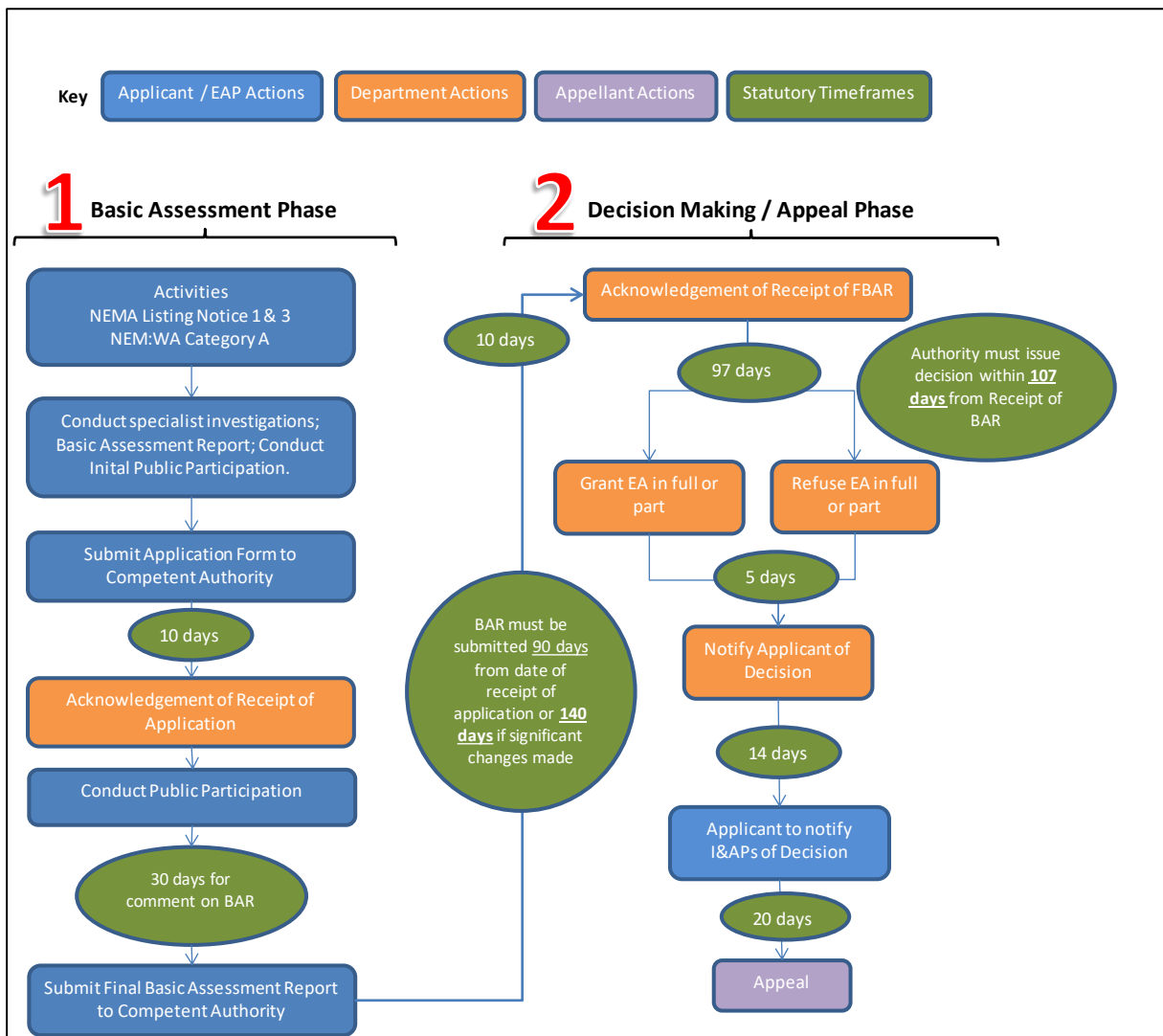
NEMA (discussed below) is the enabling legislation to ensure this primary right is achieved.

3.1.2 National Environmental Management Act (NEMA)

The current assessment is being undertaken in terms of the **National Environmental Management Act (NEMA, Act 107 of 1998)**¹².

This Act makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the competent authority (in this case, the national Department of Environmental Affairs, DEA) based on the findings of an Environmental Assessment.

The proposed development entails a number of listed activities, which would normally require a Scoping & Environmental Impact Reporting process, but due to the project falling within a legislated REDZ, only requires a Basic Assessment Process. Such a process must be conducted by an independent EAP. Cape EAPrac has been appointed to undertake this process. The figure below depicts a summary of the Basic Assessment process.



¹² The Minister of Water and Environmental Affairs promulgated new regulations in terms of Chapter 5 of the National Environmental Management Act (NEMA, Act 107 of 1998), viz, the Environmental Impact Assessment (EIA) Regulations 2014 (as amended in April 2017). These regulations came into effect on 08 December 2014 (amended on 07 April 2017) and replace the EIA regulations promulgated in 2006 and 2010.

Figure 15: Summary of Basic Assessment Process in terms of the 2014 Regulations(as amended).

The listed activities associated with the proposed development, as stipulation under 2014 Regulations **327, 325 and 324** are as follows:

Table 6: NEMA 2014 (As amended in April 2017) listed activities applicable to Bloemsmond 4.

| Activity No(s): | Basic Assessment Activity(ies) as set out in Listing Notice 1 (GN R983) | Description |
|-----------------|---|--|
| 11 | The development of facilities or infrastructure for the transmission and distribution of electricity— (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts; | Construction of the IPP portion of the on-site substation. The grid connection to the Upington MTS via the Bloemsmond collector sub-station will be assessed as part of a separate Basic Assessment Process. |
| 12 | The development of— (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs— (a) within a watercourse; | Construction of internal and perimeter roads as well as PV mounting structures across the ephemeral washes identified on Portion 5 and 14 of the Farm Bloemsmond 455. |
| 19 | The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse; | Construction of internal and perimeter roads as well as PV mounting structures across the ephemeral washes identified on the properties. |
| 24 | The development of a road— (ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres; | Construction of the main access road to the site. |
| 28 | Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; | A PV facility is considered as commercial use, being proposed on an area used for agricultural purposes. |
| 56 | The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre— (ii) where no reserve exists, where the existing road is wider than 8 metres; | The existing access road will be widened by more than 6m in certain sections and will be lengthened by more than 1km to access the PV site. |
| Activity No(s): | Basic Assessment Activity(ies) as set out in Listing Notice 3 (GN R985) | Description |
| 4 | The development of a road wider than 4 metres with a reserve less than 13 metres. g. Northern Cape iii. Outside urban areas: (ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; | The access road crosses a CBA in the South of the property. This section of access road will be wider than 4m. |
| 12 | The clearance of an area of 300 square metres or more of indigenous vegetation. g. Northern Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; | The access road crosses a CBA in the South of the property. Construction of this road will require the removal of more than 300 square metres of vegetation in this CBA. |
| 14 | The development of— (ii) infrastructure or structures with a physical footprint of 10 square metres or more. g. Northern Cape | The access road crosses a CBA in the South of the property. This section of access road will be larger than 10 square metres. |

| Activity No(s): | Basic Assessment Activity(ies) as set out in Listing Notice 1 (GN R983) | Description |
|-----------------|--|--|
| | ii. Outside urban areas: (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; | |
| Activity No(s): | Scoping and EIR Activity(ies) as set out in Listing Notice 2 (GN R984) | Description |
| 1 | The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more, | The proposed Bloemsmond 4 comprises a renewable energy generation facility, which will utilise PV technology and will have a net generation capacity of up to 100MW. |
| 15 | The clearance of an area of 20 hectares or more of indigenous vegetation | Bloemsmond 4 will have a total footprint that will exceed 20ha and as such will require the removal of more than 20 Hectares of indigenous vegetation. |

Table 7: Activities applied for and their applicability to the components in the project description.

| Activity No(s): | Basic Assessment Activity(ies) as set out in Listing Notice 1 (GN R983) | Applicable Aspects of Project Description |
|-----------------|--|--|
| 11 | The development of facilities or infrastructure for the transmission and distribution of electricity— (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts; | On-site switching-station / substation; Inverter-stations, transformers and internal electrical reticulation (underground cabling); Bloemsmond 4 will connect from the on-site substation to the Uppington MTS via the Bloemsmond collector substation (this Basic Assessment process only includes the IPP portion of the on-site substation, while the remainder of the grid connection is being assessed as part of a separate Basic Assessment process). |
| 12 | The development of— (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs— (a) within a watercourse; | Access and internal road network; Perimeter fencing and security infrastructure. |
| 19 | The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse; | Access and internal road network; Perimeter fencing and security infrastructure. |
| 24 | The development of a road— (ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres; | Access road |
| 28 | Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; | Solar photovoltaic (PV) technology, fixed-tilt-, single-axis tracking- or dual-axis tracking-mounting structures, with a net generating capacity of 100 MW as well as all associated infrastructure. |
| 56 | The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre— (ii) where no reserve exists, where the existing road is wider than 8 metres; | Access Road |
| Activity | Basic Assessment Activity(ies) as set out in Listing Notice 1 (GN R983) | Description |

| Activity No(s): | Basic Assessment Activity(ies) as set out in Listing Notice 1 (GN R983) | Applicable Aspects of Project Description |
|------------------------|---|--|
| No(s): | Notice 3 (GN R985) | |
| 4 | The development of a road wider than 4 metres with a reserve less than 13 metres. g. Northern Cape iii. Outside urban areas: (ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; | Access and internal road network; |
| 12 | The clearance of an area of 300 square metres or more of indigenous vegetation. g. Northern Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; | Access Road |
| 14 | The development of— (ii) infrastructure or structures with a physical footprint of 10 square metres or more. g. Northern Cape ii. Outside urban areas: (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; | Access Road |
| Activity No(s): | Scoping and EIR Activity(ies) as set out in Listing Notice 2 (GN R984) | Description |
| 1 | The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more, | Solar photovoltaic (PV) technology, fixed-tilt-, single-axis tracking- or dual-axis tracking-mounting structures, with a net generating capacity of 100 MW |
| 15 | The clearance of an area of 20 hectares or more of indigenous vegetation | Solar photovoltaic (PV) technology, fixed-tilt-, single-axis tracking- or dual-axis tracking-mounting structures, with a net generating capacity of 100 MW as well as all associated infrastructure, which will include: <ul style="list-style-type: none"> - On-site switching-station / substation; - Auxiliary buildings (gate-house and security, control centre, office, warehouse, canteen & visitors centre, staff lockers etc.); - Inverter-stations, transformers and internal electrical reticulation (underground cabling); - Access and internal road network; - Laydown area; - Bloemsmond 3 will connect from the on-site substation to the Upington MTS via the Bloemsmond collector substation (this Basic Assessment process only includes the IPP portion of the on-site substation, while the remainder of the grid connection is being assessed as part of a separate Basic Assessment process). |

| Activity No(s): | Basic Assessment Activity(ies) as set out in Listing Notice 1 (GN R983) | Applicable Aspects of Project Description |
|-----------------|---|--|
| | | <ul style="list-style-type: none"> - Rainwater tanks; and - Perimeter fencing and security infrastructure. |

NOTE: Basic Assessment as well as S&EIR Activities are being triggered by the proposed development, but since the project is contained in a legislated REDZ, the EIA Process will follow a Basic Assessment process.

Before any of the above mentioned listed activities can be undertaken, authorisation must be obtained from the relevant authority, in this case the DEA. Should the Department approve the proposed activity, the Environmental Authorisation does not exclude the need for obtaining relevant approvals from other Authorities who have a legal mandate in respect of the activity.

3.1.3 National Environmental Management: Biodiversity (Act 10 of 2004)

The National Environmental Management: Biodiversity Act (Act 10 of 2004) (NEMBA) provides for listing threatened or protected ecosystems, in one of four categories: critically endangered (CR), endangered (EN), vulnerable (VU) or protected. The Draft National List of Threatened Ecosystems (Notice 1477 of 2009, Government Gazette No 32689, 6 November 2009) has been gazetted for public comment.

The list of threatened terrestrial ecosystems supersedes the information regarding terrestrial ecosystem status in the NSBA 2004. In terms of the EIA regulations, a Basic Assessment report is required for the transformation or removal of indigenous vegetation in a critically endangered or endangered ecosystem regardless of the extent of transformation that will occur. **However, the vegetation types on both alternative footprints are classified as Least Threatened.**

NEMBA also deals with endangered, threatened and otherwise controlled species. The Act provides for listing of species as threatened or protected, under one of the following categories:

- **Critically Endangered:** any indigenous species facing an extremely high risk of extinction in the wild in the immediate future.
- **Endangered:** any indigenous species facing a high risk of extinction in the wild in the near future, although it is not a critically endangered species.
- **Vulnerable:** any indigenous species facing an extremely high risk of extinction in the wild in the medium-term future; although it is not a critically endangered species or an endangered species.
- **Protected species:** any species which is of such high conservation value or national importance that it requires national protection. Species listed in this category include, among others, species listed in terms of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

Certain activities, known as Restricted Activities, are regulated by a set of permit regulations published under the Act. These activities may not proceed without environmental authorization.

The study area is located in the Kalahari Karroid Shrubland (Least threatened) and Bushmanland Arid Grassland (Least threatened) vegetation types. The study area is not located in a threatened ecosystem the Lower Gariep Alluvial Vegetation threatened ecosystem is located south of the study area.

Kalahari Karroid Shrubland vegetation type is endemic to the Northern Cape Province. The vegetation type is characteristic of forming belts alternating with belts of *Gordonia* Duneveld on plains northwest of Upington through Lutzputs and Noenieput to the Rietfontein/Mier area in the north. Other patches occur around Kakamas and north of Groblershoop. The unit is also found in the neighbouring Namibia.

The vegetation can be described as low karroid shrubland on flat, gravel plains. Karoo-related and northern floristic elements such as shrubs meet here, indicating a transition to the Kalahari region and sandy soils. Altitude varies mostly from 700 - 1100 m. The conservation target is set at 21% with very little statutorily conserved in the Augrabies Falls National Park. Although only a small area has been transformed many of the belts of this type were preferred routes for early roads, thus promoting the introduction of alien plants (about a quarter of the unit has scattered *Prosopis* species). Erosion is very low (94%) (Mucina & Rutherford, 2010).

The Bushmanland Arid Grassland vegetation type occurs only in the Northern Cape Province. It spans about one degree of latitude from around Aggeneys in the west to Prieska in the east. The southern border of the unit is formed by edges of the Bushmanland Basin while in the northwest this vegetation unit borders on desert vegetation (northwest of Aggeneys and Pofadder). The northern border (in the vicinity of Upington) and the eastern border (between Upington and Prieska) are formed with often intermingling units of Lower Gariep Broken Veld, Kalahari Karroid Shrubland and Gordonia Duneveld. Most of the western border is formed by the edge of the Namaqualand hills. Altitude varies mostly from 600–1 200 m. The conservation target is set at 21% with only small patches statutorily conserved in Augrabies Falls National Park and Goegab Nature Reserve. Very little of the area has been transformed. Erosion is very low (60%) and low (33%) (Mucina & Rutherford, 2010).

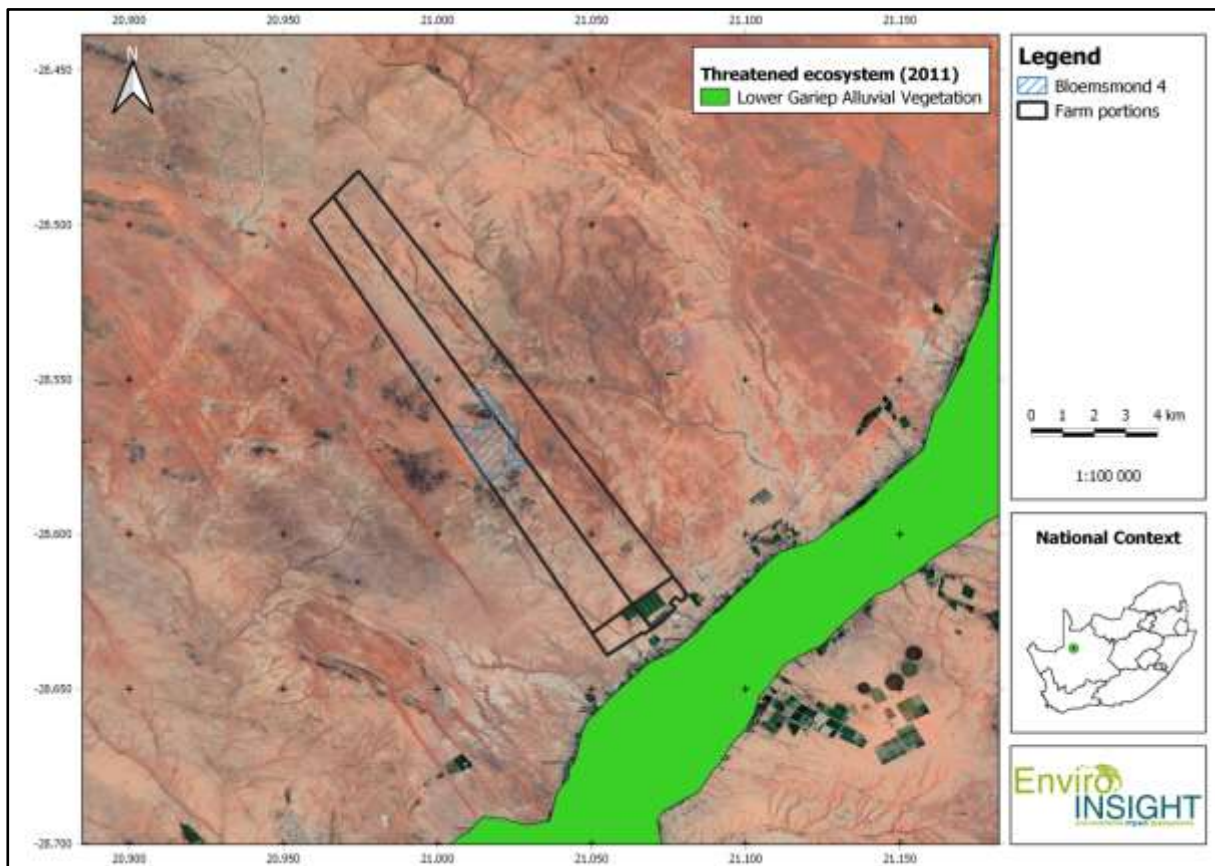


Figure 16: The study area for Bloemsmond 4 in relation to threatened ecosystems.

3.1.4 Conservation of Agricultural Resources Act – CARA (Act 43 of 1983):

The Conservation of Agricultural Resources Act (CARA) provides for the regulation of control over the utilisation of the natural agricultural resources in order to promote the conservation of soil, water and vegetation and provides for combating weeds and invader plant species. CARA defines different categories of alien plants:

- Category 1 - prohibited and must be controlled;

- Category 2 – must be grown within a demarcated area under permit; and
- Category 3 - ornamental plants that may no longer be planted, but existing plants may remain provided that all reasonable steps are taken to prevent the spreading thereof, except within the flood lines of water courses and wetlands.

The abundance of alien plant species on the Bloemsmond 4 site is very low, which can be ascribed mainly to the aridity of the site.

The Department of Agriculture, Land Reform and Rural Development is guided by Act 43 of 1983.

In order to comply with their mandate in terms of this legislation, the applicant is required to take note of the following:

Article 7.(3)b of Regulation 9238: CONSERVATION OF AGRICULTURE RESOURCES, 1983 (Act 43 of 1983)

Utilisation and protection of vleis, marshes, water sponges and water courses

- 7.(1) “no land user shall utilize the vegetation in a vlei, marsh or water sponge or within the flood area of a water course or within 10 meters horizontally outside such flood area in a manner that causes or may cause the deterioration of or damage to the natural agriculture resources.”
- (3)(b) “cultivate any land on his farm unit within the flood area of a water course or within 10 meters horizontally outside the flood area of a water course”.

Kindly refer to the Freshwater Ecological Impact Assessment in **Annexure E2** for a discussion of potential impacts on the freshwater resources on site.

3.1.5 The Subdivision of Agricultural Land, Act 70 Of 1970

The Subdivision of Agricultural Land Act 70 of 1970 (SALA”) came into operation on 2 January 1971. The Department of Agriculture, Forestry and Fisheries (DAFF) administers the Subdivision of Agricultural Land Act No. 70 of 1970. Subdivision of agricultural land, therefore, requires DAFF’s consent.

DAFF is considered a commenting authority on this environmental process, but will be a decision making authority on the SALA application which will take place after the project receives an EA.

3.1.6 National Water Act, No 36 of 1998

Section 21c & i of the National Water Act (NWA) requires the Applicant to apply for authorisation from the Department of Water and Sanitation for an activity in, or in proximity to any watercourse. Such an application would be required for any access road or PV infrastructure that crosses any watercourse.

Section 21(a) of the National Water Act is related to the abstraction of water from a water resource (including abstraction of groundwater); a Water Use Licence (WUL) would be required for such abstraction.

Water required for the construction and operation of Bloemsmond 4 is to be sourced either from the Kai !Garib Local Municipality. Should the applicant in the future, wish to utilise groundwater for the purposes of construction or operation of the facility, such use will require a licence in terms of Section 21(a) of the NWA.

The freshwater specialist has identified a number of drainage lines and alluvial washes which occur on plains as well as slopes, as well as pans occur on plains within the broader study area. The final preferred layout has avoided all drainage lines, pans and the high sensitivity alluvial washes. Certain aspects of the development (mainly the perimeter tracks) do however encroach on some of the low and medium sensitivity alluvial washes. Such encroachments will require authorisation in terms of the National Water Act. Proof of submission of the Water Use Licences is included in Appendix G7..

The Department of Water and Sanitation have been registered as a key stakeholder in this environmental process.

3.1.7 National Forests Act (No. 84 of 1998):

The National Forests Act (NFA) provides for the protection of forests as well as specific tree species, quoting directly from the Act: “*no person may cut, disturb, damage or destroy any protected tree or possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree or any forest product derived from a protected tree, except under a licence or exemption granted by the Minister to an applicant and subject to such period and conditions as may be stipulated*”.

The ecological specialist, Enviro Insight, identified the following species on site which are protected in terms of the National Forest Act.

Table 8: Species present on site that are protected in terms of the National Forest Act.

| Species | Common Name | SANBI National Red List ¹³ | Northern Cape Protected ¹⁴ | National Forest Act (1998) ¹⁵ | Habitat Description |
|---------------------------|-----------------|---------------------------------------|---------------------------------------|--|---|
| <i>Boscia albitrunca</i> | Shepherd's tree | Least Concern | Yes | Yes | Terrestrial – including seven provinces excluding Western and Eastern Cape |
| <i>Vachellia erioloba</i> | Camel thorn | Least Concern | Yes | Yes | Widespread in the arid northern provinces of South Africa, also Namibia, Botswana, Zimbabwe, southern Angola and south-western Zambia |

Notwithstanding, the significance associated with the removal of protected trees for the proposed development, the applicant will be required to submit an application in terms of the NFA for a licence to remove individuals of these two species.

The Department of Agriculture, Forestry and Fisheries (DAFF) (now the department of Environment, Forestry and Fisheries) have been registered as a key stakeholder in this environmental process and will be requested to provide comment in this regard.

3.1.8 National Heritage Resources Act, 25 of 1998

The protection and management of South Africa's heritage resources are controlled by the National Heritage Resources Act (Act No. 25 of 1999). South African National Heritage Resources Agency (SAHRA) is the enforcing authority in the Northern Cape, and is registered as a Stakeholder for this environmental process.

¹³ <http://redlist.sanbi.org/>

¹⁴ Northern Cape Nature Conservation Act (Act No 9 of 2009)

¹⁵ Notice of the list of protected tree species under the National Forests Act 84 of 1998 published in GN 182 in GG 41100 of 8 September 2017

In terms of Section 38 of the National Heritage Resources Act, SAHRA will comment on the detailed Heritage Impact Assessment (HIA) where certain categories of development are proposed. Section 38(8) also makes provision for the assessment of heritage impacts as part of an EIA process.

The National Heritage Resources Act requires relevant authorities to be notified regarding this proposed development, as the following activities are relevant:

- the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;
- any development or other activity which will change the character of a site exceeding 5 000 m² in extent; and
- the re-zoning of a site exceeding 10 000m² in extent.

Furthermore, in terms of Section 34(1), no person may alter or demolish any structure or part of a structure, which is older than 60 years without a permit issued by the SAHRA, or the responsible resources authority.

- In terms of Section 36 (3), no person may destroy, damage, alter, exhume or remove from its original position, or otherwise disturb, any grave or burial ground older than 60 years, which is situated outside a formal cemetery administered by a local authority, without a permit issued by the SAHRA, or a provincial heritage authority.
- In terms of Section 35 (4), no person may destroy, damage, excavate, alter or remove from its original position, or collect, any archaeological material or object, without a permit issued by the SAHRA, or the responsible resources authority.

Mr Jaco van der Walt of HCAC heritage consultants, has undertaken a heritage impact assessment for the proposed Bloemsmond 4 Solar Facility. This heritage study has included a Paleontological Desktop Assessment undertaken by Dr John Almond.

Please refer to the Heritage Impact Report, Paleontological Desktop Assessment attached in Annexure E4 and E5 respectively.

The application in terms of Section 38 of the NHA has been lodged with SAHRA via their SAHRIS system. Please Refer to Appendix G9 for proof of submission of this application.

3.1.9 National Energy Act (No. 34 of 2008)

The purpose of the National Energy Act (No. 34 of 2008) is to ensure that diverse energy resources are available, in sustainable quantities and at affordable prices, to the South African economy in support of economic growth and poverty alleviation; while taking environmental management requirements into account. In addition, the Act also provides for energy planning, and increased generation and consumption of Renewable Energies.

The objectives of the Act, are to amongst other things, to:

- Ensure uninterrupted supply of energy to the Republic.
- Promote diversity of supply of energy and its sources.
- Facilitate energy access for improvement of the quality of life of the people of the Republic.
- Contribute to the sustainable development of South Africa's economy.

The National Energy Act therefore recognises the significant role which electricity plays growing the economy while improving citizens' quality of life. The Act provides the legal framework which supports the development of Renewable Energy facilities for the greater environmental and social good, and provides the backdrop against which South Africa's strategic planning regarding future electricity provision and supply takes place.

3.2 PROVINCIAL LEGISLATION

This section deals with provincially promulgated or provincially applicable legislation associated with the proposed Bloemsmond 4.

3.2.1 Northern Cape Nature Conservation Act, No. 9 of 2009

The Northern Cape Nature Conservation Act provides inter alia for the sustainable utilisation of wild animals, aquatic biota and plants as well as permitting and trade regulations regarding wild fauna and flora within the province. In terms of this act the following section may be relevant with regards to any security fencing the solar development may require.

Manipulation of boundary fences: 19. No Person may –

(a) erect, alter, remove or partly remove or cause to be erected, altered, removed or partly removed, any fence, whether on a common boundary or on such person's own property, in such a manner that any wild animal which as a result thereof gains access or may gain access to the property or a camp on the property, cannot escape or is likely not to be able to escape therefrom.

It is recommended that the perimeter fencing around the solar development site will be constructed in a manner which allows for the passage of small and medium sized mammals: The biodiversity specialist will make recommendations with regard to the specific fencing configuration during the EIA phase of this project.

The ecology specialist identified the following species protected in terms of this Act.

Table 9: Species identified on site that are protected in terms of the Northern Cape Nature Conservation Act.

| Species | Common Name | SANBI National Red List ¹⁶ | Habitat Description |
|-------------------------------|-----------------------------|---------------------------------------|---|
| <i>Aloe claviflora</i> | Aanteelaalwyn | Least Concern | Well drained areas on rocky slopes or flat stony areas at the margins of Kalahari Thornveld. Usually, but not always, on calcrete |
| <i>Anacampseros albissima</i> | | Least Concern | Rock outcrops and quartz flats. Southern Angola through Namibia to the Richtersveld, and eastwards through Bushmanland to Griqualand West. |
| <i>Boscia albitrunca</i> | Shepherd's tree | Least Concern | Terrestrial – including seven provinces excluding Western and Eastern Cape |
| <i>Boscia foetida</i> | | Least Concern | Terrestrial – Northern Cape |
| <i>Hoodia gordonii</i> | Bitterghaap, Bobbejaanghaap | Least Concern | Occurs in a wide variety of arid habitats from coastal to mountainous, also on gentle to steep shale ridges, found from dry, rocky places to sandy spots in riverbeds – Desert, Nama Karoo, Savanna, Succulent Karoo. |
| <i>Vachellia erioloba</i> | Camel thorn | Least Concern | Widespread in the arid northern provinces of South Africa, also Namibia, Botswana, Zimbabwe, |

¹⁶ <http://redlist.sanbi.org/>

| Species | Common Name | SANBI National Red List ¹⁶ | Habitat Description |
|---------|-------------|---------------------------------------|--|
| | | | southern Angola and south-western Zambia |

Please also refer to the Ecological Impact Report attached in Annexure E1 for further information on protected species present on site.

3.2.2 Nature and Environmental Conservation Ordinance, No 19 of 1974

This legislation was developed to protect both animal and plant species within the various provinces of the country which warrant protection. These may be species which are under threat or which are already considered to be endangered. The provincial environmental authorities are responsible for implementing the provisions of this legislation, which includes the issuing of permits etc. In the Northern Cape, the Department of Environment and Nature Conservation fulfils this mandate as per the Northern Cape Nature Conservation Act as described above.

3.2.3 Astronomy Geographic Advantage Act, 2007 (Act No 21 Of 2007)

The purpose of the Act is to preserve the geographic advantage areas that attract investment in astronomy. The entire Northern Cape Province, excluding the Tsantsabane Municipality, has been declared an astronomy advantage area. The Northern Cape optical and radio telescope sites were declared core astronomy advantage areas. The Act allowed for the declaration of the Southern Africa Large Telescope (SALT), Meerkat and Square Kilometre Array (SKA) as astronomy and related scientific endeavours that has to be protected.

Chapter 2 of the act allows for the declaration of astronomy advantage areas whilst Chapter 3 pertains to the management and control of astronomy advantage areas. Management and control of astronomy advantage areas include, amongst others, the following:

- Restrictions on use of radio frequency spectrum in astronomy advantage areas;
- Declared activities in core or central astronomy advantage area;
- Identified activities in coordinated astronomy advantage area; and
- Authorisation to undertake identified activities.

The South African SKA Project Office have been registered as a key stakeholder on this environmental process and have been requested to provide input in terms of the Astronomy Geographic Advantage Act and potential impact to SKA. The SKA-SA project office provided comment on the two previous projects (AEP Bloemsmond 1 and 2), and confirmed that the projects pose a low risk to SKA, due to the distance from the nearest SKA station.

Furthermore, SKA have confirmed that this Project, Bloemsmond 4, will not have a detrimental impact on the SKA. Please refer to Appendix F5 for copies of this confirmation from SKA.

3.2.4 Northern Cape Provincial Spatial Development Framework (PSDF) 2012

The Northern Cape Provincial Spatial Development Framework (PSDF) 2012 states that the overarching goal for the Province is to enable sustainability through sustainable development. The Province considers social and economic development as imperative in order to address the most significant challenge facing the Northern Cape, which is poverty.

The PSDF considers the release of greenhouse gas (GHG) emissions created by human activity as the key cause of global warming, which in turn could result in major negative effects and disasters in the short- and medium-term. This effect would increasingly undermine human development gains. Innovative strategies would have to be implemented to reduce the impact of global deterioration.

The PSDF identifies key sectoral strategies and plans which are considered to be the key components of the PSDF. Sectoral Strategy 19 refers to a provincial renewable energy strategy. Within the PSDF

a policy has been included which states that renewable energy sources (including the utilisation of solar energy) are to comprise 25% of the Province's energy generation capacity by 2020.

The overall energy objective for the Province also includes promoting the development of renewable energy supply schemes which are considered to be strategically important for increasing the diversity of domestic energy supply and avoiding energy imports, while also minimising the detrimental environmental impacts. The implementation of sustainable renewable energy is also to be promoted within the Province through appropriate financial and fiscal instruments.

Considering the need for the development of renewable energy facilities in order to achieve the objective of sustainability the development of the proposed SEF within the Northern Cape and within the study area is considered to be aligned with the Northern Cape PSDF.

3.2.5 Northern Cape Province Provincial Growth and Development Strategy

The Northern Cape Provincial Growth and Development Strategy (NCPGDS) identifies poverty reduction as the most significant challenge facing the government and its partners. All other societal challenges that the province faces emanate predominantly from the effects of poverty. The NCPGDS notes that the only effective way to reduce poverty is through long-term sustainable economic growth and development. The sectors where economic growth and development can be promoted include:

- Agriculture and Agro-processing;
- Fishing and Mariculture;
- Mining and mineral processing;
- Transport;
- Manufacturing;
- Tourism.

However, the NCPGDS also notes that economic development in these sectors also requires:

- Creating opportunities for lifelong learning;
- Improving the skills of the labour force to increase productivity;
- Increasing accessibility to knowledge and information.

The achievement of these primary development objectives depends on the achievement of a number of related objectives that, at a macro-level, describe necessary conditions for growth and development. These are:

- Developing requisite levels of human and social capital;
- Improving the efficiency and effectiveness of governance and other development institutions;
- Enhancing infrastructure for economic growth and social development.

Of specific relevance to this EIA and more specifically, the SIA is that the NCPGDS make reference to the need to ensure the availability of inexpensive energy. The section notes that in order to promote economic growth in the Northern Cape the availability of electricity to key industrial users at critical localities at rates that enhance the competitiveness of their industries must be ensured. At the same time, the development of new sources of energy through the promotion of the adoption of energy applications that display a synergy with the province's natural resource endowments must be encouraged. In this regard the NCPGDS notes "the development of energy sources such as solar energy, the natural gas fields, bio-fuels, etc., could be some of the means by which new economic opportunity and activity is generated in the Northern Cape". The NCPGDS also highlights the importance of close co-operation between the public and private sectors in order for the economic development potential of the Northern Cape to be realised.

The NCPGDS also highlights the importance of enterprise development, and notes that the current levels of private sector development and investment in the Northern Cape are low. In addition, the province also lags in the key policy priority areas of SMME Development and Black Economic

Empowerment. The proposed solar energy facility therefore has the potential to create opportunities to promote private sector investment and the development of SMMEs in the Northern Cape Province.

In this regard care will need to be taken to ensure that the proposed STPs and other renewable energy facilities do not negatively impact on the regions natural environment. In this regard the NCPGDS notes that the sustainable utilisation of the natural resource base on which agriculture depends is critical in the Northern Cape with its fragile eco-systems and vulnerability to climatic variation. The document also indicates that due to the provinces exceptional natural and cultural attributes, it has the potential to become the preferred adventure and ecotourism destination in South Africa. Care therefore needs to be taken to ensure that the development of large renewable energy projects, such as the proposed solar energy facility, do not affect the tourism potential of the province.

3.2.6 Northern Cape Climate Change Response Strategy

The key aspects of the PCCRS Report are summarised in the MEC's (NCPG: Environment and Nature Conservation) 2011 budget speech: "The Provincial Climate Change Response Strategy will be underpinned by specific critical sector climate change adaptation and mitigation strategies that include the water, agriculture and human health sectors as the 3 key adaptation sectors, the industry and transport alongside the energy sector as the 3 key mitigation sectors with the disaster management, natural resources and Hhman society, livelihoods and services sectors as 3 remaining key sectors to ensure proactive long term responses to the frequency and intensity of extreme weather events such as flooding and wild fire, with heightened requirements for effective disaster management".

Key points from MEC's address include the NCPG's commitment to develop and implement policy in accord with the National Green Paper for the National Climate Change Response Strategy (2010), and an acknowledgement of the NCP's extreme vulnerability to climate-change driven desertification. The development and promotion of a provincial green economy, including green jobs, and environmental learnership is indented as an important provincial intervention in addressing climate change. The renewable energy sector, including solar and wind energy (but also biofuels and energy from waste), is explicitly indicated as an important element of the Provincial Climate Change Response Strategy. The MEC also indicated that the NCP was involved in the processing a number of wind and solar energy facility EIA applications.

3.3 REGIONAL AND MUNICIPAL LEGISLATION

This section deals with regionally and municipally promulgated or regionally or municipally applicable legislation associated with the proposed Bloemsmond 4¹⁷.

3.3.1 ZF Mgcawu District Municipality Integrated Development Plan

The vision set out in the ZFMDM is "Quality support to deliver quality services". The mission is a "Centre of excellence in providing quality basic services through support to local municipalities".

In terms of the National Spatial Development Perspective, The ZF Mgcawu District area has been classified as a "medium" importance area which means that no significant investment is concentrated in the region. In terms of the National Spatial Development Perspective, The ZF Mgcawu District area has been classified as a "medium" importance area which means that no significant investment is concentrated in the region.

¹⁷ This section includes legislation applicable to both the District (Category C) and Local (Category B) municipalities.

The IDP lists a number of strategic objectives and development objectives. The relevant objectives include:

| Strategic objective |
|---|
| To Facilitate the Development of Sustainable regional land use, economic, spatial and environmental planning frameworks that will support and guide the development of a diversified, resilient and sustainable district economy. The associated development objective is to: <ul style="list-style-type: none"> - Establish a vehicle to ensure all businesses are co-operating (i.e. District LED Forum); - Create investment opportunities in sectoral development (i.e. investment activities; Entrepreneurial business support programme); - Enable an environment for business establishment and support initiatives (i.e. Increase the number of businesses; entrepreneurial support) |

| Strategic objective |
|--|
| To market, develop and co-ordinate tourism in the ZFMDM. The associated development objective is to: |

- Promote the Green Kalahari tourism brand in the ZF Mgcawu district

The IDP identifies a number of key challenges. The following are relevant to the proposed development:

- High rate of unemployment;
- Inadequate human capital;
- Youth development;
- Access to health care facilities.

In terms of the Kai Garib Municipality, the priority issues include:

- Lack of Basic Services;
- Lack of proper housing / existing informal settlements/ Lack of Land Ownership;
- Poverty & unemployment, lack of youth development and social issues contributing thereto (Local Economic Development) / Lack of farming land/ commonage;
- Lack of sport and recreational facilities and services;
- Lack of sufficient and proper health services (HIV/AIDS).

The IDP also notes that the ZF Mgcawu District Municipality acknowledges that climate change poses a threat to the environment, its residents, and future development. Actions are required to reduce carbon emissions (mitigation), and prepare for the changes that are projected to take place (adaptation) in the District. ZF Mgcawu District Municipality has therefore prioritised the development of a Climate Change Vulnerability Assessment and Climate Change Response Plan.

3.3.2 Kai! Garib Local Municipality Integrated Development Plan

The vision for the Kai! Garib LM is “Creating an economically viable and fully developed municipality, which enhances the standard of living of all the inhabitants / community of Kai! Garib through good governance, excellent service delivery and sustainable development.” The mission is the “Provision of transparent, accountable and sustainable service delivery”.

The IDP notes that that the activities of the KGLM are guided by a number of values, of which the following are relevant to the proposed development:

- Transparency in planning and management;
- Proper understanding of the needs of communities;
- The implementation of a development orientated approach to Local Government;

- Building capacity among the staff and Community wherever possible in order to enable them to play an effective role in Local Government.

The IDP is aligned with the National Government identified Key Performance Areas (KPA's) which are:

- KPA 1: Service Delivery and Infrastructure Development;
- KPA 2: Local Economic Development;
- KPA 3: Municipal Financial Viability and Management;
- KPA 4: Institutional Development and Transformation;
- KPA 5: Public Participation and Good Governance.

KPA 2, Local Economic Development, is the most relevance KPA for the proposed development.

3.4 GUIDELINES, POLICIES AND AUTHORITATIVE REPORTS

This section includes relevant Guidelines, Policies and Authoritative reports applicable to the proposed Bloemsmond 4.

3.4.1 National Protected Area Expansion Strategy (NPAES) for S.A. 2008 (2010)

Considering that South Africa's protected area network currently falls far short of sustaining biodiversity and ecological processes, the NPEAS aims to achieve cost-effective protected area expansion for ecological sustainability and increased resilience to Climate Change. Protected areas, recognised by the National Environmental Management: Protected Areas Act (Act 57 of 2003), are considered formal protected areas in the NPAES. The NPAES sets targets for expansion of these protected areas, provides maps of the most important protected area expansion, and makes recommendations on mechanisms for protected area expansion.

The NPAES identifies 42 focus areas for land-based protected area expansion in South Africa. These are large intact and un-fragmented areas suitable for the creation or expansion of large protected areas. The closest focus area is the Eastern Kalahari Bushveld Focus Area ; the proposed Bloemsmond 4 will not affect this or any other NPAES focus area as it is situated considerable distance from the Eastern Kalahari Bushveld Focus Area.

3.4.2 Critical Biodiversity Areas

A Critical Biodiversity Areas (CBA) Map is a spatial plan for ecological sustainability. It identifies a set of biodiversity priority areas, called Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs), which, together with protected areas, are important for the persistence of a viable representative sample of all ecosystem types and species as well as the long-term ecological functioning of the landscape as a whole.

CBA Maps can be given formal legal status through the National Environmental Management: Biodiversity Act (Act 10 of 2004),

The Northern Cape Critical Biodiversity Area (CBA) Map updates, revises and replaces all older systematic biodiversity plans and associated products for the province.

According to the CBA Map, Bloemsmond 4 is located in the category "Other Natural Areas". From an ecological perspective, development is preferred within "transformed" and "Other Natural Areas" rather than in "CBA's"

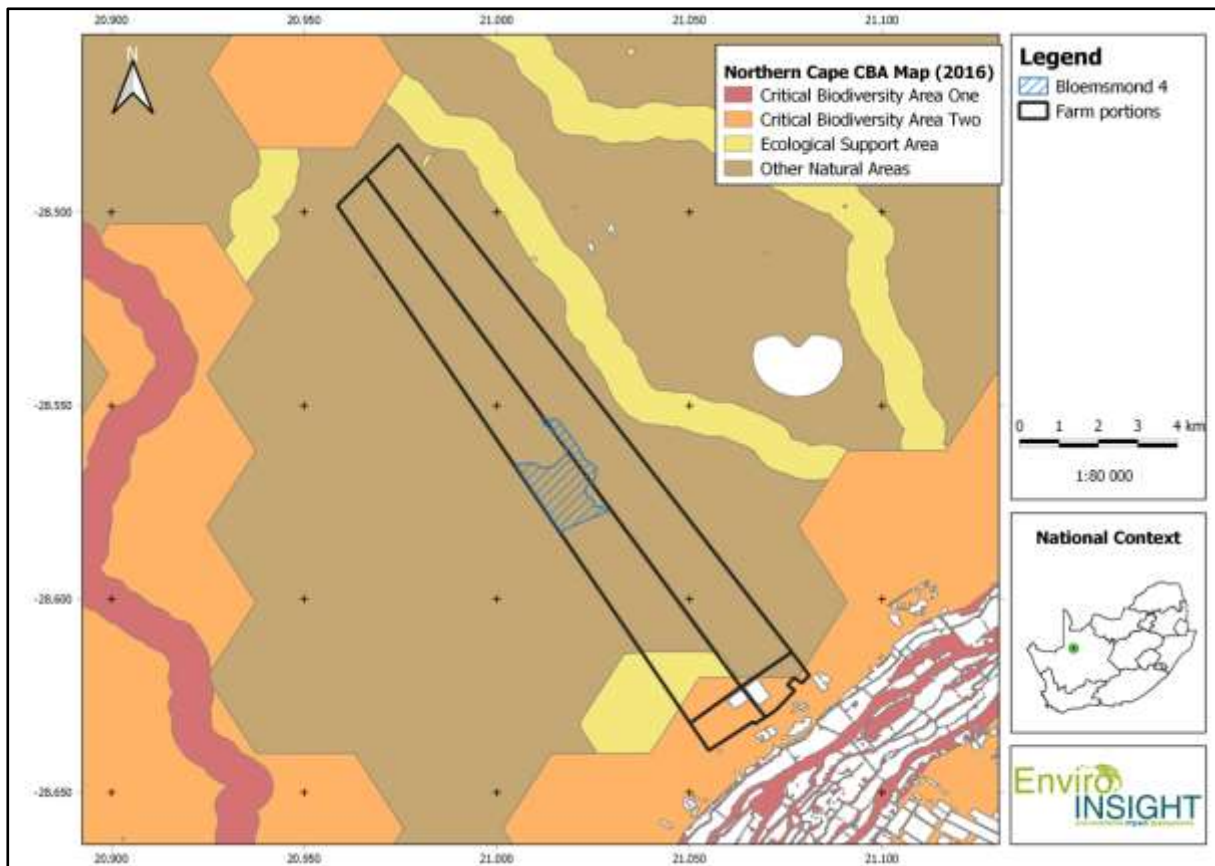


Figure 17: The study area for Bloemsmond 4 in relation to the Northern Cape Critical Biodiversity Areas (2016).

3.4.3 White Paper on the Renewable Energy Policy of the Republic of South Africa (2003)

The White Paper on Renewable Energy Policy of 2003 supplements Government's predominant policy on energy as set out in the White Paper on the Energy Policy of the Republic of South Africa (DME, 1998). The policy recognises the potential of RE, and aims to create the necessary conditions for the development and commercial implementation of RE technologies. The position of the White Paper on RE Policy is based on the integrated resource planning criterion of:

“Ensuring that an equitable level of national resources is invested in renewable technologies, given their potential and compared to investments in other energy supply options.”

The White Paper on Renewable Energy Policy sets out Government's vision, policy principles, strategic goals and objectives for promoting and implementing Renewable Energy in South Africa. The country relies heavily on coal to meet its energy needs due to its abundant, and fairly accessible and affordable coal resources. However, massive RE resources that can be sustainable alternatives to fossil fuels, have so far remained largely untapped. The White Paper on Renewable Energy Policy fosters the uptake of Renewable Energy in the economy and has a number of objectives that include: ensuring equitable resources are invested in renewable technologies; directing public resources for implementation of Renewable Energy technologies; introducing suitable fiscal incentives for Renewable Energy and; creating an investment climate for the development of the RE sector.

The White Paper on Renewable Energy Policy set a target of 10 000GWh to be generated from RE by 2013 to be produced mainly from biomass, wind, solar and small-scale hydro. The target was subsequently reviewed in 2009 during the RE summit of 2009. The objectives of the White Paper on Renewable Energy Policy are considered in six focal areas, namely; financial instruments, legal

instruments, technology development, awareness raising, capacity building and education, and market based and regulatory instruments. The policy supports the investment in Renewable Energy facilities as they contribute towards ensuring energy security through the diversification of energy supply, reducing GHG emissions and the promotion of Renewable Energy sources.

3.4.4 White Paper on the Energy Policy of the Republic of South Africa (1998)

The White Paper on Energy Policy places emphasis on the expansion of energy supply options to enhance South Africa's energy security. This can be achieved through increased use of renewable energy and encouraging new entries into the generation market. South Africa has an attractive range of cost effective renewable resources, taking into consideration social and environmental costs. Government policy on renewable energy is thus concerned with meeting the following challenges:

- Ensuring that economically feasible technologies and applications are implemented.
- Ensuring that an equitable level of national resources is invested in renewable technologies, given their potential and compared to investments in other energy supply options.
- Addressing constraints on the development of the renewable industry.

The policy states that the advantages of Renewable Energy include; minimal environmental impacts during operation in comparison with traditional supply technologies, generally lower running costs, and high labour intensities. Disadvantages include; higher capital costs in some cases; lower energy densities; and lower levels of availability, depending on specific conditions, especially with sun and wind based systems. Nonetheless, renewable resources generally operate from an unlimited resource base and, as such, can increasingly contribute towards a long-term sustainable energy future. The White Paper on Energy Policy therefore supports the advancement of Renewable Energy sources and ensuring energy security through the diversification of supply.

3.4.5 Integrated Energy Plan (IEP), 2016

The development of a National Integrated Energy Plan (IEP) was envisaged in the White Paper on the Energy Policy of the Republic of South Africa of 1998 and, in terms of the National Energy Act, 2008 (Act No. 34 of 2008), the Minister of Energy is mandated to develop and, on an annual basis, review and publish the IEP in the Government Gazette. The purpose of the IEP is to provide a roadmap of the future energy landscape for South Africa which guides future energy infrastructure investments and policy development.

The IEP notes that South Africa needs to grow its energy supply to support economic **expansion and** in so doing, alleviate supply bottlenecks and supply-demand deficits. In addition, it is essential that all citizens are provided with clean and modern forms of energy at an affordable price. As part of the Integrated Energy Planning process, eight key objectives were identified, namely:

- Objective 1: Ensure security of supply;
- Objective 2: Minimise the cost of energy;
- Objective 3: Promote the creation of jobs and localisation;
- Objective 4: Minimise negative environmental impacts from the energy sector;
- Objective 5: Promote the conservation of water;
- Objective 6: Diversify supply sources and primary sources of energy;
- Objective 7: Promote energy efficiency in the economy; and
- Objective 8: Increase access to modern energy.

The IEP provides an assessment of current energy consumption trends within different sectors of the economy (i.e. agriculture, commerce, industry, residential and transport) and uses this information to identify future energy requirements, based on different scenarios. The scenarios are informed by different assumptions on economic development and the structure of the economy and also take into account the impact of key policies such as environmental policies, energy efficiency policies, transport policies and industrial policies, amongst others.

Based on this information the IEP then determines the optimal mix of energy sources and technologies to meet those energy needs in the most cost-effective manner for each of the scenarios. The associated environmental impacts, socio-economic benefits and macroeconomic impacts are also analysed. The IEP is therefore focused on determining the long-term energy pathway for South Africa, taking into account a multitude of factors which are embedded in the eight objectives.

As part of the analysis four key scenarios were developed, namely the Base Case, Environmental Awareness, Resource Constrained and Green Shoots scenarios:

- The Base Case Scenario assumes that existing policies are implemented and will continue to shape the energy sector landscape going forward. It assumes moderate economic growth in the medium to long term;
- The Environmental Awareness Scenario is characterised by more stringent emission limits and a more environmentally aware society, where a higher cost is placed on externalities caused by the supply of energy;
- The Resource Constrained Scenario in which global energy commodity prices (i.e. coal, crude oil and natural gas) are high due to limited supply;
- The Green Shoots Scenario describes an economy in which the targets for high economic growth and structural changes to the economy, as set out in the National Development Plan (NDP), are met.

The IEP notes that South Africa should continue to pursue a diversified energy mix which reduces reliance on a single or a few primary energy sources. In terms of renewable energy the document refers to wind and solar energy. The document does however appear to support solar over wind noting that solar PV and CSP with storage present excellent opportunities to diversify the electricity mix, to produce distributed generation and to provide off-grid electricity. Solar technologies also present the greatest potential for job creation and localisation. Incentive programmes and special focused programmes to promote further development in the technology, as well as solar roll-out programmes should be pursued.

3.4.6 Integrated Resource Plan for Electricity (2010-2030)

The Integrated Resource Plan (IRP) for Electricity 2010 – 2030 is a subset of the IEP and constitutes South Africa's national electricity plan. The primary objective of the IRP is to determine the long term electricity demand and detail how this demand should be met in terms of generating capacity, type, timing and cost. The IRP also serves as input to other planning functions, including amongst others, economic development and funding, and environmental and social policy formulation.

The current iteration of the IRP, led to the Revised Balanced Scenario (RBS) that was published in October 2010. Following a round of public participation which was conducted in November / December 2010, several changes were made to the IRP model assumptions. The document outlines the proposed generation new-build fleet for South Africa for the period 2010 to 2030. This scenario was derived based on a cost-optimal solution for new-build options (considering the direct costs of new build power plants), which was then "balanced" in accordance with qualitative measures such as local job creation.

The Policy-Adjusted IRP reflects recent developments with respect to prices for renewables. In addition to all existing and committed power plants, the plan includes 9.6GW of nuclear; 6.25GW of coal; 17.8GW of renewables; and approximately 8.9GW of other generation sources such as hydro, and gas.

3.4.7 National Development Plan 2030 (2012)

The National Development Plan (NDP) 2030 is a plan prepared by the National Planning Commission in consultation with the South African public which is aimed at eliminating poverty and reducing inequality by 2030. The NDP aims to achieve this by drawing on the energies of its people, growing

and inclusive economy, building capabilities, enhancing the capacity of the state and promoting leaderships and partnerships throughout society. While the achievement of the objectives of the NDP requires progress on a broad front, three priorities stand out, namely:

- Raising employment through faster economic growth.
- Improving the quality of education, skills development and innovation.
- Building the capability of the state to play a developmental, transformative role.

In terms of the Energy Sectors role in empowering South Africa, the NDP envisages that, by 2030, South Africa will have an energy sector that promotes:

- Economic growth and development through adequate investment in energy infrastructure. The sector should provide reliable and efficient energy service at competitive rates, while supporting economic growth through job creation.
- Social equity through expanded access to energy at affordable tariffs and through targeted, sustainable subsidies for needy households.
- Environmental sustainability through efforts to reduce pollution and mitigate the effects of climate change.

The NDP aims to provide a supportive environment for growth and development, while promoting a more labour-absorbing economy. The proposed project will assist in reducing carbon emissions targets and creating jobs in the local area as well as assist in creating a competitive infrastructure based on terms of energy contribution to the national grid.

3.4.8 The New Growth Path Framework

The aim of the New Economic Growth Path Framework is to enhance growth, employment creation and equity. Central to the New Growth Path is a massive investment in infrastructure as a critical driver of jobs across the economy. In this regard the framework identifies investments in five key areas namely: energy, transport, communication, water and housing.

The New Growth Path also identifies five other priority areas as part of the programme, through a series of partnerships between the State and the private sector. The Green Economy as one of the five priority areas to create jobs, including expansions in construction and the production of technologies for solar, wind and biofuels. In this regard clean manufacturing and environmental services are projected to create 300 000 jobs over the next decade.

3.4.9 National Infrastructure Plan

The South African Government adopted a National Infrastructure Plan in 2012. The aim of the plan is to transform the economic landscape while simultaneously creating significant numbers of new jobs and strengthen the delivery of basic services. The plan also supports the integration of African economies. In terms of the plan Government will invest R827 billion over the next three years to build new and upgrade existing infrastructure. The aim of the investments is to improve access by South Africans to healthcare facilities, schools, water, sanitation, housing and electrification. The plan also notes that investment in the construction of ports, roads, railway systems, electricity plants, hospitals, schools and dams will contribute to improved economic growth.

As part of the National Infrastructure Plan, Cabinet established the Presidential Infrastructure Coordinating Committee (PICC). The Committee identified and developed 18 strategic integrated projects (SIPs). The SIPs cover social and economic infrastructure across all nine provinces (with an emphasis on lagging regions) and consist of:

- Five geographically-focussed SIPs;
- Three spatial SIPs;
- Three energy SIPs;
- Three social infrastructure SIPs;

- Two knowledge SIPs;
- One regional integration SIP;
- One water and sanitation SIP.

The three energy SIPs that are related to Bloemsmond 4 are SIP 8, 9 and 10.

Table 10: Strategic Infrastructure applicable to Bloemsmond 4

| |
|---|
| SIP 8: Green energy in support of the South African economy |
| Support sustainable green energy initiatives on a national scale through a diverse range of clean energy options as envisaged in the Integrated Resource Plan (IRP 2010); Support bio-fuel production facilities. |
| SIP 9: Electricity generation to support socio-economic development |
| Accelerate the construction of new electricity generation capacity in accordance with the IRP 2010 to meet the needs of the economy and address historical imbalances; Monitor implementation of major projects such as new power stations: Medupi, Kusile and Ingula. |
| SIP 10: Electricity transmission and distribution for all |
| Expand the transmission and distribution network to address historical imbalances, provide access to electricity for all and support economic development. Align the 10-year transmission plan, the services backlog, the national broadband roll-out and the freight rail line development to leverage off regulatory approvals, supply chain and project development capacity. |

3.4.10 Strategic Environmental Assessment (SEA) for Wind and Solar PV energy in South Africa

The Strategic Environmental Assessment (SEA) for wind and solar PV energy in South Africa (CSIR, 2013) identified eight (8) Renewable Development Zones (REDZs). The REDZs identified areas where large scale renewable energy facilities can be developed in a manner that limits significant negative impacts on the environment while yielding the highest possible socio-economic benefits to the country. The Bloemsmond 4 site is located within the Upington REDZ, which was formally gazetted in 2018. The area has therefore been identified as suitable for the establishment of renewable energy facilities, specifically large scale solar farms.

3.4.11 Conservation of Migratory Species of Wild Animals

Conservation of Migratory Species of Wild Animals (also known as CMS or the Bonn Convention) is an intergovernmental treaty and is the most appropriate instrument to deal with the conservation of terrestrial, aquatic and avian migratory species. The convention includes policy and guidelines with regards to the impact associated with man-made infrastructure. CMS requires that parties (South Africa is a signatory) take measures to avoid migratory species from becoming endangered (Art II, par. 1 and 2) and to make every effort to prevent the adverse effects of activities and obstacles that seriously impede or prevent the migration of migratory species i.e. power lines (Art 111, par. 4b and 4c).

An Avifaunal Specialist has been appointed to consider the impact of the proposed Bloemsmond 4 as well as the powerline connecting the facility to the Eskom Upington MTS (the powerline to the MTS is being assessed as part of a separate Basic Assessment process). Birdlife Africa South Africa has also been given an opportunity to comment in this regard.

3.4.12 The Agreement on the Convention of African-Eurasian Migratory Water Birds

The Agreement on the Conservation of African-Eurasian Migratory Water birds (AEWA) is an intergovernmental treaty dedicated to the conservation of migratory waterbirds and their habitat across Africa, Europe, the Middle East Central Asia, Greenland and the Canadian Archipelago. The AEWA covers 255 species of birds ecologically dependent on wetlands for at least part of their annual cycle and is a legally binding agreement by all contracting parties (South Africa included) to guarantee the conservation of migratory waterbirds within their national boundaries through species and habitat protection and the management of human activities. As mentioned above, an Avifaunal Specialist has

been appointed to consider the impact of the proposed Bloemsmond 4 as well as the powerline connecting the facility to the Eskom Upington MTS (the powerline is being assessed as part of a separate Basic Assessment Process) (**Annexure E1**). Birdlife Africa South Africa has also been given an opportunity to comment in this regard.

3.4.13 Guidelines to minimise the impacts on birds of Solar Facilities and Associated Infrastructure in South Africa

The “Guidelines to minimise the impact on birds of Solar Facilities and Associated Infrastructure in South Africa” (Smit, 2012) is perhaps the most important (although not legally binding) document from an avifaunal impact perspective currently applicable to solar development in South Africa. The guidelines are published by BirdLife South Africa (BLSA) and detail the recommended procedure for conducting an avifaunal specialist study as well as list all of the potential impacts of interactions between birds and solar facilities and associated infrastructure. We are aware of changes to the BLSA best-practise guidelines recently published at the Birds and Renewable Energy Forum in Johannesburg (2015) and although the revised requirements are still a work in progress and have not yet been ratified, they will inform this assessment where applicable. Please refer to Annexure E1 for a copy of the Avifaunal assessment undertaken for this project.

3.4.14 Environmental Impact Assessment Guideline for Renewable Energy Projects

The Minister of Environmental Affairs published the Environmental Impact Assessment Guideline for Renewable Energy in terms of section 24J of the National Environmental Management Act, 1998 (Act No. 107 of 1998) on 16 October 2016.

In pursuit of promoting the country’s Renewable Energy development imperatives, the Government has been actively encouraging the role of Independent Power Producers (IPPs) to feed into the national grid. Through its REIPPPP, the DoE has been engaging with the sector in order to strengthen the role of IPPs in renewable energy development. Launched during 2011, the REIPPPP is designed so as to contribute towards a target of 3 725MW, and towards socio-economic and environmentally sustainable development, as well as to further stimulate the renewable industry in South Africa.

In order to facilitate the development of the first phase of IPPs in South Africa, these guidelines have been written to assist project planning, financing, permitting, and implementation for both developers and regulators. The guideline is principally intended for use by the following stakeholder groups:

- Public Sector Authorities (as regulator and/or competent authority);
- Joint public sector authorities and project funders, e.g., Eskom, IDC, etc.
- Private Sector Entities (as project funder/developer/consultant);
- Other interested and affected parties (as determined by the project location and/or scope).

This guideline aims to ensure that all potential environmental issues pertaining to renewable energy projects are adequately and timeously assessed and addressed as necessary so as to ensure sustainable roll-out of these technologies by creating a better understanding of the environmental approval process for renewable energy projects.

The guidelines list the following possible environmental impacts associated with the development of solar energy facilities.

Table 11: Potential environmental impacts of solar energy projects (Adapted from DEA, 2015) showing where they have been considered in this report

| Impact Description | Relevant Legislation | Applicability to this project |
|--------------------|----------------------|---|
| Visual Impact | NEMA | Specialist input attached in Annexure E6. |

| Impact Description | Relevant Legislation | Applicability to this project |
|--|--------------------------|---|
| Noise Impact (CSP) | NEMA | Not applicable, as CSP is not considered as a technology alternative. |
| Land Use Transformation (fuel growth and production) | NEMA, NEMPAA, NHRA | Not Applicable to PV. Agricultural specialist input however attached in Annexure E3 |
| Impacts on Cultural Heritage | NEMA, NHRA | Heritage impact assessment attached in Annexure E4. |
| Impacts on Biodiversity – | NEMA, NEMBA, NEMPAA, NFA | Biodiversity specialist input attached in Annexure E1 and E2 (Ecology and Freshwater respectively) |
| Impacts on Water Resources – | NEMA, NEMICMA, NWA, WSA | The project will obtain water directly from the local municipality. A freshwater ecologist has assessed the potential impacts on freshwater resources (Annexure E2). |
| Hazardous Waste Generation (CSP and PV) | NEMA, NEMWA, HAS | The EMPr makes provision for damaged and defunct PV infrastructure for dismantling and re-use. |
| Electromagnetic Interference | NEMA | The nearest SKA station has been identified as Rem-Opt-9, at approximately 30km from the proposed Bloemsmond 4. SKA have confirmed that this project will not cause any detrimental impacts to SKA infrastructure, please refer to annexure f5 for a copy of this confirmation.. |
| Aircraft Interference | NEMA, MSA | The SA CAA have been automatically registered as an interested and affected party on this environmental process. There are no airports nor landing strips in the vicinity of the proposed site. |
| Loss of Agricultural Land | SALA | Agricultural specialist input is attached in Annexure E3 |
| Sterilisation of mineral resources | MPRDA | The Department of Mineral Resources has been registered as an I&AP on this environmental process. |

Assuming an IPP project triggers the need for BA or S&EIR under the EIA regulations, included in the assessment process is the preparation of an environmental management programme (EMPr). Project-specific measures designed to mitigate negative impacts and enhance positive impacts should be informed by good industry practice and are to be included in the EMPr. Potential mitigation measures for solar energy projects include but are not limited to:

- Conduct pre-disturbance surveys as appropriate to assess the presence of sensitive areas, fauna, flora and sensitive habitats;
- Plan visual impact reduction measures such as natural (vegetation and topography) and engineered (berms, fences, and shades, etc.) screens and buffers;
- Utilise existing roads and servitudes as much as possible to minimise project footprint;
- Site projects to avoid construction too near pristine natural areas and communities;
- Locate developments away from important habitat for faunal species, particularly species which are threatened or have restricted ranges, and are collision-prone or vulnerable to disturbance, displacement and/or habitat loss;
- Fence sites as appropriate to ensure safe restricted access;
- Ensure dust abatement measures are in place during and post construction;
- Develop and implement a storm water management plan;
- Develop and implement waste management plan; and
- Re-vegetation with appropriate indigenous species to prevent dust and erosion, as well as establishment of alien species.

The recommendations of these guidelines have been explicitly considered in this scoping process and where necessary, additional specialist input has been obtained. Please see section 6 of this BAR for a full assessment of impacts.

3.4.15 Sustainability Imperative

The norm implicit to our environmental law is the notion of sustainable development (“SD”). SD and sustainable use and exploitation of natural resources are at the core of the protection of the environment. SD is generally accepted to mean development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs. The evolving elements of the concept of SD *inter alia* include the right to develop; the pursuit of equity in the use and allocation of natural resources (the principle of intra-generational equity) and the need to preserve natural resources for the benefit of present and future generations. Economic development, social development and the protection of the environment are considered the pillars of SD (the triple bottom line).

“Man-land relationships require a holistic perspective, an ability to appreciate the many aspects that make up the real problems. Sustainable planning has to confront the physical, social, environmental and economic challenges and conflicting aspirations of local communities. The imperative of sustainable planning translates into notions of striking a balance between the many competing interests in the ecological, economic and social fields in a planned manner. The ‘triple bottom line’ objectives of sustainable planning and development should be understood in terms of economic efficiency (employment and economic growth), social equity (human needs) and ecological integrity (ecological capital).”

As was pointed out by the Constitutional Court, SD does not require the cessation of socio-economic development but seeks to regulate the manner in which it takes place. The idea that developmental and environmental protection must be reconciled is central to the concept of SD - it implies the accommodation, reconciliation and (in some instances) integration between economic development, social development and environmental protection. It is regarded as providing a “conceptual bridge” between the right to social and economic development, and the need to protect the environment.

Our Constitutional Court has pointed out that the requirement that environmental authorities must place people and their needs at the forefront of their concern so that environmental management can serve their developmental, cultural and social interests, can be achieved if a development is

sustainable. *“The very idea of sustainability implies continuity. It reflects the concern for social and developmental equity between generations, a concern that must logically be extended to equity within each generation. This concern is reflected in the principles of inter-generational and intra-generational equity which are embodied in both section 24 of the Constitution and the principles of environmental management contained in NEMA.”* [Emphasis added.]

In terms of NEMA sustainable development requires the integration of the relevant factors, the purpose of which is *to ensure that development serves present and future generations.*¹⁸

It is believed that the proposed 100MW Bloemsmond 4 Solar supports the notion of sustainable development by presenting a reasonable and feasible alternative to the existing vacant land use type, which has limited agricultural potential due the lack of water and infrastructure.

Furthermore the proposed alternative energy project (reliant on a natural renewable resource – solar energy) is in line with the national and global goal of reducing reliance on fossil fuels, thereby providing long-term benefits to future generations in a sustainable manner.

4. PLANNING CONTEXT

A Planning specialist will be appointed in order to submit application in terms of the relevant planning legislation for the proposed facility. The following key components will likely take place from a planning perspective.

- A **land use change application** for the rezoning of approximately 275ha, from **Agricultural Zone I to Special Zone**, will be lodged at the Kai !Garib Local Municipality, in accordance with the Northern Cape Planning and Development Act (Act 7 of 1998).
- If there are restrictive Title Deed conditions burdening the proposed development, an application for the removal thereof will be lodged at the Government of the Northern Cape Province, Department: Corporate Governance and Traditional Affairs, in accordance with the Removal of Title Deed Restriction Act (Act 84 of 1967).
- Parallel to the rezoning application, a **long term lease application will be lodged at the National Department of Agriculture**, in accordance with the Subdivision of Agricultural Land Act (Act 70 of 1970).
- Relevant planning documents, on all spheres of Government, will be evaluated before any land use change application is launched. These documents include, but are not limited to the following: **NSDP** (National Spatial Development Perspective); **PGDS NC** (Provincial Growth and Development Strategy), Northern Cape Province; **IDP** (Integrated Development Plan); **SDF** (Spatial Development Framework).

The planning specialist will furthermore likely engage with the following authorities as part of the planning process.

- Kai !Garib Municipality for approval in terms of the relevant Zoning Scheme;

Where relevant, these authorities will also be engaged with as part of the EIA Process and will be given an opportunity to provide input and comment on this

- Northern Cape Department of Agriculture as well as the National Department of Agriculture, Forestry & Fisheries (DAFF) for approval in terms of Act 70 of 70 (SALA) and Act 43 of 83(CARA);
- District Roads Engineer;
- Department of Water and Sanitation (DWS) for comment in terms of the National Water Act;

¹⁸ Refer to definition of “sustainable development” in section 1 of NEMA.

- Department of Mineral Resources for approval in terms of Section 53 of Act 28 of 2002;
- Department of Transport & Public Works;
- South African Heritage Resource Agency (SAHRA) ;
- Civil Aviation Authority;
- Eskom Northern Cape; and
- Northern Cape Nature Conservation.

5. SITE DESCRIPTION AND ATTRIBUTES

The following sections provide a description of the natural environmental and built environment context of the Portion 5 and Portion 14 of the Farm Bloemmsmond 455, with particular focus on the site location for the proposed Bloemsmond 4.

5.1 LOCATION & BUILT ENVIRONMENT

The target property, Portion 5 and Portion 14 of the Farm Bloemsmond 455 , is located in the ZF Mgcauw District (previously Siyanda District) of the Northern Cape Province, within the jurisdiction area of the Kai !Garib Local Municipality. The combined size of the properties is approximately 4829.81 in size and is located approximately 15km East of Keimoes.

The proposed Bloemsmond 4 is accessed and is situated directly north of the N14.

No buildings, ruins or any other structures were noted on or within the direct proximity of the proposed Bloemsmond 4 site.

5.2 GEOLOGY & CLIMATE

The following information relating to geology and climate was obtained from the Agricultural Specialist; please refer to Annexure E3 for a full copy of his report.

5.2.1 Geology & Soils

The area lies in the Kalahari geological group of the Namaqualand metamorphic complex. This is the youngest of the geological groups formed in the past 65 million years. The lithology (mineralogical composition and texture of rocks) of this area consists of:

5.2.1.1 Sand

During a very dry period in Southern Africa some 100 000 years ago sand was transported from the Namib dessert by strong and continuous winds and distributed over the Kalahari.

5.2.1.2 Limestone

Limestone is a sedimentary rock consisting largely of calcium-carbonate, which is usually derived from the shells of minute marine or fresh-water animals. Sand, clay and minerals such as magnesia or iron oxide are also present.

Sedimentary and Volcanic rocks (parent material of soils) found in the area include Migmatite, Schist, Gneiss, Kinzigite and granite.

5.2.1.3 Soil

Calcic soils are prone to develop under the climatic conditions and geology of the area.

Calcic soils originate in arid climates with the accumulation of secondary lime, forming a distinctive horizon consisting chiefly of calcite. In calcic soils either hardpan carbonate or a soft carbonate horizon or (rarely) gypsic horizon dominates the morphology of the sub-soil.

AGIS indicates the typical profile for soils in this region as follows:

- Soils with minimal development, usually shallow, on hard or weathering rock, with or without intermittent diverse soils;
- Lime generally present in part or most of the landscape;
- Red and yellow well drained sandy soil with high base status;
- Freely drained, structure less soils;
- Favourable physical properties; and
- Soils may have restricted soil depth, excessive drainage, high erodibility and low natural fertility.

5.2.2 Climate

The region is classified as an arid zone with desert climate. Specific parameters are shown in the table below.

Table 12: Climatic parameters of associated with Bloemsmond 4.

| Rainfall | |
|--------------------------|-------------------|
| Annual rainfall | 0-200mm |
| Summer rainfall | <62.5mm |
| Winter rainfall | <62.5mm |
| Variation in rainfall | <62.5mm 40 – 50 % |
| Temperature | |
| Mean maximum temperature | >35°C |
| January Temperature | >27.5°C |
| Mean Minimum Temperature | 2-4°C |
| July Temperature | <7.5°C |
| Temperature range | >15°C |
| First frost expected | 21-31 May |
| Last frost expected | 01 – 10 September |
| Hours of sunshine | >80% |
| Evaporation | >2400mm |
| Humidity | <30% |

5.3 TOPOGRAPHY

The land surface of South Africa is divided into 22 physiographic regions, according to topography, altitude and surface form. The site lies on the border of The Southern Kalahari and Bushmanland regions, on the Interior Plateau. The area consists of level plains with some relief. The topography has a slope gradient of less than 5% and a regular shape.

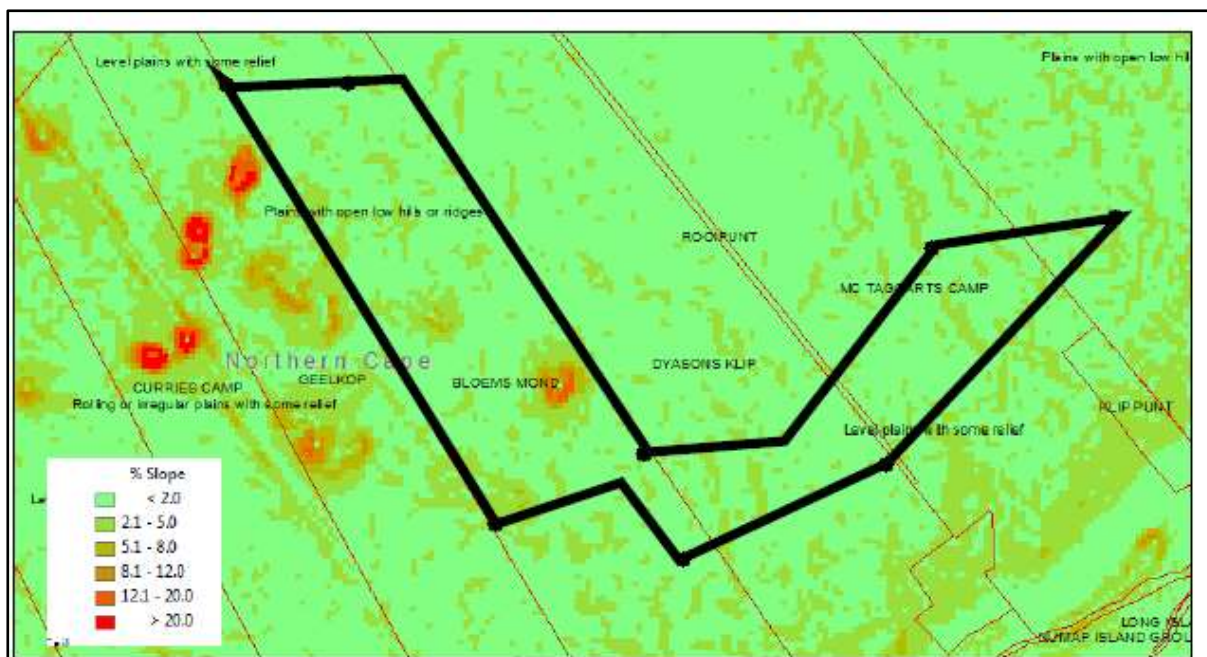


Figure 18: Topographical Map (Lubbe, 2019)

5.4 BOTANICAL COMPOSITION OF THE SITE

Enviro Insight in conjunction with confluent environmental undertook a Botanical Impact Assessment which formed part of larger Ecological Impact Assessment Report. Please refer to the Ecological Impact Assessment attached in **Annexure E1** from which the following has been drawn.

5.4.1 Broad-Scale Vegetation Patterns

The study area is located in the Kalahari Karroid Shrubland (Least threatened) and Bushmanland Arid Grassland¹⁹ (Least threatened) vegetation types. The study area is not located in a threatened ecosystem. The Lower Gariep Alluvial Vegetation threatened ecosystem is located south of the study area.

Kalahari Karroid Shrubland vegetation type is endemic to the Northern Cape Province. The vegetation type is characteristic of forming belts alternating with belts of *Gordonia Duneveld* on plains northwest of Upington through Lutzputs and Noenieput to the Rietfontein/Mier area in the north. Other patches occur around Kakamas and north of Groblershoop. The unit is also found in the neighbouring Namibia. The vegetation can be described as low karroid shrubland on flat, gravel plains. Karoo-related and northern floristic elements such as shrubs meet here, indicating a transition to the Kalahari region and sandy soils. Altitude varies mostly from 700 - 1100 m.

The conservation target is set at 21% with very little statutorily conserved in the Au-grabies Falls National Park. Although only a small area has been transformed many of the belts of this type were preferred routes for early roads, thus promoting the introduction of alien plants (about a quarter of the unit has scattered *Prosopis* species). Erosion is very low (94%) (Mucina & Rutherford, 2012).

Table 13: Attributes of the Kalahari Karroid Shrubland vegetation type.

| | |
|--------------------------------|-----------------------------------|
| Name of vegetation type | Kalahari Karroid Shrubland |
| Code | NKb5 |

¹⁹ Only the Access road crosses Bushmanland Arid Grassland. The PV facility is situated entirely within Kalahari Karroid Shrubland.

| | |
|---|------------------|
| Conservation Target (percent of area) from NSBA | 21% |
| Protected (percent of area) from NSBA | 0.1% |
| Remaining (percent of area) from NSBA | 99.2% |
| Description of conservation status from NSBA | Least threatened |
| Description of the Protection Status from NSBA | Hardly protected |
| Area (km ²) of the full extent of the Vegetation Type | 8283.90 |
| Name of the Biome | Nama-Karoo |

The Bushmanland Arid Grassland vegetation type occurs only in the Northern Cape Province. It spans about one degree of latitude from around Aggeneys in the west to Prieska in the east. The southern border of the unit is formed by edges of the Bushmanland Basin while in the northwest this vegetation unit borders on desert vegetation (northwest of Aggeneys and Pofadder). The northern border (in the vicinity of Upington) and the eastern border (between Upington and Prieska) are formed with often intermingling units of Lower Gariep Broken Veld, Kalahari Karroid Shrubland and Gordonias Duneveld. Most of the western border is formed by the edge of the Namaqualand hills. Altitude varies mostly from 600–1 200m. The conservation target is set at 21% with only small patches statutorily conserved in Augrabies Falls National Park and Goegab Nature Reserve. Very little of the area has been transformed. Erosion is very low (60%) and low (33%) (Mucina & Rutherford, 2012).

Table 14: Attributes of Bushmanland Arid Grassland

| Name of vegetation type | Bushmanland Arid Grassland |
|---|-----------------------------------|
| Code as used in the Book - contains space | NKb3 |
| Conservation Target (percent of area) from NSBA | 21% |
| Protected (percent of area) from NSBA | 0.4% |
| Remaining (percent of area) from NSBA | 99.4% |
| Description of conservation status from NSBA | Least threatened |
| Description of the Protection Status from NSBA | Hardly protected |
| Area (km ²) of the full extent of the Vegetation Type | 45478.96 |
| Name of the Biome | Nama-Karoo |

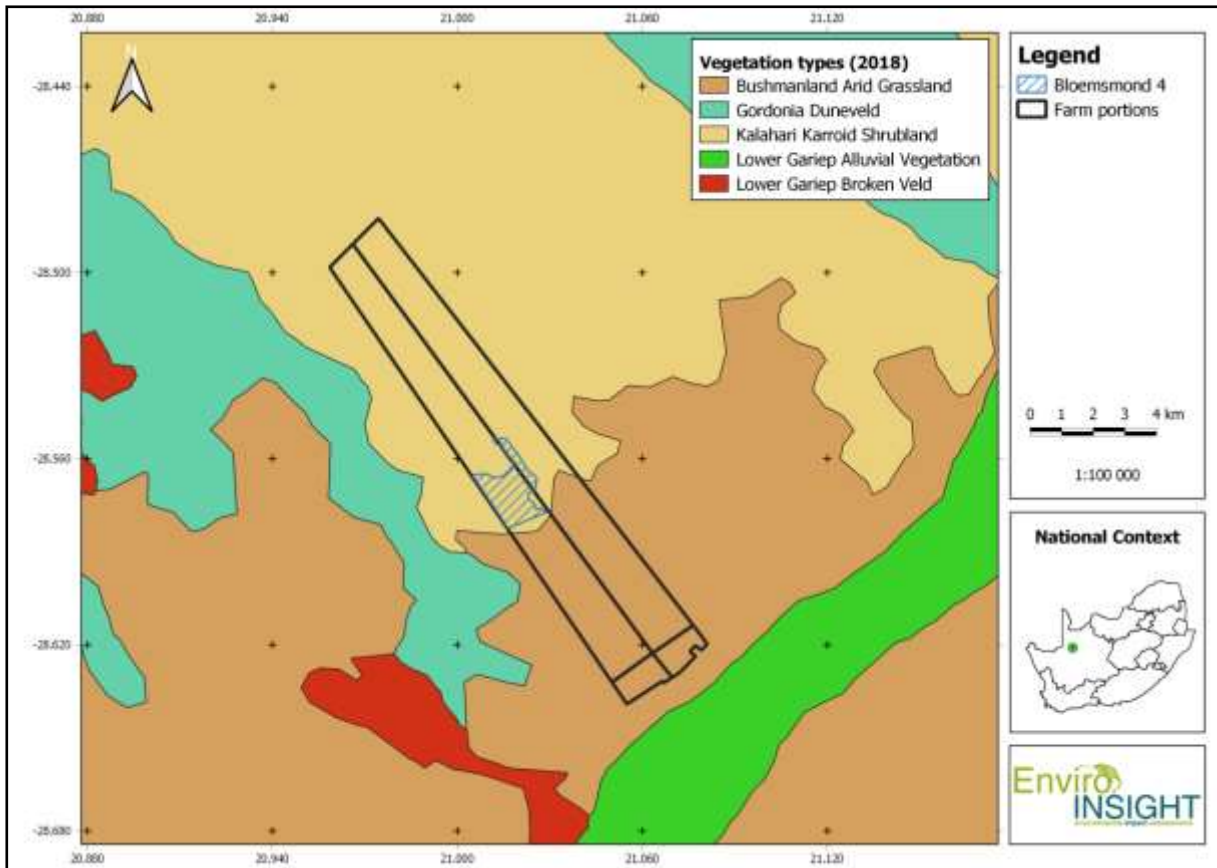


Figure 19: Regional vegetation types in relation to the study area (Mucina & Rutherford, 2012).

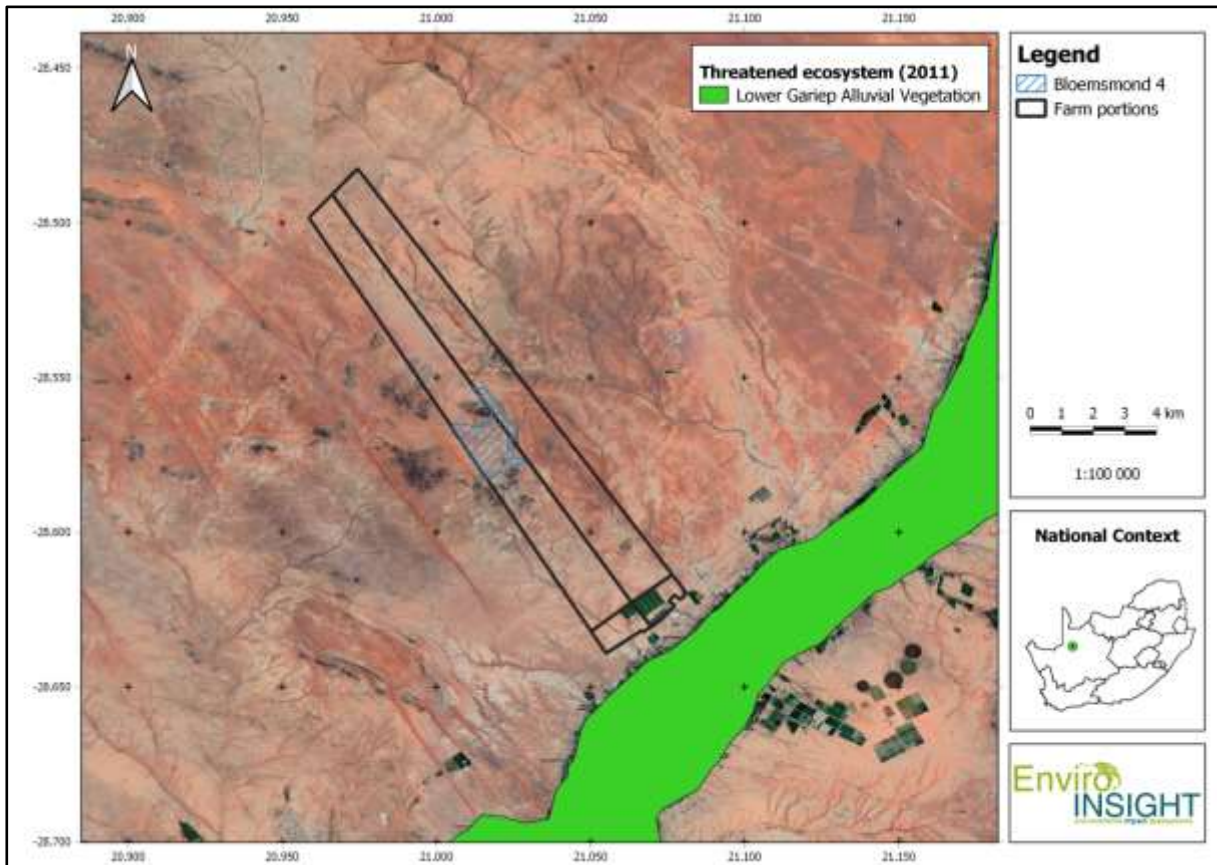


Figure 20: The study area for Bloemsmond 4 in relation to threatened ecosystems.

5.4.2 Habitats & Plant Communities

Based on the outcome of the field study, the botanical specialist identified the following plant communities present within the study site for Bloemsmond 4.

5.4.2.1 Shrubland

This dwarf shrubland is found on the plains between the drainage lines on site. The Shrubland habitat is characterised by shrubs, forbs and succulents characteristic of the Kalahari and sandy soils. A list of species recorded in this habitat is provided in the tables below.

Protected species (for which a permit for removal will be required) include: *Aloe claviflora*, *Avonia albissima*, *Boscia albitrunca*, *Boscia foetida* subsp. *foetida*, *Euphorbia gariiepina* subsp. *gariiepina*, *Mesembryanthemum* sp., *Vachellia erioloba*.

The grass layer is poorly recorded due to a combination of overgrazing and late season sampling.



Figure 21: Vegetation and landscape features of the shrubland.

Table 15: Plant species recorded in the shrubland during the site visit.

| Growth form | Species |
|--------------------|---|
| Trees and shrubs | <i>Boscia albitrunca</i> , <i>Boscia foetida</i> subsp. <i>foetida</i> , <i>Leucosphaera bainesii</i> , <i>Monechma genistifolium</i> subsp. <i>australe</i> , <i>Parkinsonia africana</i> , <i>Prosopis</i> sp. , <i>Rhigozum trichotomum</i> , <i>Searsia pendulina</i> , <i>Senegalia mellifera</i> subsp. <i>detinens</i> , <i>Seriphium plumosum</i> , <i>Vachellia erioloba</i> , <i>Zygophyllum dregeanum</i> |
| Graminoids | <i>Oropetium capense</i> |
| Succulents | <i>Aloe claviflora</i> , <i>Euphorbia gariiepina</i> subsp. <i>gariiepina</i> , <i>Kleinia longiflora</i> , <i>Mesembryanthemum</i> sp., <i>Sansevieria aethiopica</i> , <i>Tylecodon</i> sp. |
| Herbs and creepers | <i>Acanthopsis hoffmannseggiana</i> , <i>Aptosimum albomarginatum</i> , <i>Aptosimum spinescens</i> , <i>Asparagus</i> cf. <i>pearsonii</i> , <i>Avonia albissima</i> , <i>Barleria lichtensteiniana</i> , <i>Barleria rigida</i> , <i>Blepharis mitrata</i> , |

| | |
|--|--|
| | Blepharis sp., Cucumis zeyheri, Harpagophytum procumbens, Tapinanthus oleifolius |
|--|--|

*Medicinal plants; Species indicated in bold are alien invasive species.

5.4.2.2 Drainage Line

This dwarf shrubland is found along the small and narrow ephemeral drainage lines flowing in the landscape. The drainage lines on the footslopes and plains are covered by sandy to sandy loam soils, while higher up it becomes rockier. Typical species are indicated in the table below. Protected species (for which a permit for removal will be required) include: *Boscia albitrunca*, *Boscia foetida* subsp. *foetida*, *Euphorbia gariepina* subsp. *gariepina* and *Vachellia erioloba*.



Figure 22: Vegetation and landscape features of the drainage line..

Table 16: Plant species recorded in the Drainage Line during the site visit.

| Growth form | Species |
|---------------------------|---|
| Trees and shrubs | <i>Boscia albitrunca</i> , <i>Boscia foetida</i> subsp. <i>foetida</i> , <i>Leucosphaera bainesii</i> , <i>Monechma genistifolium</i> subsp. <i>australe</i> , <i>Parkinsonia africana</i> , <i>Rhigozum trichotomum</i> , <i>Searsia pendulina</i> , <i>Senegalia mellifera</i> subsp. <i>detinens</i> , <i>Vachellia erioloba</i> , <i>Zygophyllum dregeanum</i> |
| Graminoids | <i>Stipagrostis namaquensis</i> |
| Succulents | <i>Euphorbia gariepina</i> subsp. <i>gariepina</i> , <i>Kleinia longiflora</i> |
| Herbs and creepers | <i>Acanthopsis hoffmannseggiana</i> , <i>Aptosimum albomarginatum</i> , <i>Aptosimum spinescens</i> , <i>Asparagus</i> cf. <i>pearsonii</i> , <i>Avonia albissima</i> , <i>Barleria lichtensteiniana</i> , <i>Barleria rigida</i> , <i>Blepharis mitrata</i> , <i>Blepharis</i> sp., <i>Cucumis zeyheri</i> , <i>Harpagophytum procumbens</i> , <i>Tapinanthus oleifolius</i> |

5.4.3 Listed and Protected Plant Species

According to the Botanical Database of Southern Africa (BODATSA)²⁰ for the xMin, yMin 20.20°,-29.20°: xMax, yMax 21.4°, -28.20° extent (WGS84 datum) four Red List species are present. In addition, six species are protected under the Northern Cape Nature Conservation Act (Act No 9 of 2009) of which two species are protected under the National Forest Act (Act No 84 of 1998). All potential Red and Orange Listed plant species are indicated in the table below.

The SANBI Red Listed species *Aloidendron dichotomum* was recorded on site. Climate change models project a 36% decline in range in 100 years, assuming dispersal into newly suitable areas. Patterns of modelled declines have been supported by field and repeat photo studies. However no colonization of newly suitable areas has yet happened. Without dispersal, the models predict a 73% decline in 100 years, qualifying the species as Endangered. This is a vital flagship species for climate change impacts on biodiversity. It is also likely to be a keystone and umbrella species. This species is not likely to be more sensitive to climate change than others. Foden's study has shown that this species is a useful indicator of climate change and that, because modelled and actual mortality are shown to be relatively similar, the modelled future range shifts need to be seriously considered (Foden 2002, Foden et al. 2007). We have assessed this species based on the modelled future range shifts. Main threats include climate change, harvesting and trampling by livestock. Damage by baboons, scale insects and fungus has been observed, but none of these seem to cause mortality. There is a large amount of morphological variation between populations. Genetic studies show that there is much genetic variation between populations. Degree of interbreeding between populations is unknown, but large dispersal distance and bird pollinators make genetic exchange seem likely. The population is declining due to mortality of individuals in northern subpopulations.

Potential plant species of conservation concern.

| Species | SANBI National Red List ²¹ | Northern Cape Protected ²² | National Forest Act (1998) ²³ | Habitat Description | Present on site |
|-------------------------------------|--|---------------------------------------|--|--|-----------------|
| <i>Acanthopsis hoffmannseggiana</i> | Data deficient - Taxonomically Problematic | | | Sandy plains, stony hillsides and ridges, usually associated with weathered quartzite and granite, but also occurs on mudstone (in Prince Albert area) and limestone (Asbestos Mountains), usually at an elevation between 650 and 1000 m. | Yes |
| <i>Aloe claviflora</i> | Least Concern | Yes | | Well drained areas on rocky slopes or flat stony areas at the margins of Kalahari Thornveld. Usually, but not always, on calcrete | Yes |
| <i>Aloidendron dichotomum</i> | Vulnerable | | | On north-facing rocky slopes (particularly dolomite) in the south of its range. Any slopes and | Yes |

²⁰ <http://posa.sanbi.org/sanbi/Explore>

²¹ <http://redlist.sanbi.org/>

²² Northern Cape Nature Conservation Act (Act No 9 of 2009)

²³ Notice of the list of protected tree species under the National Forests Act 84 of 1998 published in GN 182 in GG 41100 of 8 September 2017

| Species | SANBI National Red List ²¹ | Northern Cape Protected ²² | National Forest Act (1998) ²³ | Habitat Description | Present on site |
|---------------------------------|---------------------------------------|---------------------------------------|--|---|---|
| | | | | sandy flats in the central and northern parts of range. | |
| <i>Anacampseros albissima</i> | Least Concern | Yes | | Rock outcrops and quartz flats. Southern Angola through Namibia to the Richtersveld, and eastwards through Bushmanland to Griqualand West. | Within portions 5 & 14 of the Farm Bloemsmond 455. |
| <i>Boscia albitrunca</i> | Least Concern | Yes | Yes | Terrestrial – including seven provinces excluding Western and Eastern Cape | Within portions 5 & 14 of the Farm Bloemsmond 455. |
| <i>Boscia foetida</i> | Least Concern | Yes | | Terrestrial – Northern Cape | Within portions 5 & 14 of the Farm Bloemsmond 455. |
| <i>Dinteranthus wilmotianus</i> | Near Threatened | | | Alluvial gravel soils – desert, Nama Karoo | Within portions 5 & 14 of the Farm Bloemsmond 455. High likelihood to occur in study area |
| <i>Felicia deserti</i> | Data deficient | | | Terrestrial – Nama Karoo, Succulent Karoo | Possible |
| <i>Hoodia gordonii</i> | Least Concern | Yes | | Occurs in a wide variety of arid habitats from coastal to mountainous, also on gentle to steep shale ridges, found from dry, rocky places to sandy spots in riverbeds – Desert, Nama Karoo, Savanna, Succulent Karoo. | Within portions 5 & 14 of the Farm Bloemsmond 455. High likelihood to occur in study area |
| <i>Vachellia erioloba</i> | Least Concern | Yes | Yes | Widespread in the arid northern provinces of South Africa, also Namibia, Botswana, Zimbabwe, southern Angola and south-western Zambia | Within portion 5 & 14 of the Farm Bloemsmond 455. |

5.5 FAUNAL COMPONENT OF THE SITE

Enviro Insight in conjunction with confluent environmental undertook a Botanical Impact Assessment which formed part of larger Ecological Impact Assessment Report. Please refer to the Ecological Impact Assessment attached in **Annexure E1** from which the following has been drawn.

5.5.1 Mammals

Of the observed and expected mammal species, the black-footed cat *Felis nigripes* (expected) is listed as Vulnerable while the honey badger *Mellivora capensis* (observed in the current study) was listed as Near Threatened (IUCN 2015) but as of 2016, has been downgraded to Least Concern; it is however still NEMBA protected. The Cape fox (*Vulpes chama*) (observed during the current survey) is also protected by the NEMBA.

Three of the observed mammal species within the study areas are Red-Listed in South Africa and two species are protected by NEMBA. These species are discussed below and the probability of occurrence for selected threatened and near threatened mammal species on the respective study areas is shown in the table below.

Table 17: The probability of occurrence²⁴ for selected threatened and near threatened mammal taxa by study area

| Species | Bloemsmond 4 |
|--|--------------|
| <i>Felis nigripes</i> (Small-spotted/black footed cat) | Low |
| <i>Vulpes chama</i> (Cape fox) | Confirmed |
| <i>Mellivora capensis</i> (Honey Badger) | Low |

5.5.1.1 Honey Badger (*Mellivora capensis*)

Honey badgers were recorded once through spoor tracking within the drainage line habitat of the study area. Their presence is unusual even though the study area does not represent a stronghold for the species. This species is often associated with more savanna type habitats encountered in the Kalahari and Bushveld which is represented in the drainage line habitat (and not the more karroid habitats to the north). It is often subject to snaring and persecution due to its penchant for raiding commercial honey farms and chicken breeding facilities. The presence of honey badgers in the study area should be considered as a healthy ecological indicator and the NEMBA protection warrants due consideration.

5.5.1.2 Small-spotted cat (*Felis nigripes*)

This cat species is a relatively uncommon resident that is nationally protected. It was not observed during the survey period but is predicted to be resident within suitable habitats within the surrounding study areas, mostly associated with termitaria. Termitaria represent one of the most important micro habitat types within the greater study area and should form the cornerstone of the mitigation measures to ensure protection for this species.

5.5.1.3 Cape fox (*Vulpes chama*)

This canid species is a relatively uncommon resident that is nationally protected. The stronghold of this species is centered around more arid savanna systems and the Mpumalanga grassland habitats. It was not sighted during the survey period although road kill was seen within the greater study area. Despite widespread and intensive persecution by farmers, it is a relatively common species throughout its range and can be considered to be relatively resilient to impacts.

5.5.2 Mammalian Importance

Mammalian importance relates to species diversity, endemism and the presence of topographical features or primary habitat units with the intrinsic ability to sustain mammal species of conservation importance. It is clear that throughout the study areas most of the habitats are generic in their ability to support the prevailing mammal population, including species of conservation concern. With the

²⁴High: regular, expected to be present daily/weekly, Moderate: uncommon but expected to be present at least once a month Low: irregular or occasional to very rare

exception of inselberg ridges, no unique geographical or topographical features exist which would cause the areas targeted for solar farms to be classified as a “No Go” area. Therefore, the region as a whole is considered to be an area of medium mammalian importance although the study areas should still be managed in a holistic manner at a policy level, prioritising general best practice (not fatal flaw or high sensitivity related) mitigation and monitoring of mammal species, both general and of conservation concern.

Areas with elevated mammal sensitivities include inselberg ridges, seasonal drainage lines, artificial impoundments and windmills. The seasonal drainage lines act as linear dispersal corridors for mammal species. Greater species diversity (as well as a unique composition) was observed in this habitat and therefore, these systems are earmarked as being of high mammal importance. It must be noted that this elevated diversity could also be attributed to the highly trackable substrate within the drainage line making the detection of mammal species through spoor tracking easier. However, the probability is high that the corridor potential of the habitat type acts as a factor increasing the presence of mammal species. Intermittent impoundments and water sources throughout a region that is inherently arid is an obvious cause for increased mammal diversity, density and therefore sensitivity within these habitat types, due to the inherent water dependence of the taxonomic group as well as the increased foraging potential of the ecosystem. The presence of impenetrable fences also limits migration and dispersal making enclosed populations totally dependent on these water points. Finally, the ridge systems (connected or otherwise) may not provide habitat for mammal SCC but are a crucial source of food for avifaunal SCC which rely on small to medium mammals as the cornerstone of their prey base. Therefore, these systems are unique in the landscape and must be subject to appropriate buffering.

5.5.3 Herpetofauna

The study area resides on the 2821CA and 2820DB QDGC's. These QDGC's along with ten adjacent cells (2820BC, 2820BD, 2821AC, 2821AD, 2821CB, 2821CD, 2821CC, 2820DD, 2820DB) were considered to represent similar habitats and therefore the predicted species list was derived from observation records from these QDGCs. Expected species lists derived in this manner may therefore represent an overestimation of the diversity expected as very specific habitat types may be required by a species which may be present in a QDGC but not necessarily on the study site within the QDGC. Conversely, many large areas in South Africa are poorly sampled for herpetofauna and expected species lists derived from a single QDGC may therefore underestimate the species diversity. Drawing expected species from surrounding QDGCs therefore increases the likelihood of obtaining a species list that suffers less from poor sampling in the area but it also artificially inflates the expected number of species because many different habitats in the surrounding QDGCs may not be present on the study site. To counteract this, all possible attempts were made to refine the expected species list based on species-specific habitat requirements and a good understanding of the habitat types and quality of the study site. Species that are unlikely to occur on the study site but that do occur in the surrounding QDGCs were kept in the expected species list (precautionary principle) and species with a high probability of occurrence on the study site were added to the list even if ReptileMAP (2019) and FrogMAP (2019) did not have a record for the selected QDGCs.

The QDGC's near the project area are poorly sampled, and are characterised by moderate diversity and low endemism for reptiles and low diversity and endemism for amphibians (FrogMAP, 2019; ReptileMAP, 2019).

The herpetofauna species list derived from records collected for the QDGCs is presented in **Error! eference source not found.** 4 of the Ecological Impact assessment attached in Annexure E1. Five amphibian species have previously been recorded within and surrounding the project area. A total of 59 reptile species could potentially occur within and surrounding the project area although only twelve have previously been recorded from within 2821CA QDGC.

The site intersects multiple habitat features, such as boulders, gravel plains and dry river beds and arid living rupicolous and some arenicolous reptile species are therefore expected to be present in the project area. However, the project area is situated adjacent to the Orange River, which is suitable habitat for mesic herpetofauna assemblages, but the habitat is unsuitable for such species, which may temporarily persist or pass through the project area.

No threatened (CR, EN or VU) herpetofauna are expected to occur within the project area and no other SCC are expected to be resident or breeding within the project area. However, there are two NT species that may occur within and surrounding the project area, as follows:

5.5.3.1 Giant Bullfrog (*Pyxicephalus adspersus*)

The Giant Bullfrog is listed by Minter et al. (2004) as Near Threatened. However, the IUCN (2019) considers this species to be of Least Concern across its global distribution. This species may undergo an escalation in conservation status soon and must pre-emptively be considered to be of conservation importance. This species has not been recorded in 2821CA in which the project area is situated, but has been observed in adjacent QDGCs (FrogMAP, 2019). In arid regions Giant Bullfrogs utilise small pans that are difficult to detect without heavy rainfall, it is likely that suitable breeding habitat occurs within the project area.

5.5.3.2 Verrox's Tent Tortoise (*Psammobates tentorius verroxii*)

Although Verrox's Tent Tortoise is listed by Bates et al. (2014) as Least Concern, the IUCN (2019) considers the species to be Near Threatened. This small, scarce tortoise species is rarely seen. It is active in early mornings and evenings during the wet season when it feeds on succulents and perennial plants, but burrow beneath the base of shrubs during dry spells. This tortoise species has been recorded in the 2821CA QDGC on which the project area is situated (ReptileMAP, 2019). It is likely to be a permanent resident within the project area.

5.5.4 Avifaunal Component of the Study Site

A desktop study was undertaken in which bird species that could potentially occur in the vicinity of the study area were identified using data from the second South African Bird Atlas Project (SABAP 2; [SABAP2, 2019]). An approach was adopted to ensure that all species potentially occurring within the study area, whether resident, nomadic, or migratory, are identified.

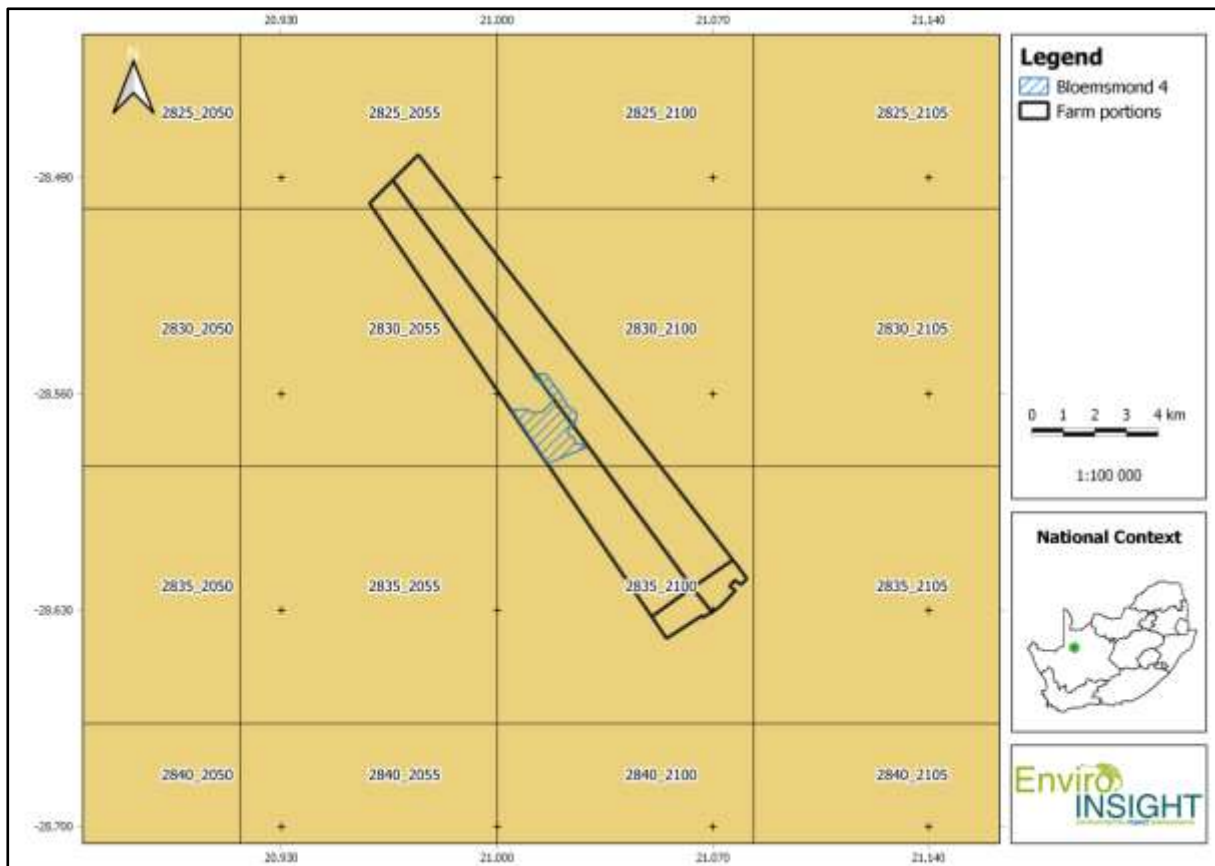


Figure 23: The study area for Bloemsmond 4 in relation to the SABAP2 pentads (Enviro Insight, 2019)

The following main literature sources were consulted by the specialist for the avifauna study:

- Information relating to avifauna species of conservation concern (SCC) was obtained from the Southern Africa Bird Atlas Project (SABAP 2, 2019), Hockey *et al.* (2005) and Taylor *et al.* (2015);
- Hockey *et al.* (2005) were consulted for general information on the life history attributes of relevant bird species;
- The conservation status of bird species is categorised according to Taylor *et al.* (2015) the IUCN Red List of threatened species (IUCN, 2019); and
- Avifaunal Impact Assessment: Proposed construction of the AEP Bloemsmond Solar 2 Photovoltaic (PV) facility and associated infrastructure, Kai !Garib Local Municipality (Widdows 2015).

The desktop assessment referred to above was supplemented by a detailed field assessment.

The specialist recorded 75 species in relatively suboptimal conditions. Many of the bird species expected and observed in the study areas (most of them non passerines) are dependent upon local availability of suitable habitat or food and their presence is not directly determined by the surrounding indigenous vegetation. In addition, many of the recorded birds were represented by highly mobile species, able to move around to areas where rain has fallen. These include several of the lark species, finchlarks, canaries and buntings. Several of these mobile species form flocks. This is another key conclusion that has shown that the avifaunal assemblages are dictated by optimal conditions, rather than prevailing habitat types. However, distinct groupings of bird species were observed in some more “unique” habitat types such as the rocky ridges and large drainage lines. For the purposes of this study, the discussion will focus on SCC.

The most abundant species was Scaly-feathered Finch *Sporopipes squamifrons*, with a relative abundance of 25.0 birds/km. Other common species which occurred at significantly lower abundances included Black-chested Prinia *Prinia flavicans* (7.7 birds/km), Kalahari Scrub-robin (6.7 birds/km), and Chestnut-vented Warbler *Sylvia subcaeruleum* (6.1 birds/km). These three species were markedly more common than the next most abundant species such as Cape Turtle-dove *Streptopelia capicola*, Namaqua Dove *Oena capensis* and Fawn-coloured Lark *Calendulauda africanoides*. The remaining species all had relative abundances of less than two birds/km.

Some species showed rather clear preferences for parts of the study area. Northern Black Korhaan *Afrotis afraoides* was found exclusively in the eastern half of the site, which is less dense with fewer woody plant species and a more expansive grass layer. The Red-crested Korhaan *Lophotis ruficrista*, which prefers more closed woodland, showed the opposite trend, being detected only within the woodier western half of the site. Amongst the passerines, Desert Cisticola *Cisticola aridulus*, Fawn-coloured Lark *Calendulauda africanoides*, and White-browed Sparrow-weaver *Plocepasser mahali* also showed a distinct preference for the less woody eastern half of the site.

Red-listed species are considered fundamental to this study, because of their susceptibility to the various threats posed by solar facilities and associated infrastructures. Only six species that have been recorded in the area are threatened, while one other species is considered Near-Threatened. The most important of these is the Critically Endangered White-backed Vulture *Gyps africanus*, which has been recorded in the area previously during SABAP2 and hence has a high probability of occurring again. Two Red-listed species were recorded during the field survey, a pair of Verreaux's Eagle *Aquila verreauxii* (Vulnerable) and a single Lanner Falcon *Falco biarmicus* (Vulnerable). Both species were considered to have a high likelihood of occurring in the area. Another species of concern that may have a high probability of occurring in the study area is the Martial Eagle *Polemaetus bellicosus* (Endangered). The local populations of these species are, however, mostly of moderate importance, as the study site and surrounds most likely serve as only part of the foraging range of occasional individuals passing through.

An additional three species which have not yet been recorded in the area, but have a moderate probability of occurring, are also considered. These include the Tawny Eagle *Aquila rapax* (Endangered), Secretarybird *Sagittarius serpentarius* (Vulnerable) and the European Roller *Coracias garrulus* (Near-Threatened). The Kori Bustard *Ardeotis kori* (Near-threatened) was recorded during SABAP1 and therefore has a moderate probability of occurring again, especially considering that the species favours open savanna as characterised by the study area.

Other red-listed species which may occur with negligible frequency and therefore are of less concern include the Vulnerable Black Stork *Ciconia nigra* and Burchell's Courser *Cursorius rufus*. The lack of suitable microhabitats such as water bodies and shrubland plains, respectively, will in all likelihood exclude these species from the site.

Table 18: Red-listed species recorded in the study area

| English name | Taxonomic name | Red-list status | Estimated importance of local population | Probability of occurrence | Threats |
|-----------------------|------------------------------|-----------------------|--|---------------------------|--|
| Vulture, White-backed | <i>Gyps africanus</i> | Critically Endangered | Low | High | Habitat loss/Disturbance Collisions/Electrocution |
| Eagle, Martial | <i>Polemaetus bellicosus</i> | Endangered | Moderate | High | Habitat loss/Disturbance Collisions/Electrocution |
| Eagle, Tawny | <i>Aquila rapax</i> | Endangered | Low | Moderate | Habitat loss/Disturbance Collisions/Electrocution |
| Courser, Burchell's | <i>Cursorius rufus</i> | Vulnerable | Low | Low | Habitat loss/Disturbance |

| English name | Taxonomic name | Red-list status | Estimated importance of local population | Probability of occurrence | Threats |
|-------------------|---------------------------------|-----------------|--|---------------------------|--|
| Eagle, Verreaux's | <i>Aquila verreauxii</i> | Vulnerable | Moderate | Recorded | Habitat loss/Disturbance Collisions/Electrocution |
| Falcon, Lanner | <i>Falco biarmicus</i> | Vulnerable | Moderate | Recorded | Habitat loss/Disturbance Collisions/Electrocution |
| Secretarybird | <i>Sagittarius serpentarius</i> | Vulnerable | Low | Moderate | Habitat loss/Disturbance Collisions |
| Stork, Black | <i>Ciconia nigra</i> | Vulnerable | Low | Low | Collisions |
| Bustard, Kori | <i>Ardeotis kori</i> | Near-threatened | Moderate | Moderate | Habitat loss/Disturbance Collisions |
| Roller, European | <i>Coracias garrulus</i> | Near-Threatened | Low | Moderate | Habitat loss/Disturbance |

During the walking transects regular scans were made to detect any large flying birds to establish the presence of flight paths across the study site. Aside from the pair of Verreaux's Eagle seen soaring over the area at a height of approximately 150 to 200m, only Gabar Goshawk Melierax gabar was seen flying within the study area on one occasion. The Lanner Falcon was seen perched on the large power line on the southern boundary of the site, possibly using the pylons as vantage points during hunting forays. This power line was also observed from the study area at various times during the day on three consecutive days to determine whether it is used by large raptors and vultures. No other red-listed species or any other large birds were seen using the pylon structures for roosting or hunting during the period of the site visit, although this does not exclude the possibility that birds may use these structures at other times of the year. No nest or communal nesting sites of red-listed species were found in the study area during the site visit, which could be due to the absence of suitably large trees in the area. These observations seem to suggest that red-listed or large communal species are not currently using the study area or parts thereof for roosting or nesting.

In essence, much of the avifauna within the study area appears similar to that found across the Kalahari bioregion of the Northern Cape. The apparent lack of red-listed species in the area could be attributed to their naturally low densities and large ranges (eagles and Secretarybird), the absence of suitable habitat (Black Stork and Burchell's Courser) and nesting/roosting trees (White-backed Vulture). However, certain species may use the study area on occasion as part of their large ranges, such as Martial Eagle and Kori Bustard, as well as the unreported Tawny Eagle and Secretarybird. However, since the study area appears not to directly support large and healthy populations of red-listed species, the sensitivity of the study area in general can be considered to be of medium significance with respect to avifauna.

5.6 SOCIO ECONOMIC CONTEXT

This section provides an overview of the spatial context of the Province, District Municipality, and Local Municipality within which Bloemsmond 4 is proposed for development, and provides the socio-economic basis against which potential issues can be identified.

5.6.1 Spatial Context of the Northern Cape Province

The Northern Cape Province is located in the north-western extent of South Africa and comprises South Africa's largest province; occupying an area 372 889km² in extent, equivalent to nearly a third (30.5%) of the country's total land mass. It is also South Africa's most sparsely populated province

with a population of 1 145 861, and a population density of 3.1/km². It is bordered by the Provinces of Western Cape, and Eastern Cape Provinces to the south, and south-east; Free State, and North West Provinces to the east; Botswana and Namibia, to the north; and the Atlantic Ocean to the west. The Northern Cape is the only South African province which borders Namibia, and therefore plays an important role in terms of providing linkages between Namibia and the rest of South Africa. The Orange River is a significant feature, and is also the main source of water in the Province, while also constituting the international border between the Northern Cape and Namibia.

The Northern Cape offers unique tourism opportunities including wildlife conservation destinations, natural features, historic sites, festivals, cultural sites, stars gazing, adventure tourism, agricultural tourism, ecotourism, game farms, and hunting areas, etc. The Province is home to the Richtersveld Botanical and Landscape World Heritage Site, which comprises a United Nations Educational, Scientific and Cultural Organisation (UNESCO) World Heritage Site under the World Heritage Convention. The Northern Cape is also home to 2 Transfrontier National Parks, namely the Kgalagadi Transfrontier Park, and the Richtersveld /Ai-Ais Transfrontier Park, as well as 5 national parks, and 6 provincial reserves.

The Northern Cape also plays a significant role in South Africa's science and technology sector, as it is home to the SKA, the SALT, and the MeerKAT.

The Northern Cape makes the smallest contribution to South Africa's economy (contributing only 2% to South Africa's Gross Domestic Product per region (GDP-R) in 2007). At 26% the mining sector is the largest contributor to the provincial GDP. The Northern Cape's mining industry is of national and international importance, as it produces approximately 37% of South Africa's diamond output, 44% of its zinc, 70% of its silver, 84% of its iron-ore, 93% of its lead and 99% of its manganese.

In 2007 the agricultural sector contributed 5.8% to the Northern Cape GDP per region which was equivalent to approximately R1.3 billion. The agricultural sector also employs approximately 19.5% of the total formally employed individuals (LED Strategy). The sector is experiencing significant growth in value-added activities, including game-farming; while food production and processing for the local and export market is also growing significantly (PGDS, July 2011). Approximately 96% of the land is used for stock farming; including beef cattle and sheep or goats, as well as game farming; while approximately 2% of the province is used for crop farming, mainly under irrigation in the Orange River Valley and Vaalharts Irrigation Scheme (LED Strategy).

5.6.2 Spatial Context of the District²⁵

The ZF Mgcawu District Municipality (ZFMDM) consists of six Local Municipalities namely, Dawid Kruiper; Kai !Garib; //Khara Hais; Tsantsabane, !Kheis and Kgatelopele, and covers an area of more than 100 000 km² (almost 30% of the Northern Cape Province). Of this total, 65% (65 000 km²) is made up of the Kalahari Desert, Kgalagadi Transfrontier Park and the former Bushman Land. The largest town in the region is Upington, which also functions as the district municipal capital. Following the municipal elections in 2011, Riemvasmaak (Sending and Vredesvallei) were included within the KGLM. The Riemvasmaak Community is located ~ 60 km west of Kakamas. Based on the Household Community Survey data the population of the ZFMDM was 252 692 in 2016 compared to 236 763 in 2011. The DLKM and KGLM are home to ~ 70 % of the ZFMDM population (Table 3.1).

Table 19: Population of Local Municipalities within the ZFMDM

| Local Municipality | Population | Percentage |
|--------------------|------------|------------|
| Dawid Kruiper | 107 161 | 42.4% |
| Kai !Garib | 68 929 | 27.3% |
| Tsantsabane | 39 345 | 15.6% |

²⁵ ZF Mccawu District Municipality

| | | |
|-------------|--------|------|
| !Kheis | 16 566 | 7.5% |
| Kgatelopele | 20 691 | 8.2% |

The Coloured population group make up the dominant group in the ZFMDM, DKLM and KGLM, followed by Black Africans and Whites. In terms of language, Afrikaans, followed by Setswana and IsiXhosa are the three main languages spoken in the area.

The ZFMDM accounts for ~ 30% of the Northern Cape economy. Agriculture plays a key role in the local economy and is strongly linked to irrigation along the Gariep River (Orange River). The Orange River is perennial with a flow which varies between 50 and 1800 cubic meter per second (cum/s) depending on the season. The flow of the river is largely controlled by the releases of the dams upstream, like the Bloemhof, Gariep and Van der Kloof dams. Agriculture in the ZFMDM is dominated by grape production for table grapes, which is mainly exported to Europe, as well as livestock and game farming.

The Orange River over area delivers a major part is that South Africa's table grape production. More than 90% of Africa's total dried vine fruit production is produced in the Northern Cape. The Orange River Wine Cellars Co-op, based in Upington, is the second largest winemaking cooperative in the world and has wine cellars in Groblershoop, Grootdrink, Upington, Keimoes and Kakamas.

Livestock farming occurs mainly on large farms where farming is extensive. The majority of the farms are privately owned. The central parts of the region consist mainly of semi-desert areas and are therefore, with a few exceptions, mainly suitable for extensive livestock farming. In terms of employment, the most important economic sectors are Agriculture, followed by Community, Social and Personal, and Private Households.

Tourism represents one of the most important economic sectors in the Northern Cape as well as within the ZFMDM. In this regard the ZFMDM IDP indicates that tourism is the fastest growing component of the economy. Key tourism assets include the world renowned Kgalagadi Transfrontier Park, Au-grabies National Park and Pitskop Nature Reserve near Upington.

Minerals and mining also play an important role in the local economy of the ZFMDM. Key mining activities include copper and zinc of Areachap north of Upington. Various small concentrations of calcite, lead, fluorspar, barite, wolfram and amethyst. Salt is also being mined at two pans, namely Groot Witpan, 95 km northwest of Upington and at Witpan, 115km northwest of Upington. In terms of social well-being the ZFMDM's greatest social challenges are illiteracy, poverty and low education levels.

5.6.3 Spatial context of the Local Munigipality²⁶

The proposed facility is located in the KGLM, a category-B municipality²⁷. The municipality is approximately 7 445 km² in size (~7.2% of the ZFMDM) and is bordered to the north, south and west by a District Management Area (NCDMA08) and in the east by the //Khara Hais and !Kheis Local Municipalities. In terms of land use, the Kai !Garib Local Municipality is largely rural and agricultural with three urban/semi-urban nodes at Kakamas, the designated administrative centre of the municipality, Keimoes and Kenhardt.

The Orange River (Gariep River) plays a key role in the day to day life of most of the inhabitants in the KGLM and is critical to the area's economic well-being. The main towns of Kakamas and Keimoes are situated in the midst of an intensive irrigation farming community stretching from Groblershoop in the east up to Blouputs in the west. Farming includes crops such as vineyards, pecan nut- and citrus

²⁶ Kai !Garib

²⁷ A category-B municipality is defined as a municipality that shares executive and legislative authority in its area with a category- C municipality within whose area it falls.

plantations. Local areas within the KGLM where intensive irrigation is undertaken include Blouputs, Eksteenskuil, Riemvasmaak and Cannon Island.

The KGLM also has two unique trust communities that in many ways functions differently than other communities. The first is Riemvasmaak which is located ~ 60 km west from Kakamas and falls with Ward 1 of the municipality. The Riemvasmaak community consists of ~ 250 households and were forcefully removed from their land in 1973 and returned in 1994. The Riemvasmaak Community Trust is divided in two sections namely Vredesvallei and Mission.

Of relevance to the proposed development is the second Trust community, the Blocuso Trust Community, which consists of 3 farms, namely, Bloemsmond, Curriescamp and Soverby. These farms are located in Ward 8, ~ 10 km north east of Keimoes. The community of Bloemsmond is located immediately to the south of the site. The farms were handed over to the three families by Queen Victoria in 1886. However, the properties were forcefully resold to white farmers in 1914 and the previous owners became farm workers. The Independent church of Gordonia under the leadership of Ds Saul Damon bought back the farms between 1914 and 1934. In 2000 the government assisted the 466 families on the three farms to buy the farms from the church. The communities established the Blocuso Trust and used the government subsidies to buy the farms and provide basic services like electricity and clean water. Since the Blocuso Trust was established the government have provided the trust with great assistance in terms of infrastructure projects.

The Municipal Area is divided into 9 wards (Table 3.2). The proposed SEF is located in Ward 8.

Table 20: List of Wards in the KGLM

| Ward | Areas |
|------|---|
| 1 | Augrabies, Noudonsies, Zeekoeisteek, Blouput Riemvasmaak |
| 2 | Cillie, Marchand, Perde-eiland, Omdraai |
| 3 | Kakamas Dorp, Alheit, Bloukamp, Truterkamp |
| 4 | Kromhout Boerdery, Kakamas Oos (Langverwag), Neus |
| 5 | Lennertsville, Koms, Keimoes Dorp, Akasia Park |
| 6 | Gardenia, Whalsig, Noodkamp, Vaaldriehoek |
| 7 | Lutzburg, Friersdale, Warmsand, Eenduin, Swartbooisberg, Bloemsmond, |
| 8 | Eksteenskuil Eilande, Soverby, McTaggerscamp, Curriescamp, Blaauwsekop, Kanoneiland |
| 9 | Kenhardt, Southern Farms |

6. IMPACT ASSESSMENT

This section of the report was completed with input from the following specialists:

- Terrestrial Ecology (Enviro Insight & Confluent Environmental, 2019)
- Avifauna (Enviro Insight & Confluent Environmental, 2019)
- Botany (Enviro Insight & Confluent Environmental, 2019)
- Freshwater Ecology (Confluent Environmental, 2019)
- Agricultural (Lubbe, 2019)
- Palaeontology (Almond, 2019)
- Archaeology and Heritage (HCAC, 2019)
- Visual (Stead, 2019)
- Socio Economic (Barbour, 2018)

The impacts will firstly be discussed per specialist discipline and then summarised in the impact summary and statement below²⁸.

6.1 ASSESSMENT METHODOLOGY

²⁸ The assessment tables reflected in this section are those of the preferred site alternative. Please see the discussion in section 2.4 above for impacts associated with alternatives.

All possible impacts need to be assessed – the **direct, in-direct as well as cumulative impacts**. Impact criteria should include the following:

- **Nature of the impact:** impacts associated with the proposed Bloemsmond 4 have been described in terms of whether they are negative or positive and to what extent.
- **Duration of impacts: Impact were assessed in terms of their anticipated duration:**
 - Short term (e.g. during the construction phase)
 - Medium term (e.g. during part or all of the operational phase)
 - Permanent (e.g. where the impact is for all intents and purposes irreversible)
 - Discontinuous or intermittent (e.g. where the impact may only occur during specific climatic conditions or during a particular season of the year)
- **Intensity or magnitude: The size of the impact (if positive) or its severity (if negative):**
 - Low, where the receiving environment (biophysical, social, economic, cultural etc) is negligibly affected or where the impact is so low that the remedial action is not required;
 - Medium, where the receiving environment (biophysical, social, economic, cultural etc) is altered, but not severely affected, and the impact can be remedied successfully; and
 - High, where the receiving environment (biophysical, social, economic, cultural etc) would be substantially (i.e. to a very large degree) affected. If a negative impact, could lead to irreplaceable loss of a resource and/or unacceptable consequences for human wellbeing.
- **Probability: Should describe the likelihood of the impact actually occurring indicated as:**
 - Improbable, where the possibility of the impact is very low either because of design or historic experience;
 - Probable, where there is a distinct possibility that the impact will occur;
 - Highly probable, where it is most likely that the impact will occur; or
 - Definite, where the impact will occur regardless of any prevention measures.
- **Significance: The significance of impacts can be determined through a synthesis of the assessment criteria. Significance can be described as:**
 - Low, where it would have negligible effect on the receiving environment (biophysical, social, economic, cultural etc), and on the decision;
 - Medium, where it would have a moderate effect on the receiving environment (biophysical, social, economic, cultural etc), and should influence the decision;
 - High, where it would have, or there would be a high risk of, a large effect on the receiving environment (biophysical, social, economic, cultural etc). These impacts should have a major influence on the decision;
 - Very high, where it would have, or there would be a high risk of, an irreversible negative impact on the receiving environment (biophysical, social, economic, cultural etc) and irreplaceable loss of natural capital/resources or a major positive effect on human well-being. Impacts of very high significance should be a central factor in decision-making.
 - Provision should be made for with and without mitigation scenarios.

- **Confidence: The level of confidence in predicting the impact can be described as:**
 - Low, where there is little confidence in the prediction, due to inherent uncertainty about the likely response of the receiving ecosystem, or inadequate information;
 - Medium, where there is a moderate level of confidence in the prediction, or
 - High, where the impact can be predicted with a high level of confidence
- **Consequence: What will happen if the impact occurs**
 - Insignificant, where the potential consequence of an identified impact will not cause detrimental impact to the receiving environment;
 - Significant, where the potential consequence of an identified impact will cause detrimental impact to the receiving environment.
 - Provision must be made for with and without mitigation scenarios.

The impacts should also be assessed in terms of the following aspects:

- **Status of the impact**

The specialist should determine whether the impacts are negative, positive or neutral (“cost – benefit” analysis). The impacts are to be assessed in terms of their effect on the project and the environment. For example, an impact that is positive for the proposed development may be negative for the environment. It is important that this distinction is made in the analysis.

- **Cumulative impact**

Consideration must be given to the extent of any accumulative impact that may occur due to the proposed development. Such impacts must be evaluated with an assessment of similar developments planned and already in the environment. Such impacts will be either positive or negative, and will be graded as being of negligible, low, medium or high impact.

Care must be taken to ensure that where cumulative impacts can occur that these impacts are considered and categorised as **additive** (incremental or accumulative); **interactive**, **sequential** or **synergistic**.

Based on a synthesis of the information contained in the above-described procedure, the specialists assessed the potential impacts in terms of the following significance criteria:

- **No significance:** The impacts do not influence the proposed development and/or environment in any way.
- **Low significance:** The impacts will have a minor influence on the proposed development and/or environment. These impacts require some attention to modification of the project design where possible, or alternative mitigation.
- **Moderate significance:** The impacts will have a moderate influence on the proposed development and/or environment. The impact can be ameliorated by a modification in the project design or implementation of effective mitigation measures.
- **High significance:** The impacts will have a major influence on the proposed development and/or environment.

6.2 IDENTIFICATION OF IMPACTS ASSESSED

The potential key impacts identified and assessed by the various specialists (more details on the significance and ratings of these impacts are provided in section 6.4 – 6.11 below and in the attached specialist reports).

6.2.1 Ecological Impacts Assessed

Construction Phase

- Vegetation clearing for construction could impact indigenous species as well as riparian and terrestrial plant communities. Vegetation clearing will also lead to **habitat loss** for fauna and potentially the loss of sensitive faunal species, habitats and ecosystems within the remaining natural areas.
- Presence and operation of construction machinery on site. This will create a physical impact as well as generate noise, pollution and other forms of disturbance at the site. Disturbance could affect faunal species.
- Increased human presence can lead to faunal conflict.

Operational Phase

- The presence of the development could disrupt the connectivity of the landscape.
- Human-animal conflict can occur.
- Alien clearing will improve the ecology and habitat of the area.

Cumulative Impacts

- Transformation of intact habitat could disrupt the connectivity of the landscape for fauna and flora and impair their ability to respond to environmental fluctuations.

6.2.2 Freshwater Impacts Assessed

- Disturbance to riparian habitat;
- Disturbance to watercourse bed and banks;
- Sedimentation of downstream watercourses;
- Water Quality Impacts; and
- Alien plant introduction

6.2.3 Heritage Impacts Assessed

Construction Phase

- Impact on scenic routes during construction

Operational Phase

- Impacts on the heritage resources.
- Impact on scenic routes.
- Impact of new structures on cultural landscape and character.

Cumulative impacts

- Change to the rural character.
- Socio-economic upliftment.

6.2.4 Archaeological Impacts Assessed

Construction Phase

- Disturbance to surface and sub-surface sediments

Operational Phase

- None

Cumulative Impacts

- No cumulative impacts will arise

6.2.5 Visual Impacts Assessed

Construction Phase

- Visual scarring as a result of new development, clearing vegetation and construction works.

Operational Phase

- Change in the rural visual character of the site.
- Visual impact on key visual receptors and secondary visual receptors.
- Potential visual.
- Visibility from sensitive receptors.
- Visual intrusion of lighting at night.

6.2.6 Socio-Economic Impacts Assessed

Construction Phase

- Creation of business and employment opportunities
- Impacts associated with the presence of construction workers on site;
- Security and safety impacts associated with the presence of construction workers;
- Noise, dust and safety impacts associated with construction related activities and the movement of heavy vehicles.

Operational Phase

- Creation of employment and business opportunities;
- Impact on rural sense of place and character of the area;
- Crime levels and pressure on local services.

6.3 SITE CONSTRAINTS AND POTENTIAL RISKS & IMPACTS

The following spatial site-specific constraints were identified by various specialists and the EAP during the initial stage of the environmental process.

Table 21: Summary of potential site constraints identified during the initial phase of the BAR Process and which are assessed in the section below.

| Specialist Discipline | Site Constraints |
|-----------------------|--|
| Flora: | Sensitive vegetation associated with the koppies, water courses and pans. |
| Fauna | Sensitive habitat associated with the koppies, water courses and pans. |
| Avifauna | Habitat and Avifaunal Flight paths associated with the koppies |
| Agricultural | No specific spatial constraints identified. |
| Heritage | <ul style="list-style-type: none"> - Stone Cairn - 2 x Open-air Stone Age site dating to the Middle Stone Age and Late Stone Age |
| Visual | Scenic Receptors (water courses and Koppies) |

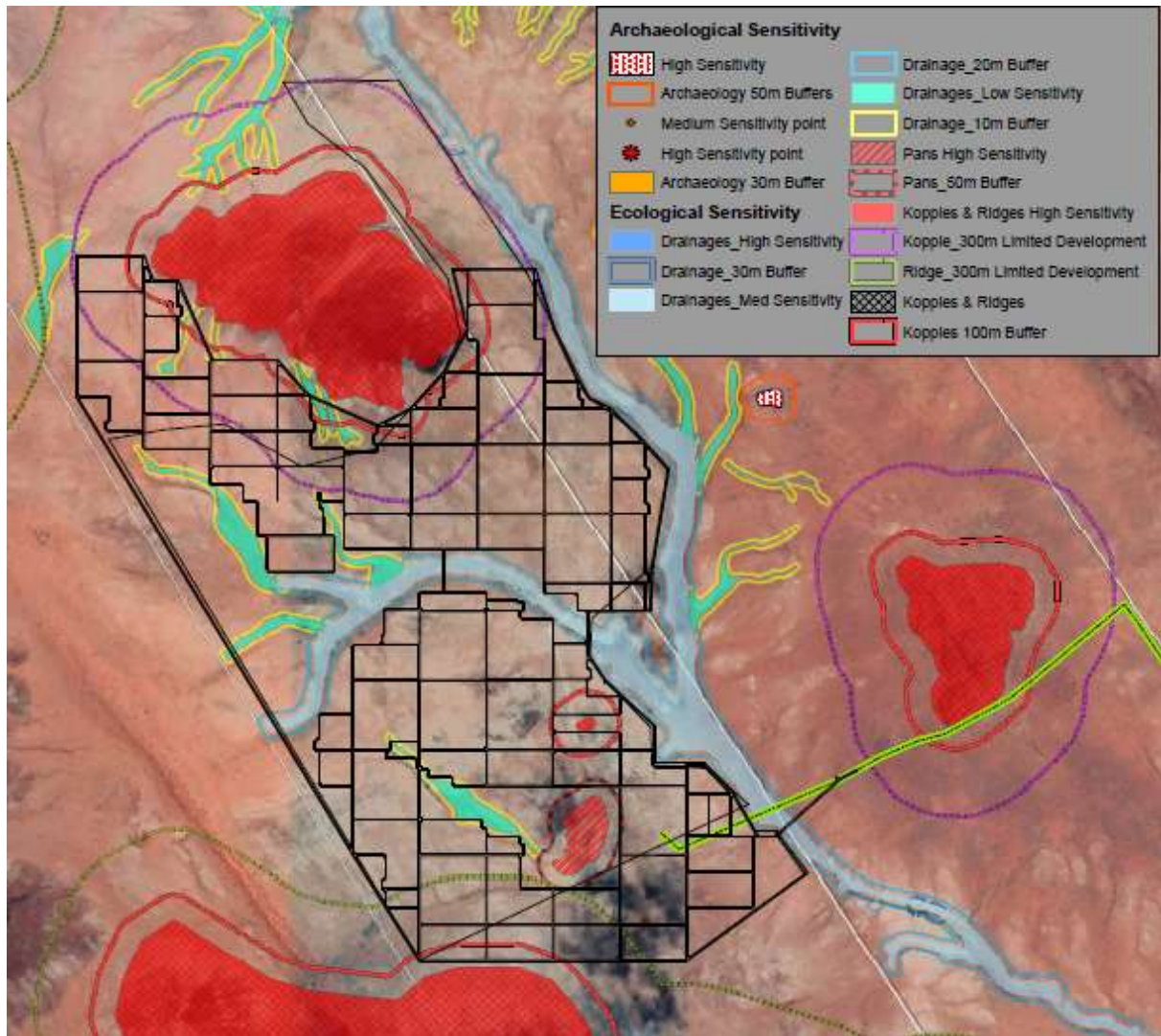


Figure 24: Showing sensitive features and buffer areas identified within and in proximity to the Bloemsmond 4 study area. These include low, medium and high sensitivity features. Please refer to Appendix B for a detailed sensitivity map.

Kindly refer to section 2.10 above for details as to how the preferred alternative incorporated these sensitive features.

All high and medium sensitive features were avoided and excluded from the layout,. Impacts on the low and low-medium sensitivity features were mitigated (See section 7 for detailed mitigation measures).

6.4 TERRESTRIAL FAUNA IMPACTS

An Ecological Assessment (encompassing Terrestrial Fauna, Avifauna and Botany) was undertaken by Enviro Insight in conjunction with Confluent Environmental. A copy of this assessment is attached in **Annexure E1** from which the following is drawn.

The specialist identified the following potential impacts on fauna, which are assessed in detail in the tables below:

- Loss and/or displacement of critically endangered/endangered animal species;
- Impact on natural communities of particular scientific, conservation or education value;
- Decrease in diversity of natural animal communities;
- Decrease in availability and reliability of food sources for animal communities;

- Possibility to introduce and/or enhance the spread of alien animal species;
- Threat to the ecological functioning of natural terrestrial communities due to:
 - Isolation of animal communities by destruction of habitat; and
 - Physical destruction of the habitat.
- Construction of barriers to animal movement or migration.

Table 22: Pre Mitigation Impact of Bloemsmond 4 on Terrestrial Fauna.

| Impact | Impacts Status | Spatial scale | Temporal scale | Probability | Severity | Significance value | Significance rating |
|---|----------------|---------------|----------------|-------------|----------|--------------------|---------------------|
| Loss of existing habitat due to loss of vegetation | | | | | | | |
| Slashing of vegetation | Negative | 1 | 3 | 5 | 3 | 15 | High |
| Rammed in H beams | Negative | 1 | 4 | 5 | 4 | 20 | High |
| Site camps and laydown areas | Negative | 1 | 4 | 5 | 3 | 15 | High |
| Direct loss of flora species of conservation concern and flora species endemic to the region | Negative | 1 | 4 | 4 | 4 | 16 | High |
| Stochastic events such as fire | Negative | 4 | 3 | 4 | 4 | 16 | High |
| Direct mortality of fauna | | | | | | | |
| Staff or construction workers poaching and hunting | Negative | 1 | 2 | 4 | 3 | 12 | Medium/High |
| Collisions with vehicles | Negative | 1 | 4 | 4 | 4 | 16 | High |
| Intentional killing of fauna | Negative | 1 | 4 | 4 | 3 | 12 | Medium/High |
| Loss of species of conservation concern | Negative | 2 | 4 | 4 | 4 | 16 | High |
| Vegetation clearing/ construction preparation | Negative | 1 | 2 | 4 | 3 | 12 | Medium/High |
| Disruption/alteration of ecological life cycles (breeding, migration, feeding) due to noise, dust and lighting | | | | | | | |
| Access roads and construction works | Negative | 2 | 4 | 4 | 3 | 12 | Medium/High |
| Solar panels (operational) | Negative | 2 | 5 | 5 | 4 | 20 | High |
| Introduction of alien flora affecting native floral and faunal assemblages | | | | | | | |
| Vehicles and machinery | Negative | 3 | 4 | 4 | 4 | 16 | High |
| Soil Disturbance | Negative | 2 | 3 | 4 | 4 | 16 | High |
| Increase in erosion reduces habitat quality | | | | | | | |
| Vegetation clearing | Negative | 1 | 3 | 3 | 3 | 9 | Medium |
| Roads and hardened surfaces | Negative | 1 | 4 | 4 | 3 | 12 | Medium/High |

Table 23: Post - Mitigation Impact of Bloemsmond 4 on Terrestrial Fauna.

| Impact | Impacts Status | Spatial scale | Temporal scale | Probability | Severity | Significance value | Significance rating |
|--|----------------|---------------|----------------|-------------|----------|--------------------|---------------------|
| Loss of existing habitat due to loss of vegetation | | | | | | | |
| Slashing of vegetation | Negative | 1 | 3 | 3 | 3 | 9 | Medium |
| Rammed in H beams | Negative | 1 | 4 | 3 | 3 | 9 | Medium |
| Site camps and laydown areas | Negative | 1 | 4 | 3 | 2 | 6 | Medium |
| Direct loss of flora species of conservation concern and flora species endemic to the region | Negative | 1 | 4 | 3 | 2 | 6 | Medium |
| Stochastic events such as fire | Negative | 4 | 3 | 2 | 2 | 4 | Low/Medium |
| Direct mortality of fauna | | | | | | | |
| Staff or construction workers poaching and hunting | Negative | 1 | 2 | 1 | 2 | 2 | Low |

| Impact | Impacts Status | Spatial scale | Temporal scale | Probability | Severity | Significance value | Significance rating |
|---|----------------|---------------|----------------|-------------|----------|--------------------|---------------------|
| Collisions with vehicles | Negative | 1 | 4 | 2 | 2 | 4 | Low/Medium |
| Intentional killing of fauna | Negative | 1 | 4 | 1 | 2 | 2 | Low |
| Loss of species of conservation concern | Negative | 2 | 4 | 3 | 3 | 9 | Medium |
| Vegetation clearing/ construction preparation | Negative | 1 | 2 | 2 | 2 | 4 | Low/Medium |
| Disruption/alteration of ecological life cycles (breeding, migration, feeding) due to noise, dust and lighting | | | | | | | |
| Access roads and construction works | Negative | 1 | 1 | 2 | 2 | 4 | Low/Medium |
| Solar panels (operational) | Negative | 1 | 1 | 2 | 2 | 4 | Low/Medium |
| Introduction of alien flora affecting native faunal assemblages | | | | | | | |
| Vehicles and machinery | Negative | 2 | 4 | 3 | 2 | 6 | Medium |
| Soil disturbance | Negative | 2 | 3 | 2 | 2 | 4 | Low/Medium |
| Increase in erosion reduces habitat quality | | | | | | | |
| Vegetation clearing | Negative | 1 | 3 | 2 | 2 | 4 | Low/Medium |
| Roads and hardened surfaces | Negative | 1 | 4 | 3 | 2 | 6 | Medium |

As can be seen from the table above, the significance of all impacts on Terrestrial Fauna can be mitigated to Medium or Low.

6.4.1 Cumulative Impacts on Fauna

There is a large number of solar developments within the area, which raises the possibility of significant cumulative impacts. As the proposed development occurs in a Renewable Energy Development Zone (REDZ), the large number of renewable energy projects, especially solar facilities, is expected within the region. This includes several approved, preferred-bidder PV projects immediately adjacent to the site on Dyason's Klip and the Abengoa Khi Solar One CSP facility north-east of the site, as well as several mixed CSP/PV developments north of Dyason's Klip. Bloemsmond 4 would contribute about 268 of the total 1184ha transformed area for target property. This equates to around 28.2% of the total transformed area for the Bloemsmond land parcels.

The most significant cumulative impacts on terrestrial fauna would be:

- Vegetation and habitat loss
- Increased habitat fragmentation
- Reduced landscape connectivity for fauna species
- Loss of critical habitat for SCC
- Loss of provincially protected species and nationally protected tree species
- Loss of avifauna species due to incineration, electrocution and collision with infrastructure
- Surface water impacts
- Increased erosion
- Loss of vegetation cover will cause increased dust pollution
- Increased alien flora and fauna species

The development would contribute to cumulative impacts in the area, which are becoming increasingly large due to the concentration of renewable energy facilities in the immediate area.

The current project would contribute about 268ha of transformation to the area. This equates to around 5% of the affected property and the individual contribution to the loss of either Kalahari Karroid Shrubland or Bushmanland Arid Grassland is insignificant. At a broader level, these vegetation types were considered to be around 99% intact in 2006 (Mucina & Rutherford 2006) and the additional contribution towards transformation due to all approved renewable energy development amounts to an additional amount of less than 1% of either vegetation type.

The concentration of development within the area will however increase the fragmentation of the landscape and impact landscape connectivity. As the Orange River is an important landscape feature, movement to and from the river towards the west is especially vulnerable to impact and is clearly going to become increasingly constrained. Although there may be some local disruption of landscape connectivity, levels of transformation in the area have not yet reached the levels that suggest that significant impacts will start to occur on broader ecological processes and the long-term ability of fauna and flora to respond to environmental change.

6.4.2 Concluding Statement – Terrestrial Faunal Impact

Several important ridges and rocky outcrops occur within the surrounding area which are highly sensitive and should be avoided by the proposed development as they act as important habitat for foraging and breeding fauna. These species are highly dependent on ridges and rocky outcrops for their survival and a 100m “no-go” area has been suggested for their protection. This entails that no development should occur within 100m from the identified ridges and rocky outcrops, and a further 200m buffer has been suggested where activities should be limited. The preferred layout alternative for Bloemsmond 4 takes these sensitive features and buffers into account.

The Ecological specialist raised concerns relating to the Level of assessment of cumulative impacts across the PV industry as a whole. Cape EAPrac is however of the opinion that the negative mapping exercise that was already undertaken for the Strategic Environmental Assessment for the REDZ (CSIR, 2015) has to a large extent considered cumulative impact on a National Scale and spatially defined areas where large scale cumulative impact would not result in significant irreversible impacts.

The ecology specialist nevertheless concluded that the project can be approved subject to alternative layouts prepared taking into consideration buffer areas

6.5 AVIFAUNAL IMPACTS

An Ecological Assessment (encompassing Terrestrial Fauna, Avifauna and Botany) was undertaken by Enviro Insight in conjunction with Confluent Environmental. A copy of this assessment is attached in **Annexure E1** from which the following is drawn.

The Specialist, firstly undertook a desktop study in which bird species that could potentially occur in the vicinity of the study area were identified using data from the second South African Bird Atlas Project (SABAP2). The species list produced by the specialist is based on an area much larger than the actual study area. This approach was adopted to ensure that all species potentially occurring within the study area, whether resident, nomadic, or migratory, are identified.

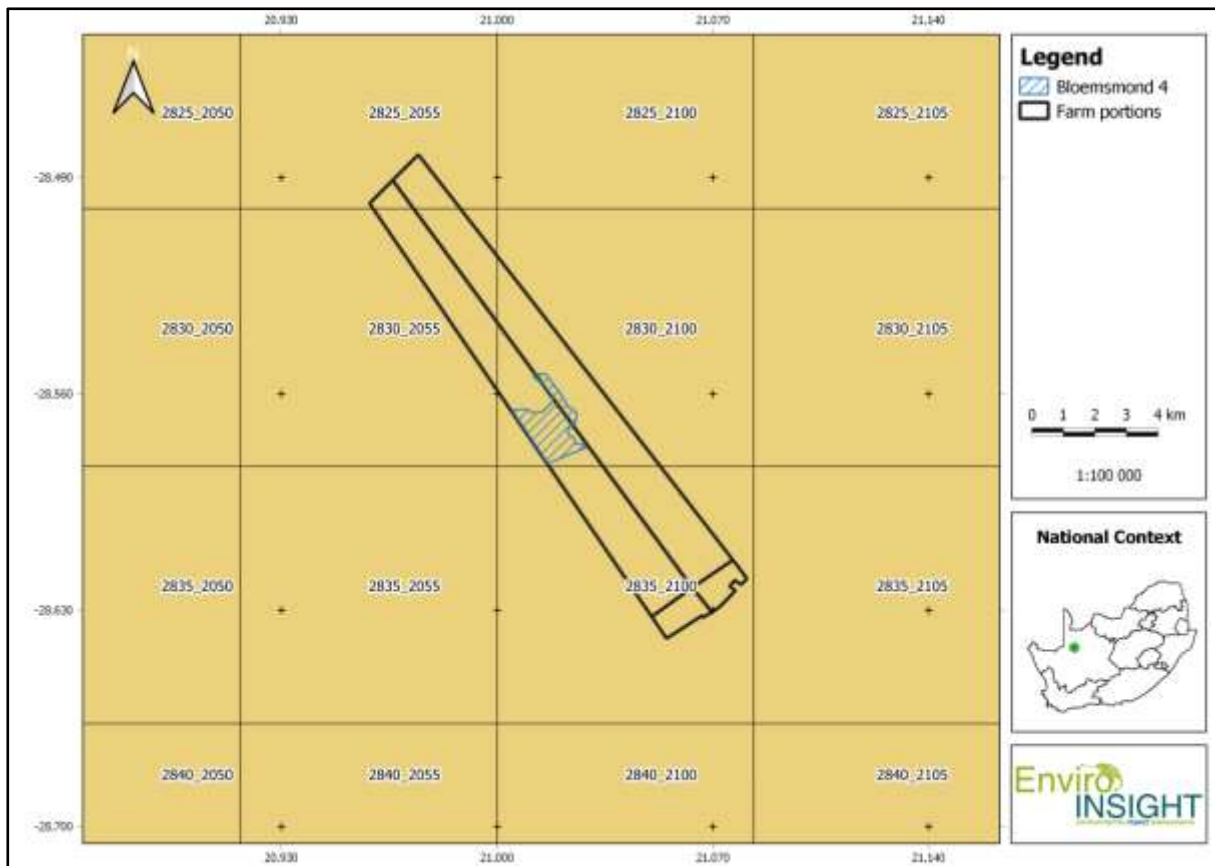


Figure 25: The study area in relation to the SABAP2 pentads.

As with the terrestrial fauna, the following potential impacts on Avifauna were identified (it must be noted that many of the impacts identified and assessed in respect of terrestrial fauna are also applicable to avifauna).

- Loss and/or displacement of critically endangered/endangered animal species;
- Impact on natural communities of particular scientific, conservation or education value;
- Impact on natural movement of species (flight pathways etc.);
- Disturbance of non-resident or migrant species (birds over-wintering, breeding);
- Decrease in diversity of natural animal communities;
- Decrease in availability and reliability of food sources for avifaunal communities;
- Threat to the ecological functioning of natural terrestrial communities due to:
 - Isolation of animal communities by destruction of habitat; and
 - Physical destruction of the habitat.
- Construction of barriers to animal movement or migration.

6.6 AGRICULTURAL IMPACTS

Mr Christo Lubbe undertook a specialist assessment of the potential impacts of Bloemsmond 4 on the agricultural environment. A copy of this assessment is attached in **Annexure E3**.

The agricultural specialist identified the following potential impacts associated with the Bloemsmond 4:

- Loss of agricultural land
- Erosion and change of drainage patterns
- Pollution

An assessment of these impacts for the various phases of the development are included below.

6.6.1 Agricultural Impacts during construction

The agricultural impacts during the construction phase of Bloemsmond 4 are assessed in the table below:

Table 24: Assessment of agricultural Impacts during the construction of Bloemsmond 4.

| Nature: Soil pollution with contaminants during the construction phase may take place, including spillages of hydrocarbon (fuel oil) and cement. This is possible during the construction of all facets of the facility: laydown area, concrete foundations of the auxiliary buildings, inverter stations subterranean cabling, main access and internal service roads. | | |
|--|---|------------------------|
| | Without mitigation | With mitigation |
| Extent | Local | Local |
| Duration | Medium Term | Very short |
| Magnitude | Low | Minor |
| Probability | Probable | Probable |
| Significance | Low | Low |
| Status (Positive or negative) | Negative | Negative |
| Reversibility | Partly reversible | Fully reversible |
| Irreplaceable loss of Resources | Yes | Yes |
| Can impacts be mitigated? | Yes | Yes |
| Mitigation: | See section 7 of this BAR for a summary of mitigation measures. | |
| Cumulative impacts: | No, site-bound | |
| Residual Risks: | Yes, it is impossible to clear the affected area completely. | |
| Nature: The establishment of the PV solar facility will be done at the expense of agricultural land. The area to be lost for agricultural development would be 268ha in size. This includes the area under PV panels, internal service roads and temporary laydown area. | | |
| | Without mitigation | With mitigation |
| Extent | Local – Regional | Local |
| Duration | Long-term | Long-term |
| Magnitude | Moderate | Low |
| Probability | Probable | Improbable |
| Significance | Medium | Low |
| Status (Positive or negative) | Negative | Negative |
| Reversibility | Low | Low |
| Irreplaceable loss of Resources? | No | No |
| Can impacts be mitigated? | Yes | Yes |
| Mitigation: | See section 7 of this BAR for a summary of mitigation measures. | |
| Cumulative impacts: | Impact is low due to agricultural potential of the locally. With increasingly adding of facilities, the impact will become more of significance if not mitigated. | |
| Residual Risks: | No, after decommissioning this impact will be reversed when rehabilitation has been completed. | |
| Nature: The construction of a PV solar facility will cause impairment of the land capability with the potential risk of erosion | | |
| | Without mitigation | With mitigation |
| Extent | Local | Local |
| Duration | Short term | Short term |
| Magnitude | Low | Low |
| Probability | Probable | Probable |
| Significance | Medium | Low |
| Status (positive or negative) | Negative | Negative |
| Reversibility | Low | Low |
| Irreplaceable loss of resources? | Yes | Yes |
| Can impacts be mitigated? | Yes | Yes |
| Mitigation: | See section 7 of this BAR for a summary of mitigation measures. | |
| Cumulative impacts: | No cumulative impacts are expected to occur, as all impacts will be site bounded. | |
| Residual Risks: | No. Effected areas will be rehabilitated, as the impact will only be applicable during construction phase. | |

| Nature: The establishment of the PV solar facility may alter drainage patterns with construction and cause erosion | | |
|---|---|------------------------|
| | Without mitigation | With mitigation |
| Extent | Local | Local |
| Duration | Long term | Long term |
| Magnitude | Low | Low |
| Probability | Probable | Probable |
| Significance | Low | Low |
| Status (positive or negative) | Negative | Negative |
| Reversibility | Low | Low |
| Irreplaceable loss of resources? | Yes | Yes |
| Can impacts be mitigated? | Yes | Yes |
| Mitigation | See section 7 of this BAR for a summary of mitigation measures. | |
| Cumulative impacts: | No, all impacts will be site bounded. | |
| Residual Risks: | No. Effected areas will be rehabilitated when operation has ceased. | |

6.6.2 Agricultural Impacts during operation

The agricultural impacts during the operational phase of Bloemsmond 4 are assessed in the table below:

Table 25: Assessment of agricultural Impacts during the operation of Bloemsmond 4

| Nature: Soil pollution with contaminants during the operational phase may take place, including spillages of hydrocarbon (fuel oil) and cement. This is possible during the maintenance of the facility. | | |
|--|---|------------------------|
| | Without mitigation | With mitigation |
| Extent | Local | Local |
| Duration | Long Term | Long Term |
| Magnitude | Low | Minor |
| Probability | Probable | Probable |
| Significance | Low | Low |
| Status (Positive or negative) | Negative | Negative |
| Reversibility | Partly reversible | Fully reversible |
| Irreplaceable loss of Resources? | Yes | Yes |
| Can impacts be mitigated? | Yes | Yes |
| Mitigation: | See section 7 of this BAR for a summary of mitigation measures | |
| Cumulative impacts: | No, site-bound | |
| Residual Risks: | Yes, It is impossible to clear the affected area completely. | |
| Nature: The establishment of the PV solar facility will be done at the expense of agricultural land. Area to be lost for agricultural development would be 268 ha in size. This includes the area under PV panels, internal service roads and temporary laydown area. | | |
| | Without mitigation | With mitigation |
| Extent | Local – Regional | Local |
| Duration | Long-term | Long-term |
| Magnitude | Moderate | Low |
| Probability | Probable | improbable |
| Significance | Medium | Low |
| Status (Positive or negative) | Negative | Negative |
| Reversibility | Low | Low |
| Irreplaceable loss of Resources? | No | No |
| Can impacts be mitigated? | Yes | Yes |
| Mitigation: | See section 7 of this BAR for a summary of mitigation measures | |
| Cumulative impacts: | Impact is low due to agricultural potential of the locally. With increasingly adding of facilities, the impact will become more of significance if not mitigated. . | |
| Residual Risks: | No, after decommissioning this impact will be reversed when rehabilitation has been completed. | |

6.6.3 Agricultural Impacts during closure and decommissioning

The agricultural impacts during the closure and decommissioning phase of Bloemsmond 4 are assessed in the table below:

Table 26: Assessment of agricultural Impacts during the closure and decommissioning of Bloemsmond 4.

| | | |
|---|--|------------------------|
| Nature: Soil pollution with contaminants during the decommissioning phase may take place, including spillages of hydrocarbon (fuel oil) and cement. This is possible during the decommissioning of all facets of the facility: laydown area, demolished concrete foundations of the auxiliary buildings, inverter stations subterranean cabling, main access and internal service roads. | | |
| | Without mitigation | With mitigation |
| Extent | Local | Local |
| Duration | Medium Term | Very short |
| Magnitude | Low | Minor |
| Probability | Probable | Probable |
| Significance | Low | Low |
| Status (Positive or negative) | Negative | Negative |
| Reversibility | Partly reversible | Fully reversible |
| Irreplaceable loss of Resources? | Yes | Yes |
| Can impacts be mitigated? | Yes | Yes |
| Mitigation: | See section 7 of this BAR for a summary of mitigation measures | |
| Cumulative impacts: | No, site-bound | |
| Residual Risks: | Yes, It is impossible to clear the affected area completely | |

6.6.4 Cumulative agricultural impacts

To assess the cumulative impacts the specialist prepared an overview map showing the drainage, land capability and land cover is used to identify possible impacts that may accumulate on similar developments within a 30 km radius from this facility.

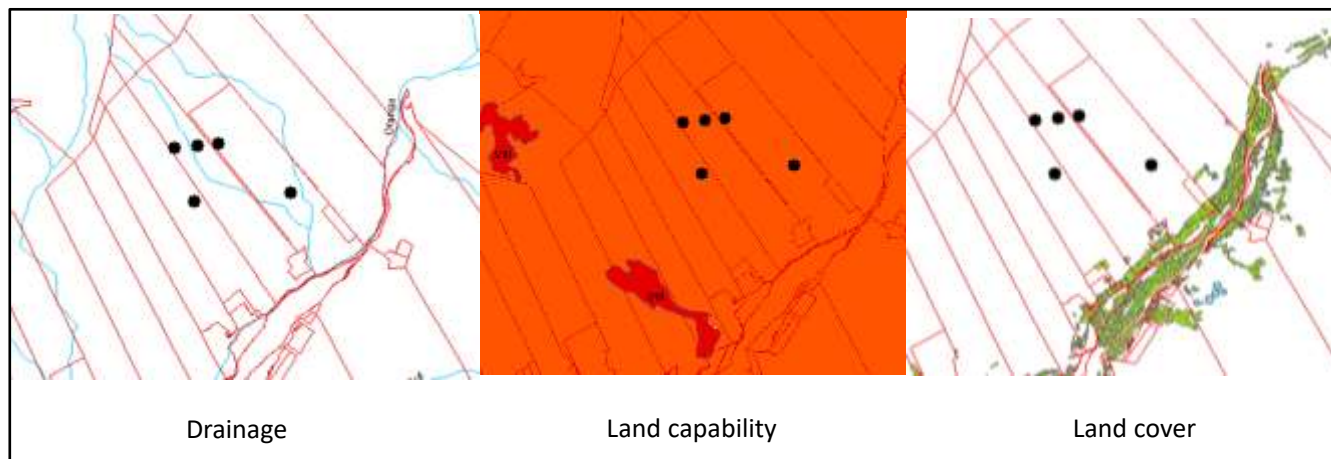


Figure 26: Solar developments in the vicinity of Bloemsmond 4 overlaid onto drainage, land capability and land cover maps.

The following cumulative impacts were identified by the agriculture specialist.

- Loss of agricultural land
- Altering drainage patterns
- Changing agricultural character to industrial

Table 27: Assessment of cumulative agricultural Impacts of Bloemsmond 4

| | | |
|--|---|--|
| Nature: The quantity of available soil for agricultural production decreases as result of the footprints of these facilities. The quality of soil decreases in the way the construction of these structures alters the workability of the soil. This includes the physical deformation in the soil profile. | | |
| | Overall impact of proposed project considered in isolation | Cumulative impact of the projects in the area |
| Extent | Local – Regional | Regional |
| Duration | Long Term | Long Term |
| Magnitude | Low | Moderate |
| Probability | Probable | Probable |
| Significance | Low | Medium |
| Status (Positive or negative) | Negative | Negative |
| Reversibility | Low | Low |
| Irreplaceable loss of Resources? | No | No |
| Can impacts be mitigated? | Yes | Yes |
| Mitigation: | See section 7 of this BAR for a summary of mitigation measures | |
| Nature: Clearing of vegetation increases flow speed and a lower infiltration tempo increases silt transport. | | |
| | Overall impact of proposed project considered in isolation | Cumulative impact of the projects in the area |
| Extent | Local | Regional |
| Duration | Long Term | Long Term |
| Magnitude | low | Low |
| Probability | Improbable | Probable |
| Significance | Low | Medium |
| Status (Positive or negative) | Negative | Negative |
| Reversibility | Low | Low |
| Irreplaceable loss of Resources? | No | No |
| Can impacts be mitigated? | Yes | Yes |
| Mitigation: | See section 7 of this BAR for a summary of mitigation measures | |
| Nature: Chemicals, hazardous substances and waste used or generated during live span of the facility accumulate and pollute soil will become contaminated | | |
| | Overall impact of proposed project considered in isolation | Cumulative impact of the projects in the area |
| Extent | Local | Regional(2) |
| Duration | Long Term (4) | Long Term (4) |
| Magnitude | low (4) | Low (4) |
| Probability | Improbable (2) | Probable (3) |
| Significance | Low (18) | Medium (30) |
| Status (Positive or negative) | Negative | Negative |
| Reversibility | Low | Low |
| Irreplaceable loss of Resources? | No | No |
| Can impacts be mitigated? | Yes | Yes |
| Mitigation: | See section 7 of this BAR for a summary of mitigation measures | |

6.6.5 Conclusion and recommendation of agricultural specialist

With reference to applicable sections of the Regulations for renewable energy in terms of Act 70 of 1970 and Act 43 of 1983, it can be stated that the proposed site will not suffer major agricultural impacts by the proposed development. The reasons include aspects such as soil potential, geology, climate, loss of cultivating land and stock farming and other possible impacts.

The site does not have high potential soil because of the low annual rainfall, high evaporation rate and extreme temperatures. Soils formed under these conditions have little movement of soluble nutrients and insoluble clay particles in the soil profile, restricting the adsorption of nutrients that would be available to plants. The soil is thus low in nutrient availability and has a low response to fertilizer input.

The land is currently used for game and livestock farming. The internal fencing is in the process of demolition, which indicates that farming with game would be the primary activity.

With a farm size of 4829.82 ha and carrying capacity of 32 ha per large stock unit (LSU), only 150 LSU can be carried on this farming unit. This is not considered to be an economically viable farming unit.

6.7 HERITAGE IMPACTS

A detailed Heritage impact Assessment was undertaken by HCAC. A copy of this assessment is attached in **Annexure E4** and is summarised below.

The impact on heritage sites by the proposed development is considered to be low. Impacts that may occur would be during the construction phase only and would be of very low significance. The features that will be impacted on as per the current layout include widespread stone age scatters of no heritage significance. The sites recorded will be avoided in the development.

Cumulative impacts occur from the combination of effects of various impacts on heritage resources. The importance of identifying and assessing cumulative impacts is that the whole is greater than the sum of its parts. The area is rich in terms of the number of archaeological features present. These features are of low significance and taking in consideration existing impacts by renewable energy developments the cumulative impact is still regarded as low. This and other projects in the area could, however, have an indirect impact on the larger heritage landscape.

6.7.1 Identification of Impacts

The following potential heritage impacts were identified by the specialist.

6.7.1.1 Pre-Construction phase:

It is assumed that the pre-construction phase involves the removal of topsoil and vegetation as well as the establishment of infrastructure needed for the construction phase. These activities can have a negative and irreversible impact on heritage sites. Impacts include destruction or partial destruction of non-renewable heritage resources.

6.7.1.2 Construction Phase

During this phase, the impacts and effects are similar in nature but more extensive than the pre-construction phase. These activities can have a negative and irreversible impact on heritage sites. Impacts include destruction or partial destruction of non-renewable heritage resources.

6.7.1.3 Operation Phase:

No impact is envisaged for the recorded heritage resources during this phase.

6.7.2 Assessment of Heritage Impacts.

The assessment of all heritage related impacts are included in the tables below, and the mitigation thereof is summarised in section 7 of the BAR.

Table 28. Assessment of impacts on Archaeological heritage resources.

| Nature: During the construction phase activities resulting in disturbance of surfaces and/or sub-surfaces may destroy, damage, alter, or remove from its original position archaeological material or objects. | | |
|---|---------------------------|---|
| | Without mitigation | With mitigation (Preservation/ excavation of site) |
| Extent | Site specific (1) | Site specific (1) |
| Duration | Permanent (5) | Permanent (5) |
| Magnitude | Low (2) | Low (2) |
| Probability | Improbable (2) | Improbable (2) |

| | | |
|---|--|-----------------|
| Significance | 16 (Low) | 16 (Low) |
| Status (positive or negative) | Negative | Negative |
| Reversibility | Not reversible | Not reversible |
| Irreplaceable loss of resources? | yes | Yes |
| Can impacts be mitigated? | Yes, a chance find procedure should be implemented. | Yes |
| Mitigation: | The archaeological sites identified (see sensitivity map in appendix b) will be avoided by the development with a buffer zone of 50 m for Site B3/1 and 30 m for the Stone Cairn (B3/2) and Stone Age site (B3/3). A Chance Find Procedure and Heritage Management plan should be implemented for the project. | |
| Residual Impacts: | If sites are destroyed this results in the depletion of archaeological record of the area and even though surface features can be avoided or mitigated, there is a chance that completely buried sites would still be impacted but this cannot be quantified. However, if sites are recorded and preserved or mitigated this adds to the record of the area. | |

From a cumulative perspective, it is anticipated that the development of Bloemsmond 4 will not result in a whole-scale change to the heritage character of the area as the development will not impact on any significant heritage resources and is in line with other developments in the area.

Table 29. Assessment of cumulative heritage impacts for Bloemsmond 4.

| | | |
|--|---|--|
| Nature: The development of the project and other renewable energy developments within the area may result in disturbance of surfaces and/or sub-surfaces and may destroy, damage, alter, or remove from its original position archaeological material or objects. | | |
| | Overall impact of the proposed project considered in isolation | Cumulative impact of the project and other projects in the area |
| Extent | Local (1) | Local (1) |
| Duration | Permanent (5) | Permanent (5) |
| Magnitude | Minor (2) | Minor (2) |
| Probability | Very Improbable (1) | Very Improbable (1) |
| Significance | 8 (Low) | 8 (Low) |
| Status (positive or negative) | Negative | Negative |
| Reversibility | Not reversible | Not reversible |
| Irreplaceable loss of resources? | No resources were recorded | No resources were recorded. |
| Can impacts be mitigated? | NA | NA |
| Confidence in findings | High | High |

6.7.3 Conclusion and recommendations of Heritage Specialist

HCAC was appointed to conduct a Heritage Impact Assessment of the proposed Bloemsmond 4 PV project to determine the impact of the proposed development on non-renewable resources. The study area of approximately 265 hectares was assessed both on desktop level and by a field survey. The lay out of the project was changed due to ecological reasons after the completion of the heritage survey and some areas were therefore not subjected to a field assessment. These areas are generally speaking of low archaeological significance but will have to be subjected to a walk through prior to development.

Next to drainage lines and where calcrete is exposed widespread occurrences of background scatter of mainly Middle and Later Stone Age flakes are found. A higher concentration of artefacts is found on a slightly elevated area in the centre of the development where dolerite boulders protrude through the calcrete. These artefacts are impacted on by sheet erosion, slowly washing downslope and are out of context. These features are scattered too sparsely to be of significance apart from noting them in this report.

A Prominent landscape feature referred to as Rooiberg occur outside and to the south east of the current study area and was a focal point for humans in antiquity (van der Walt 2015) and prominent archaeological sites are found here. Another archaeological site of interest located a couple of km's to the north east of the proposed PV facility is the recently discovered Kite like structures associated with

the LSA (van der Walt and Lombard 2018). No evidence of similar features was recorded in the study area.

Heritage Impact Assessments in the area (Gaigher 2013, Fourie 2014 and Van der Walt 2015, 2018) also recorded widespread scatters of Stone Age artefacts of low heritage significance referred to as background scatter (Orton 2016). According to Beaumont et al (1995) "thousands of square kilometres of Bushmanland are covered by this low-density lithic scatter". In an attempt to describe the background scatter within the area of investigation, artefacts located on the survey track path were recorded as find spots.

Sixteen Stone Age find spots were recorded during the study. No further mitigation is required for these find spots as they are scattered too sparsely to be of significance apart from noting their presence in this report. Four find spots were recorded with isolated artefacts possibly dating to the historical period, these consist of a metal can, a glass bottle that dates to around 1910 (Lastovica 1982), the top of a metal can with a partial inscription visible as well as a Martini Henry soft casing cartridge. These shells date to the late 1890's before the Boers started to use 7mm Mausers. These scattered, isolated features require no further mitigation.

If any graves are located in future they should ideally be preserved in-situ or alternatively relocated according to existing legislation.

According to the SAHRA paleontological sensitivity map the area is of moderate paleontological sensitivity and an independent study was conducted by John Almond (2019). The study recommended that pending the discovery of significant new fossils remains before or during construction, exemption from further specialist palaeontological studies and mitigation be granted for the proposed project.

The impact of the proposed project on heritage resources is considered low and it is recommended that the proposed project can commence based on the following recommendations as a condition of authorisation in the EMP:

The implementation of a chance finds procedure during the pre-construction and construction phase of the project.

The lay out of the project changed after the field survey and it is recommended that the areas that were not covered during the initial survey should be subjected to a heritage walk through prior to development.

The impact of the proposed project on heritage resources is considered to be of low significance. Therefore, the project is considered to be acceptable from a heritage perspective and no further pre-construction mitigation in terms of archaeological resources is required based on approval from SAHRA. Furthermore, the socio-economic benefits also outweigh the possible impacts of the development with the correct mitigation measures (i.e. chance find procedure) implemented for the project.

6.7.3.1 Chance Find Procedures

The possibility of the occurrence of subsurface finds cannot be excluded. Therefore, if during construction any possible finds such as stone tool scatters, artefacts or bone and fossil remains are made, the operations must be stopped and a qualified archaeologist must be contacted for an assessment of the find and therefore chance find procedures should be put in place as part of the EMP. A short summary of chance find procedures is discussed below.

This procedure applies to the developer's permanent employees, its subsidiaries, contractors and subcontractors, and service providers. The aim of this procedure is to establish monitoring and reporting procedures to ensure compliance with this policy and its associated procedures. Construction crews must be properly inducted to ensure they are fully aware of the procedures regarding chance finds as discussed below.

If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.

It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find, and confirm the extent of the work stoppage in that area.

The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA.

6.8 PALAEOLOGICAL IMPACTS

Dr John Almond from Natura Viva undertook a desktop paleontological assessment of the proposed Bloemsmond 4. A copy of this assessment is included in **Annexure E5**. The potential impacts on Palaeontological resources identified in the specialist study are summarised below.

The fossil heritage associated with all of the rock units represented within the Bloemsmond 4 study area has been previously outlined in previous desktop studies for the region to the southwest of Upington by Almond (2014a, 2014b, 2015).

The igneous and metamorphic basement rocks are entirely unfossiliferous. The fossil record of the Kalahari Group is generally sparse and low in diversity. The Gordonia Formation dune sands were mainly active during cold, drier intervals of the Pleistocene Epoch that were inimical to most forms of life, apart from hardy, desert-adapted species. Porous dune sands are not generally conducive to fossil preservation. However, mummification of soft tissues may play a role here and migrating lime-rich groundwaters derived from the underlying bedrocks (including, for example, dolerite) may lead to the rapid calcretisation of organic structures such as burrows and root casts. Occasional terrestrial fossil remains that might be expected within this unit include calcretized rhizoliths (root casts) and termitaria (e.g. *Hodotermes*, the harvester termite), ostrich egg shells (*Struthio*) and shells of land snails (e.g. *Trigonephrus*) (Almond 2008, Almond & Pether 2008). Other fossil groups such as freshwater bivalves and gastropods (e.g. *Corbula*, *Unio*) and snails, ostracods (seed shrimps), charophytes (stonewort algae), diatoms (microscopic algae within siliceous shells) and stromatolites (laminated microbial limestones) are associated with local watercourses and pans. Microfossils such as diatoms may be blown by wind into nearby dune sands. These Kalahari fossils (or subfossils) can be expected to occur sporadically but widely, and the overall palaeontological sensitivity of the Gordonia Formation is therefore considered to be low. Underlying calcretes of the Mokolanen Formation might also contain local concentrations of trace fossils such as rhizoliths, termite and other insect burrows, or even mammalian trackways, especially in areas associated with ancient wetlands.

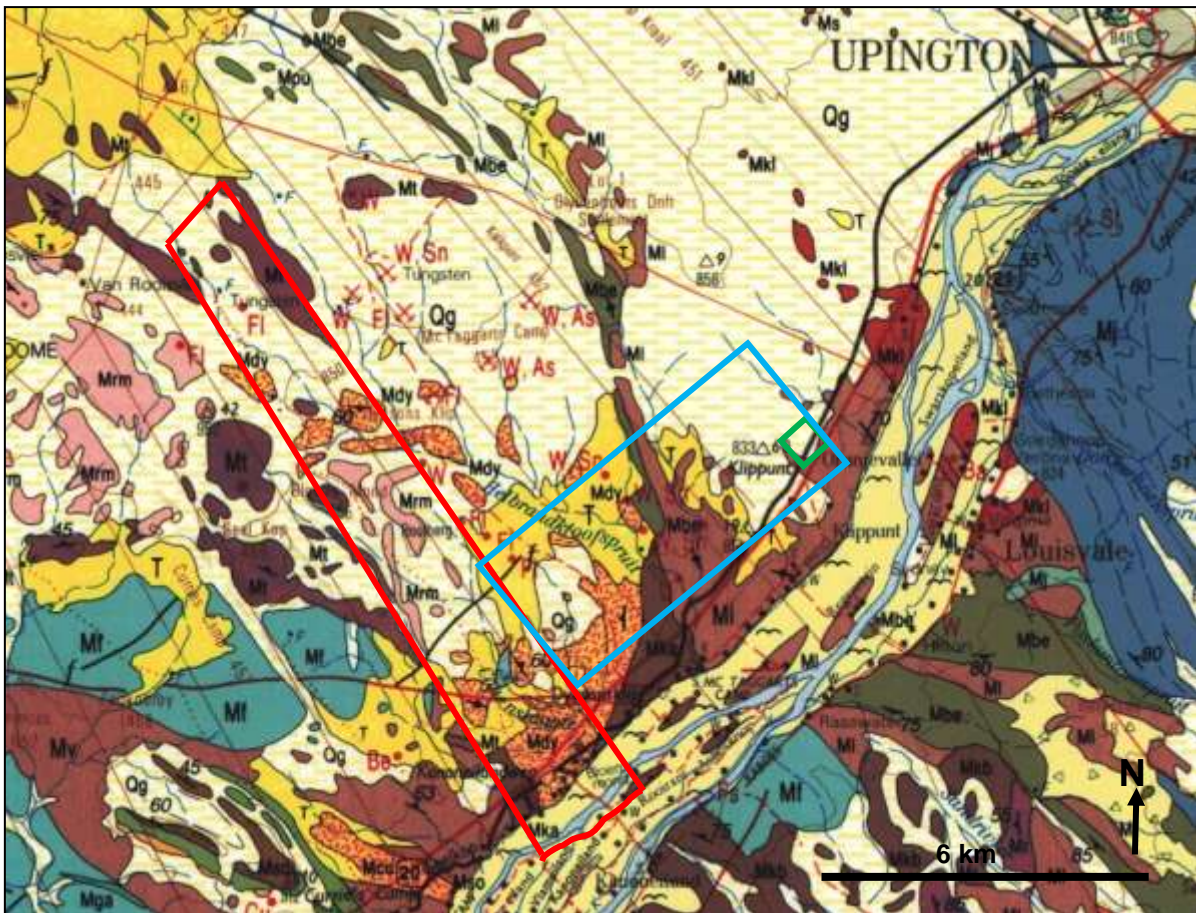


Figure 27: Extract from 1:250 000 geological map 2820 Upington (Council for Geoscience, Pretoria) showing the location of Farm Bloemsmond 455.

From this map it can be seen that the study area is underlain at depth by unfossiliferous Precambrian (Middle Proterozoic / Mokolian) basement rocks of the Namaqua-Natal Metamorphic Province, including a wide range of highly metamorphosed sediments and intrusive igneous rocks.

The basement rocks are extensively mantled by red aeolian (wind-blown) sand of the Gordonia Formation (Kalahari Group) (Qg, white with yellow stripes), Late Caenozoic calcretes (T, dark yellow), surface gravels as well as alluvial sands and gravels (several of these superficial deposits are not mapped at 1: 250 000 scale).

The overall palaeontological sensitivity of the entire study area is rated as LOW.

6.8.1 Conclusion and recommendations of palaeontological specialist

The igneous and metamorphic Precambrian basement rocks underlying the Bloemsmond 4 site and associated grid connection study area at depth are entirely unfossiliferous. The overlying Late Caenozoic aeolian sands, calcretes and stream gravels of the Kalahari Group mantling the older bedrocks are generally of low palaeontological sensitivity, although occasional concentrations of fossil material (e.g. mammalian bones and teeth, trace fossils) may occur here.

It is concluded that the proposed Bloemsmond 4 is unlikely to have significant impacts on local palaeontological heritage resources.

A considerable number of solar and other renewable energy developments have been proposed on both sides of the Gariep River in the Upington region of the Northern Cape, as shown on the SAHRIS website. However, few palaeontological assessment reports (PIAs) are available for these projects, including those in the vicinity of Farm Bloemsmond 455 (e.g. Durand 2013, Almond 2014a, 2014b,

2015). In all the reports examined, the palaeontological significance of the renewable energy project was assessed as low. Given the large outcrop area of the potentially-fossiliferous, but generally low-sensitivity, Kalahari Group, it is concluded that cumulative impacts of the proposed Bloemsmond PV energy facilities and associated grid connections in the context of other developments in the region are of LOW impact significance.

6.9 VISUAL IMPACTS

Mr Stephen Stead of VRMA, undertook a detailed visual impact assessment of the proposed Bloemsmond 4. A copy of this assessment is attached in **Annexure E6** of the BAR and a summary thereof is provided below.

Due to the fact that various development components result in very different visual impacts, these components are discussed and assessed separately in the following sections.

It is important to note that due to the remoteness of the locality, no significant receptors were identified within the project zone of visual influence and as such, a contrast rating exercise was not undertaken, and only landscape impacts were assessed.

6.9.1 Visual Impacts of PV structures and Infrastructure

The following landscape impacts were identified by the specialist as having a likelihood of occurring during the construction of Bloemsmond 4.

- Loss of site landscape character from the removal of vegetation and the construction of the PV structures and associated infrastructure;
- Wind-blown dust due to the removal of large areas of vegetation;
- Possible soil erosion from temporary roads crossing drainage lines;
- Windblown litter from the laydown and construction sites.

The following landscape impacts were identified by the specialist as having a likelihood of occurring during the operation of Bloemsmond 4.

- Light spillage making a glow effect that would be clearly noticeable to the surrounding dark sky night landscapes to the north of the proposed site;
- Massing effect on the landscape from a large-scale modification;
- On-going soil erosion;
- On-going windblown dust.

The following landscape impacts were identified by the specialist as having a likelihood of occurring during the decommissioning of Bloemsmond 4.

- Movement of vehicles and associated dust;
- Windblown dust from the disturbance of cover vegetation / gravel.

The following cumulative landscape impacts were identified by the specialist as having a likelihood of occurring as a result of the development of Bloemsmond 4.

- A long-term change in land use setting a precedent for other similar types of solar and wind energy projects.
- Loss of scenic resources located on the adjacent property to the west that could influence future eco-tourism opportunities in this area.

The assessment of these impacts as a result of the PV arrays and associated infrastructure are shown in the table below

Table 30: Assessment of visual impacts associated with Bloemsmond 4 – PV arrays and associated structures.

| Nature: Change of local and surrounds visual resources due to the construction and operation of the proposed (3.5m high) PV structures, and buildings. | | |
|---|---|------------------------|
| | Without mitigation | With mitigation |
| Extent | Local | Local |
| Duration | Long-term | Long-term |
| Magnitude | Medium | Low |
| Probability | Probable | Probable |
| Significance | Medium to Low | Low |
| Status (positive or negative) | Negative | Negative |
| Reversibility | Possible | Possible |
| Irreplaceable loss of resources? | No | No |
| Can impacts be mitigated? | Yes | Yes |
| Mitigation: | See section 7 of this BAR for a summary of suggested mitigation measures | |
| Cumulative impacts: | From a cumulative perspective, locating power line and road access to the west in close proximity to the western scenic resources, could reduce the potential for future eco-tourism opportunities in this area. Given that there is game farming taking place in the area, this is a possibility. Excessive lights at night could reduce the current dark sky sense of place that could detract from tourism opportunities in the area. | |
| Residual Risks: | Should the mitigations be implemented, the residual risks to the dark sky sense of place would be similar to the solar PV precedent of the adjacent eastern projects (currently under construction), and with mitigation, would be similar to the nighttime lighting precedents of the cultivated areas along the Orange River. With the associated power line and vehicle access located away from the western scenic resources, the low profile and prominence of the PV panels would result in a low intensity landscape impact and are not likely to degrade the scenic resource. On decommissioning, the limited earthworks required for the construction of the PV panels, would allow for effective rehabilitation of the impacted area back to the current agricultural land use and associated rural sense of place. | |

6.9.2 Visual Impacts of access road

The table below includes the assessment of the visual impacts associated with the Eastern access road alternative (preferred alternative)

Table 31: Assessment of visual impacts associated with the preferred access road.

| Nature: Change of local and surrounds visual resources due to the construction and operation of the proposed road access. | | |
|--|--|------------------------|
| | Without mitigation | With mitigation |
| Extent | Local | Local |
| Duration | Long-term | Long-term |
| Magnitude | Medium | Low |
| Probability | Probable | Probable |
| Significance | Medium to Low | Low |
| Status (positive or negative) | Negative | Negative |
| Reversibility | Possible | Possible |
| Irreplaceable loss of resources? | No | No |
| Can impacts be mitigated? | Yes | Yes |
| Mitigation: | Please see section of this BAR for a summary of all mitigation measures. | |
| Cumulative impacts: | From a cumulative perspective, the location of the power line and road access to the east would reduce exposure to western scenic resources that have the potential for future eco-tourism opportunities. Given that there is game farming | |

| | |
|------------------------|---|
| | taking place in the area, this is a possibility. |
| Residual Risks: | If the associated power line and vehicle access is located away from the western scenic resources, a low intensity landscape impact is more likely, posing less threat of the degradation of the western scenic resources.. On decommissioning, the limited footprint required for the construction of the roads, would allow for effective rehabilitation of the impacted area back to the current agricultural land use and associated rural sense of place. |

6.9.3 Conclusion and Recommendation of visual specialist.

Due to the relative remoteness of the locality and some topographic screening, no sensitive receptors were identified for the site, and as such Visual Exposure and Sensitivity to landscape change for both PV sites is defined as Low. Based on the VRM methodology, the scenic quality of the area is defined as medium. However, scenic resources that include low hills, rocky outcrops and long red dunes were identified to the west of the property and these scenic resources would fall within the project zone of visual influence. These landscape features do add value to the regional landscape context and have potential for eco-tourism, adding value to the existing game farming taking place in the area. As such, there is a need to protect these resources from higher levels of visual intrusion.

There is a good policy fit for the PV project (located within the REDZ 7), and the low profile of the PV panels, and southern location of the PV panels would be accommodated by the higher VAC levels created by the adjacent, authorised Bloemsmond 1 and 2 projects once they are constructed. The only landscape concern associated with the project relates to the alignment of the proposed access road up the western property boundary. (The western access road alternative has been identified as least preferred alternative as part of this environmental process). The visual specialist has recommended that road and power line routings are located away from the western scenic resources, and the eastern road access alternatives (and Power Line Routing) are preferred.

In terms of the PV facility, there is also a strong landscape preference for the Bloemsmond 4 preferred site as this location is directly adjacent to the authorised Bloemsmond 1 and 2 projects.

The northern alternative site is located approximately 10km north of the existing (authorised) PV precedent, and in a remote location that currently has a relatively intact wilderness sense of place.

The visual specialist has thus confirmed that preferred alternative for Bloemsmond 4 is unlikely to result in the loss of significant visual and scenic resources, and as such should be allowed to proceed with mitigation.

6.10 FRESHWATER ECOLOGY IMPACTS

Dr Jackie Dabrowski of confluent Environmental, undertook a detailed freshwater ecology assessment of the proposed Bloemsmond 4. A copy of this assessment is attached in **Annexure E2** of the BAR and a summary thereof is provided below.

The impact assessment considers direct, indirect and cumulative impacts to the aquatic ecosystem that may arise during the following phases

- Layout and design phase;
- Construction phase;
- Operational phase;
- Decommissioning phase;

The potential impacts in each of these phases are identified and assessed in the sub-sections below.

6.10.1 layout and design phase impacts

It is important to note that the Preferred Layout Alternative for Bloemsmond 4 was determined with prior inputs from both the aquatic and terrestrial specialist studies regarding sensitive areas at the site. As a result the Preferred Layout Alternative already avoids most moderate to high sensitivity features. For the most part, this upfront consultation has already mitigated many of the impacts associated with the planning and design phase. Pans and drainage lines still occur in Bloemsmond 4, all the pans have been excluded, however, drainage lines in particular are so numerous in the landscape that it is not realistic to expect that the development will avoid every single one. The suggested mitigations in instances where infrastructure encroaches into the ephemeral drainage features is summarised in section 7 of this BAR.

Another important consideration to take into account during the Design and Planning Phases is proper stormwater management. To this end, a detailed stormwater management plan has been developed for the facility. A copy of this plan is attached in **Annexure E13**, with the recommended measures summarised in section 7 of the BAR.

Table 32: Assessment of Freshwater Ecology impacts for the layout and design phase of Bloemsmond 4.

| Impact | Intensity | Duration | Extent | Probability | Significance | Reversibility | Irreplaceability | Confidence |
|---|-----------|-------------|--------------|-------------|--------------|---------------|------------------|------------|
| Impact: Further refinement of the development layout | | | | | | | | |
| Without mitigation | Moderate | Long term) | Limited | Probably | Minor | Medium | Low | Medium |
| With mitigation | Low | Short term | Very limited | Unlikely | Negligible | Medium | Low | High |
| Impact: Stormwater management | | | | | | | | |
| Without mitigation | Moderate | Medium Term | Limited | Probably | Minor | Medium | Low | High |
| With mitigation | Low | Short Term | Local | Rare | Negligible | High | Low | High |

6.10.2 Construction phase impacts

The freshwater ecologist the following potential impacts applicable to the construction phase of Bloemsmond 4.

- Disturbance to riparian habitat;
- Disturbance to watercourse bed and banks;
- Sedimentation of downstream watercourses;
- Water Quality Impacts; and
- Alien plant introduction

The assessment of these impacts are included in the in the table below, and the proposed mitigations are summarised in section 7 of the BAR.

Table 33: Assessment of Freshwater Ecology impacts for construction phase of Bloemsmond 4.

| Impact | Intensity | Duration | Extent | Probability | Significance | Reversibility | Irreplaceability | Confidence |
|--|-----------|-------------|--------------|-------------|--------------|---------------|------------------|------------|
| Impact: Disturbance to riparian habitat | | | | | | | | |
| Without mitigation | Low | Medium term | Very limited | Probably | Minor | High | Low | High |

| Impact | Intensity | Duration | Extent | Probability | Significance | Reversibility | Irreplaceability | Confidence |
|---|-----------|-------------|--------------|-------------|--------------|---------------|------------------|------------|
| With mitigation | Very low | Short term | Very limited | Probably | Negligible | High | Low | High |
| Impact: Disturbance to watercourse bed and banks | | | | | | | | |
| Without mitigation | High | Medium term | Limited | Probably | Minor | Medium | Low | High |
| With mitigation | Low | Short term | Very limited | Unlikely | Negligible | High | Low | High |
| Impact: Sedimentation of downstream watercourses | | | | | | | | |
| Without mitigation | Moderate | Medium term | Local | Probably | Minor | Medium | Low | High |
| With mitigation | Low | Short term | Limited | Unlikely | Negligible | High | Low | High |
| Impact: Water quality impacts downstream | | | | | | | | |
| Without mitigation | Low | Short term | Limited | Probably | Negligible | High | Low | Medium |
| With mitigation | Very low | Brief | Very Limited | Rare | Negligible | High | Low | Medium |
| Impact: Alien plant introduction | | | | | | | | |
| Without mitigation | High | Long term | Local | Probably | Minor | Medium | Medium | High |
| With mitigation | Very low | Short term | Limited | Unlikely | Negligible | High | Low | High |

6.10.3 Operational phase impacts

The freshwater ecologist the following potential impacts applicable to the operational phase of Bloemsmond 4.

- Alien Vegetation Management
- Solar Panel Washing
- Spills and Waste Management

The assessment of these impacts are included in the in the table below, and the proposed mitigations are summarised in section 7 of the BAR.

Table 34: Assessment of Freshwater Ecology impacts for the operation phase of Bloemsmond 4.

| Impact | Intensity | Duration | Extent | Probability | Significance | Reversibility | Irreplaceability | Confidence |
|--|------------|-------------|--------------|-----------------|--------------|---------------|------------------|------------|
| Impact: Alien Vegetation Management | | | | | | | | |
| Without mitigation | High | Ongoing | Local | Probably | Minor | Medium | Medium | High |
| With mitigation | Very low | Short term | Limited | Rare | Negligible | High | Low | High |
| Impact: Solar Panel Washing | | | | | | | | |
| Without mitigation | Very low | Brief | Limited | Unlikely | Negligible | High | Low | Medium |
| With mitigation | Negligible | Immediate | Very limited | Highly unlikely | Negligible | High | Low | High |
| Impact: Spills and Waste Management | | | | | | | | |
| Without mitigation | Moderate | Medium term | Limited | Unlikely | Negligible | Medium | Medium | Medium |
| With mitigation | Very low | Immediate | Very limited | Highly unlikely | Negligible | High | Low | High |

6.10.4 Cumulative and landscape-scale impacts

This section of the impact assessment considers both the cumulative impacts of multiple PV arrays planned for Bloemsmond Farm 455 as well as other solar developments in the vicinity.

While most of the environmental impacts in their mitigated state (related to aquatic ecosystem health) may be considered negligible at the scale of a single PV development, gridline or road, the

accumulation of impacts at the landscape scale could be a concern. Bloemsmond Farm 455 and surrounding areas are located within Renewable Energy Development Zone (REDZ) 7, which has been identified for large scale photovoltaic energy facilities. The increase in solar developments in REDZ has not been matched by an increase in the depth of understanding of associated environmental impacts, particularly the cumulative impacts (Rudman *et al.*, 2017). However, the consideration of cumulative impacts is constrained by the current approach to assess developments separately.

A substantial portion of the SQR of the Helbrandkloofspruit and the Helbrandleegte Stream will potentially be affected by solar developments. Disturbance during construction phases at the very least will reduce vegetation cover and disturb soil over an extended area which is likely to increase the amount of erosion and subsequent sedimentation along this drainage line and associated tributaries, ultimately reaching the Orange River. Given the infrequency of rainfall in the area this may fortunately happen at a relatively slow rate. Wide-scale disturbance to vegetation is likely to exacerbate erosion and may lead to significant invasion by alien vegetation if this issue is not consistently managed by the various land owners and plant management.

Although the vegetation types Kalahari Karroid Shrubland and Bushmanland Arid Grassland are classified as Least Threatened, they are both in the top five vegetation types affected by solar developments. Bushmanland Arid Grassland is one of the most utilised vegetation types for solar facilities (Rudman *et al.*, 2017).

A total of five PV projects (Bloemsmond 1 – 5) are being proposed for Bloemsmond Farm 455. In all cases specialists have been consulted upfront regarding the proposed layout of PV arrays through the provision of sensitivity maps. At Bloemsmond Farm 455 this has ensured that the impacts affecting medium and high sensitivity watercourses (particularly pans and large wooded drainage lines) will be kept to the absolute minimum, with other impacts being unavoidable access roads crossing watercourses. This is also very important for maintaining a degree of connectivity at the landscape level, as drainage lines are frequently used for movement and other functions by a wide range of animals. They also provide additional habitat for wildlife occurring along the Orange River. A large proportion of sensitive habitat at the site will be left intact between solar arrays which will provide corridors for wildlife. Additional cumulative impacts will be related to the construction of gridlines assessed in this study. It is likely that further gridlines will be required to connect the range of other PV developments in the area.

From a hydrological and geomorphological perspective, the main cumulative impact is likely to be an overall increase in concentrated flows in drainage lines due to increased levels of runoff when it rains. The resulting effect on habitat will be to erode some stream sections and increase sediment deposits in larger river beds, which are already naturally sandy. Provided these effects are not too severe at the landscape level, they should not result in major detrimental impacts on water resources at the site or in the Orange River.

The following mitigation measures in the future will ensure that the cumulative impact is kept to a minimum.²⁹

- Future planning of solar developments should follow a similar process in that environmental specialists should be consulted during the planning and layout phase to identify any sensitive or no-go areas so they can be avoided;
- Solar developments and associated infrastructure (e.g. gridlines) should have little to no infrastructure within the medium to high sensitivity drainage lines as well as their buffers;

²⁹ These mitigations are not summarised in section 7 of this BAR as they are not applicable to Bloemsmond 4, but rather for consideration of the area as a whole.

- Riparian vegetation along medium to high sensitivity drainage lines should be left untouched as far as possible;
- Access roads should be planned to utilize existing tracks (even between neighboring properties if possible) and limit stream crossings to the absolute minimum;
- Monitor the PES of major watercourses at specific sites in order to detect long term changes and isolate impacts requiring intervention. Focus on levels of sedimentation and erosion, as well as other habitat degradation indicators;
- Select and recommend development options that maintain connectivity in the landscape to support the movement of wildlife and limit the impact to watercourses as far as possible. The latter would include corridors to pans to ensure access by a range of fauna.

6.10.5 Conclusion and recommendations of freshwater specialist.

The PV developments and associated infrastructure proposed for Bloemsmond Farm 455 have been well planned in terms of considering environmentally sensitive areas in the planning and layout phase. The layout can be further refined using the suggested mitigation measures in this report. While impacts to watercourses at Bloemsmond Farm 455 and within the footprint of roads and gridlines are inevitable, the majority of these are considered negligible in their mitigated state. Provided the site is well managed during the construction and operational phase, following suggested mitigation measures, the development is considered as a positive contribution to the alternative energy needs of South Africa.

6.11 SOCIAL IMPACTS

Mr Tony Barbour undertook a Social Impact Assessment of the proposed Bloemsmond 4. A copy of this assessment is included in **Annexure E7** and the following summary is provided in this regard.

The social specialist divided his assessment into the following sections which are discussed separately below.

- Assessment of compatibility with relevant policy and planning context;
- Assessment of social issues associated with the construction phase;
- Assessment of social issues associated with the operational phase;
- Assessment of social issues associated with the decommissioning phase;
- Assessment of the no go alternative; and
- Assessment of cumulative impacts.

6.11.1 Assessment of social impacts associated with policy and planning.

The findings of the review indicate that renewable, including solar energy, is strongly supported at a national, provincial and local level.

6.11.2 Assessment of social impacts associated with the construction phase

The social specialist identified both positive and negative impacts associated with the construction phase, these impacts were identified as follows:

- Creation of employment and business opportunities, and opportunity for skills development and on-site training (Positive Impact);
- Impacts associated with the presence of construction workers on local communities;
- Impacts related to the potential influx of job-seekers;
- Increased risks to livestock and farming infrastructure associated with the construction related activities and presence of construction workers on the site;
- Increased risk of grass fires associated with construction related activities;

- Noise, dust and safety impacts of construction related activities and vehicles; and
- Impact on productive farmland.

An assessment of these identified social impacts during construction are included in the tables below.

Table 35: Assessment of positive social impacts during the construction phase

| Nature: Creation of employment and business opportunities during the construction phase | | |
|--|---|-------------------------|
| | Without Mitigation | With Enhancement |
| Extent | Local – Regional (3) | Local – Regional (4) |
| Duration | Short term (2) | Short term (2) |
| Magnitude | Moderate (6) | High (8) |
| Probability | Highly probable (4) | Highly probable (4) |
| Significance | Medium (44) | Medium (56) |
| Status | Positive | Positive |
| Reversibility | N/A | N/A |
| Irreplaceable loss of resources? | N/A | N/A |
| Can impact be enhanced? | Yes | |
| Enhancement: | see section 7 of the BAR dealing with suggested mitigation measures | |
| Cumulative impacts: | Opportunity to up-grade and improve skills levels in the area. | |
| Residual impacts: | Improved pool of skills and experience in the local area. | |

Table 36: Assessment of negative social impacts during the construction phase

| Nature: Potential impacts on family structures and social networks associated with the presence of construction workers | | |
|--|---|---|
| | Without Mitigation | With Mitigation |
| Extent | Local (2) | Local (1) |
| Duration | Short term for community as a whole (2) | Short term for community as a whole (2) |
| Magnitude | Moderate for the community as a whole (6) | Low for community as a whole (4) |
| Probability | Probable (3) | Probable (3) |
| Significance | Medium for the community as a whole (30) | Low for the community as a whole (21) |
| Status | Negative | Negative |
| Reversibility | No in case of HIV and AIDS | No in case of HIV and AIDS |
| Irreplaceable loss of resources? | Yes, if people contract HIV/AIDS. Human capital plays a critical role in communities that rely on farming for their livelihoods | Yes, if people contract HIV/AIDS. Human capital plays a critical role in communities that rely on farming for their livelihoods |
| Can impact be mitigated? | Yes, to some degree. However, the risk cannot be eliminated | |
| Mitigation: | See mitigation measures reflected in section 7 of the BAR. | |
| Cumulative impacts: | Impacts on family and community relations that may, in some cases, persist for a long period of time. Also in cases where unplanned / unwanted pregnancies occur or members of the community are infected by an STD, specifically HIV and or AIDS, the impacts may be permanent and have long term to permanent cumulative impacts on the affected individuals and/or their families and the community. | |

| | | |
|---|---|---|
| Residual impacts: | Same as cumulative impacts assessed above | |
| Assessment of No Go option | There is no impact as the current status quo would be maintained. The potential positive impacts on the local economy associated with the additional spending by construction workers in the local economy will also be lost. | |
| Nature: Potential impacts on family structures, social networks and community services associated with the influx of job seekers | | |
| | Without Mitigation | With Mitigation |
| Extent | Local (2) | Local (1) |
| Duration | Permanent (5) (For job seekers that stay on the town) | Permanent (5) (For job seekers that stay on the town) |
| Magnitude | Minor (2) | Minor (2) |
| Probability | Probable (3) | Probable (3) |
| Significance | Low (27) | Low (24) |
| Status | Negative | Negative |
| Reversibility | No in case of HIV and AIDS | No in case of HIV and AIDS |
| Irreplaceable loss of resources? | Yes, if people contract HIV/AIDS. Human capital plays a critical role in communities that rely on farming for their livelihoods | Yes, if people contract HIV/AIDS. Human capital plays a critical role in communities that rely on farming for their livelihoods |
| Can impact be mitigated? | Yes, to some degree. However, the risk cannot be eliminated | |
| Mitigation: | See section 7 of the BAR for a summary of the mitigation measures. | |
| Cumulative impacts: | Impacts on family and community relations that may, in some cases, persist for a long period of time. Also in cases where unplanned / unwanted pregnancies occur or members of the community are infected by an STD, specifically HIV and or AIDS, the impacts may be permanent and have long term to permanent cumulative impacts on the affected individuals and/or their families and the community. | |
| Residual impacts: | Same as cumulative impacts assessed above | |
| Assessment of No-Go option | There is no impact as it maintains the current status quo. | |
| Nature: Potential risk to safety of scholars, farmers and farm workers, livestock and damage to farm infrastructure associated with the presence of construction workers on site | | |
| | Without Mitigation | With Mitigation |
| Extent | Local (3) | Local (2) |
| Duration | Short term (2) | Short term (2) |
| Magnitude | Medium (6) | Low (4) |
| Probability | Probable (3) | Probable (3) |
| Significance | Medium (33) | Low (24) |
| Status | Negative | Negative |
| Reversibility | Yes, compensation paid for stock losses and damage to farm infrastructure etc. | Yes, compensation paid for stock losses and damage to farm infrastructure etc. |

| | | |
|---|---|---|
| Irreplaceable loss of resources? | No | No |
| Can impact be mitigated? | Yes | |
| Mitigation: | See section 7 of the BAR for a summary of the Mitigation Measures. | |
| Cumulative impacts: | No, provided losses are compensated for. | |
| Residual impacts: | See cumulative impacts above. | |
| Assessment of No-Go option | There is no impact as it maintains the current status quo. | |
| Nature: Potential loss of livestock, crops and houses, damage to farm infrastructure and threat to human life associated with increased incidence of grass fires | | |
| | Without Mitigation | With Mitigation |
| Extent | Local (4) | Local (2) |
| Duration | Short term (2) | short term (2) |
| Magnitude | Moderate due to reliance on agriculture for maintaining livelihoods (6) | Low (4) |
| Probability | Probable (3) | Probable (3) |
| Significance | Medium (36) | Low (24) |
| Status | Negative | Negative |
| Reversibility | Yes, compensation paid for stock and crop losses etc. | Yes, compensation paid for stock and crop losses etc. |
| Irreplaceable loss of resources? | No | No |
| Can impact be mitigated? | Yes | |
| Mitigation: | See section 7 of the BAR for a summary of mitigation measures. | |
| Cumulative impacts: | No, provided losses are compensated for. | |
| Residual impacts: | See cumulative impacts. | |
| Assessment of No-Go option | There is no impact as it maintains the current status quo. | |
| Nature: Potential noise, dust and safety impacts associated with movement of construction related traffic to and from the site | | |
| | Without Mitigation | With Mitigation |
| Extent | Local (2) | Local (1) |
| Duration | Short Term (2) | Short Term (2) |
| Magnitude | Medium (6) | Minor (2) |
| Probability | Probable (3) | Probable (3) |
| Significance | Medium (30) | Low (15) |
| Status | Negative | Negative |
| Reversibility | Yes | Yes |
| Irreplaceable loss of resources? | No | No |
| Can impact be mitigated? | Yes | |
| Mitigation: | See section 7 of the BAR for a summary of Mitigation measures | |
| Cumulative impacts: | If damage to local farm roads is not repaired then this will affect the farming activities in the area and result in higher maintenance costs for | |

| | | |
|---|---|--|
| | vehicles of local farmers and other road users. The costs will be borne by road users who were not responsible for the damage. Dust impacts to vineyards could also impact on future contracts. | |
| Residual impacts: | See cumulative impacts above. | |
| Assessment of No-Go option | There is no impact as it maintains the current status quo. | |
| Nature: The activities associated with the construction phase, such as establishment of access roads and the construction camp, movement of heavy vehicles and preparation of foundations for the SEF and power lines will damage farmlands and result in a loss of farmlands for grazing. | | |
| | Without Mitigation | With Mitigation |
| Extent | Local (1) | Local (1) |
| Duration | Long term-permanent if disturbed areas are not effectively rehabilitated (5) | Short term if damaged areas are rehabilitated (2) |
| Magnitude | Medium (6) | Minor (2) |
| Probability | Probable (3) | Highly Probable (4) |
| Significance | Medium (36) | Low (20) |
| Status | Negative | Negative |
| Reversibility | Yes, disturbed areas can be rehabilitated. | Yes, disturbed areas can be rehabilitated. |
| Irreplaceable loss of resources? | Yes, loss of farmland. However, disturbed areas can be rehabilitated | Yes, loss of farmland. However, disturbed areas can be rehabilitated |
| Can impact be mitigated? | Yes, however, loss of farmland cannot be avoided | |
| Mitigation: | See below | |
| Cumulative impacts: | Overall loss of farmland could affect the livelihoods of the affected farmers, their families, and the workers on the farms and their families. However, disturbed areas can be rehabilitated. | |
| Residual impacts: | See cumulative impacts. | |
| Assessment of No-Go option | There is no impact as it maintains the current status quo. | |

6.11.3 Assessment of social Impacts Associated with the operational phase.

The social specialist identified both positive and negative impacts associated with the operational phase of the development, these impacts were identified as follows:

- The establishment of renewable energy infrastructure (positive);
- Creation of employment and business opportunities. The operational phase will also create opportunities for skills development and training (positive);
- Generation of additional income for the landowner (positive);
- Benefits associated with the establishment of a Community Trust (positive);
- The visual impacts and associated impact on sense of place; and
- Potential impact on tourism.

An assessment of both these positive and negative impacts are included in the tables below.

Table 37: Assessment of positive social impacts during the operational phase.

| Nature: Development of infrastructure to generate clean, renewable energy | | |
|--|---|---|
| | Without Mitigation | With Mitigation |
| Extent | Local, Regional and National (4) | Local, Regional and National (5) |
| Duration | Long term (4) | Long term (4) |
| Magnitude | High (8) | High (8) |
| Probability | Highly Probable (4) | Definite (5) |
| Significance | High (64) | High (85) |
| Status | Positive | Positive |
| Reversibility | Yes | |
| Irreplaceable loss of resources? | Yes, impact of climate change on ecosystems | Reduced CO ₂ emissions and impact on climate change. |
| Can impact be mitigated? | Yes | |
| Enhancement: | See section 7 of the BAR for a summary of mitigation measures (these measures include the relative enhancement opportunities) | |
| Cumulative impacts: | Overall reduction in CO ₂ emission, reduction in water consumption for energy generation, contribution to establishing an economically viable commercial renewables generation sector in the Northern Cape and South Africa. | |
| Residual impacts: | See cumulative impacts above | |
| Assessment of No-Go option | The No-Development option would represent a lost opportunity for South Africa to supplement its current energy needs with clean, renewable energy. | |
| Nature: Creation of employment and business opportunities associated with the operational phase | | |
| | Without Mitigation | With Enhancement |
| Extent | Local and Regional (1) | Local and Regional (2) |
| Duration | Long term (4) | Long term (4) |
| Magnitude | Low (4) | Low (4) |
| Probability | Probable (3) | Definite (5) |
| Significance | Low (27) | Medium (50) |
| Status | Positive | Positive |
| Reversibility | N/A | N/A |
| Irreplaceable loss of resources? | No | No |
| Can impact be enhanced? | Yes | |
| Enhancement: | See section 7 of the BAR for a summary of mitigation measures (these measures include the relative enhancement opportunities) | |
| Cumulative impacts: | Creation of permanent employment and skills and development opportunities for members from the local community and creation of additional business and economic opportunities in the area | |
| Residual impacts: | See cumulative impacts above | |
| Assessment of No-Go option | There is no impact as it maintains the current status quo. However, the potential opportunity costs in terms of the loss of employment and skills and development training would be lost. | |
| Nature: Establishment of a community trust funded by revenue generated from the sale of energy. The revenue can be used to fund local community development | | |

| | Without Mitigation | With Enhancement |
|---|--|------------------------|
| Extent | Local and Regional (2) | Local and Regional (3) |
| Duration | Long term (4) | Long term (4) |
| Intensity | Low (4) | Moderate (6) |
| Likelihood | Probable (3) | Definite (5) |
| Significance | Medium (30) | High (65) |
| Status | Positive | Positive |
| Reversibility | Yes | Yes |
| Can impact be enhanced? | Yes | |
| Enhancement: | See section 7 of the BAR for a summary of mitigation measures (these measures include the relative enhancement opportunities) | |
| Cumulative impacts: | Promotion of social and economic development and improvement in the overall well-being of the community | |
| Residual impacts: | See cumulative impacts | |
| Assessment of No-Go option | There is no impact as it maintains the current status quo. However, the potential opportunity costs in terms of the supporting the social and economic development in the area would be lost. This would also represent a negative impact. | |
| Nature: The generation of additional income represents a significant benefit for the local affected farmer(s) and reduces the risks to their livelihoods posed by droughts and fluctuating market prices for sheep and farming inputs, such as feed etc. (+) | | |
| | Without Mitigation | With Enhancement |
| Extent | Local (1) | Local (3) |
| Duration | Long term (4) | Long term (4) |
| Intensity | Low (4) | Moderate (6) |
| Likelihood | Probable (3) | Definite (5) |
| Significance | Low (27) | Medium (53) |
| Status | Positive | Positive |
| Reversibility | Yes | Yes |
| Can impact be enhanced? | Yes | |
| Enhancement: | See section 7 of the BAR for a summary of mitigation measures (these measures include the relative enhancement opportunities) | |
| Cumulative impacts: | Support for local agricultural sector and farming | |
| Residual impacts: | See cumulative impacts | |
| Assessment of No-Go option | There is no impact as it maintains the current status quo. | |

Table 38: Assessment of negative social impacts during the operational phase of the development.

Nature: ³⁰Visual impact associated with the proposed solar facility and the potential impact on the area's rural sense of place.

³⁰ This assessment includes visual impacts from a social perspective. Please also refer to the detailed standalone Visual Impact Assessment that was undertaken.

| | Without Mitigation | With Mitigation |
|---|---|--|
| Extent | Local (2) | Local (1) |
| Duration | Long term (4) | Long term (4) |
| Magnitude | Minor (2) | Minor (2) |
| Probability | Probable (4) | Highly Probable (4) |
| Significance | Medium (32) | Low (28) |
| Status | Negative | Negative |
| Reversibility | Yes, solar facility can be removed. | |
| Irreplaceable loss of resources? | No | No |
| Can impact be mitigated? | Yes | |
| Mitigation: | See section 7 of the BAR for a summary of the suggested mitigation measures. | |
| Cumulative impacts: | Potential impact on current rural sense of place | |
| Residual impacts: | See cumulative impacts. | |
| Assessment of No-Go option | There is no impact as it maintains the current status quo. | |
| Nature: Potential impact of the SEF on local tourism | | |
| | Without Mitigation | With Enhancement / Mitigation |
| Extent | Local (2) | Local (2) |
| Duration | Long term (4) | Long term (4) |
| Magnitude | Low (2) | Low (2) |
| Probability | Probable (3) | Probable (3) |
| Significance | Low (24) (Applies to both – and +) | Low (24) (Applies to both – and +) |
| Status | Negative (Potential to distract from the tourist experience of the area) Positive (Potential to attract people to the area) | Negative (Potential to distract from the tourist experience of the area) Positive (Potential to attract people to the area) |
| Reversibility | Yes | Yes |
| Irreplaceable loss of resources? | No | No |
| Can impact be enhanced? | Yes | |
| Enhancement: | See section 7 of the BAR for a summary of mitigation measures (including opportunities for enhancement). | |
| Cumulative impacts: | The proposed SEF is one of a number of SEFs proposed in the KGLM area. Due to size and height of SEFs the cumulative impacts are not rated significant. | |
| Residual impacts: | See cumulative impacts | |
| Assessment of No-Go option | There is no impact as it maintains the current status quo. | |

6.11.4 Assessment of social impacts associated with the decommissioning phase

The social specialist identified negative impacts associated with loss of jobs after the decommissioning of the development. These impacts are assessed in the table below.

Table 39: Assessment of social Impacts associated with the decommissioning of the facility.

| Nature: Social impacts associated with retrenchment including loss of jobs, and source of income | | |
|---|--|------------------------|
| | Without Mitigation | With Mitigation |
| Extent | Local and regional (2) | Local and regional (1) |
| Duration | Medium Term (2) | Very Short Term (1) |
| Magnitude | Moderate (6) | Low (4) |
| Probability | Highly Probable (4) | Highly Probable (4) |
| Significance | Medium (40) | Low (24) |
| Status | Negative | Negative |
| Reversibility | Yes, assumes retrenchment packages are paid to all affected employees | |
| Irreplaceable loss of resources? | No | No |
| Can impact be mitigated? | Yes | |
| Mitigation: | See section 7 of the BAR for a summary of the suggested mitigation measures. | |
| Cumulative impacts: | Loss of jobs and associated loss of income etc. can impact on the local economy and other businesses. However, decommissioning can also create short term, temporary employment opportunities associated with dismantling etc. | |
| Residual impacts: | See cumulative impacts | |

6.11.5 Assessment of Cumulative Social Impacts.

The social specialists identified a number of cumulative impacts associated with sense of place, accommodation availability and local economics. An assessment of these potential cumulative impacts are included in the table below.

Table 40: Assessment of cumulative social impacts associated with the development.

| Nature: Visual impacts associated with the establishment of more than one SEF and the potential impact on the area's rural sense of place and character of the landscape. | | |
|--|--|------------------------|
| | Without Mitigation | With Mitigation |
| Extent | Local and regional (2) | Local and regional (2) |
| Duration | Long term (4) | Long term (4) |
| Magnitude | Low (4) | Minor (2) |
| Probability | Probable (3) | Probable (3) |
| Significance | Medium (30) | Low (24) |
| Status | Negative | Negative |
| Reversibility | Yes. Solar energy plant components and other infrastructure can be removed. | |
| Irreplaceable loss of resources? | No | No |
| Can impact be mitigated? | Yes | |
| Enhancement: | See section 7 of the BAR | |
| Cumulative impacts: | Impact on other activities whose existence is linked to rural sense of place and character of the area, such as tourism, bird watching, and hunting. | |
| Residual impacts: | See cumulative impacts | |
| Assessment of No-Go option | There is no impact as it maintains the current status quo. | |
| Nature: The establishment of a number of renewable energy facilities in the KGLM and ZFMDM will place pressure on local | | |

| services, specifically medical, education and accommodation | | |
|---|--|------------------------|
| | Without Mitigation | With Mitigation |
| Extent | Local and regional (3) | Local and regional (1) |
| Duration | Long term (4) | Long term (4) |
| Magnitude | Moderate (6) | Minor (2) |
| Probability | Highly Probable (4) | Highly Probable (4) |
| Significance | Medium (52) | Low (28) |
| Status | Negative | Negative |
| Reversibility | Yes. Solar energy plant components and other infrastructure can be removed. | |
| Irreplaceable loss of resources? | No | No |
| Can impact be mitigated? | Yes | |
| Enhancement: | See below | |
| Cumulative impacts: | Negative impact on the local services | |
| Residual impacts: | See cumulative impacts | |
| Comment on No-Go option | There is no impact as it maintains the current status quo. | |
| Nature: The establishment of a number of solar energy facilities in the KGLM and ZFMDM will create employment, skills development and training opportunities, creation of downstream business opportunities. | | |
| | Without Mitigation | With Mitigation |
| Extent | Local and regional (3) | Local and regional (4) |
| Duration | Long term (4) | Long term (4) |
| Magnitude | Low (4) | Moderate (6) |
| Probability | Highly Probable (4) | Definite (5) |
| Significance | Medium (44) | High (70) |
| Status | Positive | Positive |
| Reversibility | Yes. Solar energy plant components and other infrastructure can be removed. | |
| Irreplaceable loss of resources? | No | No |
| Can impact be mitigated? | Yes | |
| Enhancement: | See section 7 of the BAR | |
| Cumulative impacts: | Positive impact on the local and regional economy through the creation of downstream opportunities and wage spend in the local economy | |
| Residual impacts: | See cumulative impacts | |
| Assessment of No-Go option | There is no impact as it maintains the current status quo. This would represent a lost socio-economic opportunity for the KGLM. | |

6.11.6 Assessment of social impacts of the no-go alternative.

The social specialist assessed the impacts associated with lost opportunities, should the no-go alternative be implemented. The outcome of this assessment is included in the table below.

Table 41: Assessment of social impacts associated with the no-go alternative.

Nature: The no-development option would result in the lost opportunity for South Africa to supplement its current energy needs with clean, renewable energy

| | Without Mitigation | With Mitigation |
|---|---|-------------------------|
| Extent | Local-International (4) | Local-International (4) |
| Duration | Long term (4) | Long term (4) |
| Magnitude | Moderate (6) | Moderate (6) |
| Probability | Highly Probable (4) | Highly Probable (4) |
| Significance | Moderate (56) | Moderate (56) |
| Status | Negative | Positive |
| Reversibility | Yes | |
| Irreplaceable loss of resources? | N/A | N/A |
| Can impact be mitigated? | Yes | |
| Enhancement: | See section 7 of the BAR | |
| Cumulative impacts: | Reduce carbon emissions via the use of renewable energy and associated benefits in terms of global warming and climate change | |
| Residual impacts: | See cumulative impacts | |

6.11.7 Conclusion and recommendation of social specialist

The findings of the Social Impact Assessment indicate that the development of the proposed Bloemsmond 4 will create employment and business opportunities for locals during both the construction and operational phase of the project.

The establishment of a Community Trust will also benefit the local community. The enhancement measures listed in the report should be implemented in order to maximise the potential benefits. The significance of this impact is rated as High Positive. The proposed development also represents an investment in clean, renewable energy infrastructure, which, given the negative environmental and socio-economic impacts associated with a coal based energy economy and the challenges created by climate change, represents a significant positive social benefit for society as a whole. The findings of the Social Impact Assessment also indicate that the REIPPPP has resulted in significant socio-economic benefits, both at a national level and at a local, community level. These benefits are linked to foreign Direct Investment, local employment and procurement and investment in local community initiatives. The establishment of the proposed Bloemsmond 4 is therefore supported by the findings of the Social Impact Assessment.

Due the number of other renewable energy projects proposed in the local municipal area, it is recommended that the Kai !Garib Local Municipality liaise with the proponents to investigate how best the Community Trusts can be established and managed so as to promote and support local, socio-economic development in the region as a whole.

6.12 CUMULATIVE IMPACT ASSESSMENT

This section is summarised from the cumulative impact assessments that took place by each of the participating specialists. For further details in this regard, the reader is referred to the specialist assessments contained in **Appendix E**.

Where appropriate, certain specialists did include a cumulative assessment of a much wider area than the accepted 30km radius.

No potentially fatal flaws have been identified associated with cumulative impacts.

The 2014 EIA Regulations (as amended) (GNR 326) define a cumulative impact as follows:

“Cumulative impact in relation to an activity, means the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity that in itself may not be significant, but may become significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities.”

There are a number of other renewable energy facilities in the vicinity of the proposed Bloemsmond 4 as detailed in the table below.

A Strategic Environmental Assessment process was undertaken by the CSIR in order to identify geographical areas most suitable for the rollout of Renewable Energy projects and the supporting electricity grid network. The aim of the assessment was to designate REDZs within which such development will be incentivised and streamlined. Subsequent to the SEA, these REDZ have been gazetted. Bloemsmond 4 is within one of these Gezatted REDZ and as such deemed more suitable for such development on a cumulative scale.

Cumulative impacts that could occur due to the development of solar energy facilities and associated infrastructure in close proximity to each other include impacts such as:

- Visual impacts
- Socio-economic impacts
- Loss of vegetation and the inability to achieve conservation targets
- Impacts to soil and agricultural potential
- Impacts on heritage resources (in this area particularly relating to Archaeology resources)
- Surface water resources

In terms of possible cumulative impacts, one needs to look at the presence of similar facilities on the farm portion as well as the greater landscape.

- Cumulative impacts due to the cumulative effects of Bloemsmond 4 added to all other renewable energy facilities in the Upington area. These impacts need to be managed through strategic spatial planning documents such as an SEA and SDF and not through individual EIA processes.
- Cumulative impacts due to the cumulative effects of the 5 Solar Facilities proposed to be located on one site i.e. Portion 5 and 14 of the Farm Bloemsmond 455.

The table below reflects the other renewable energy facilities in close proximity to the proposed Bloemsmond 4.

Table 42: Renewable Energy Facilities in proximity to Bloemsmond 4 and their status

| # | Project | Property | Status |
|----|----------------------------------|--|--------------------|
| 1 | Khi Solar 1 (CSP) | Portion 3 of the Farm McTaggarts Camp 453 | Operational |
| 2 | Upington CSP tower 2 and 3 (CSP) | Portion 3 of the Farm McTaggarts Camp 453 | Authorised |
| 3 | Rooipunt Solar Park (PV) | Remainder farm Rooipunt 617 | Authorised |
| 4 | Sasol CSP Phase 1 and 2 (CSP) | Portions 443 and 450 of 450 van roois vley | Authorised |
| 5 | Sirius Solar One (PV) | Remainder of Farm Tungsten Lodge | In Construction |
| 6 | Sirius Solar 2 (PV) | Remainder of Farm Tungsten Lodge | Authorised |
| 7 | Sirius Solar 3 (PV) | Remainder of Farm Tungsten Lodge | EIA in Process |
| 8 | Sirius Solar 4 (PV) | Remainder of Farm Tungsten Lodge | EIA in Process |
| 9 | S-Kol (PV) | Farm Geelkop 456 | Authorised |
| 10 | Ofir ZX (PV) | Remainder of Farm 616 | Authorised |
| 11 | Sonneberg PV Facility | Portion 11 of 474 | Authorised |
| 12 | Dyasonsklip 1 | Farm Dyasonsklip 454 | Under construction |
| 13 | Dyasonsklip 2 | Farm Dyasonsklip 454 | Under construction |
| 14 | Dyasonsklip 3 | Farm Dyasonsklip 454 | Authorised |
| 15 | Dyasonsklip SEF 1 | Farm Dyasonsklip 454 | Authorised |
| 16 | AEP Bloemsmond Solar 1 | Portion 5 and 14 of Bloemsmond 455 | Authorised |

| # | Project | Property | Status |
|----|------------------------|------------------------------------|----------------|
| 17 | AEP Bloemsmond Solar 2 | Portion 5 and 14 of Bloemsmond 455 | Authorised |
| 18 | Bloemsmond 3 | Portion 5 and 14 of Bloemsmond 455 | EIA in Process |
| 19 | Bloemsmond 4 | Portion 5 and 14 of Bloemsmond 455 | EIA in Process |
| 20 | Bloemsmond 5 | Portion 5 and 14 of Bloemsmond 455 | EIA in Process |

Cape EAPrac does not have details on the exact configuration of these facilities, however, based on the assumption that each facility on average will result in the transformation of approximately 230ha, one can assume the following transformation of the two vegetation types associated with the greater area.

Table 43: Potential habitat transformation proximity to Bloemsmond 4.

| Status | Transformation Area in Hectares |
|--------------------|---------------------------------|
| In operation | 230 |
| Under construction | 675 |
| Authorised | 2530 |
| EIA in Progress | 1150 |

It is impossible to foresee how many of these projects will reach preferred bidder status in terms of the REIPPPP and will eventually be constructed. As a worst case scenario one can assume a total transformation of 4585 hectares.

Potential cumulative impacts identified for the project include various negative impacts such as loss of habitat, visual massing, loss of agricultural land an influx jobseekers and change in the area's sense of place, but also include positive cumulative impacts on the economy, business development, and employment.

From an ecological perspective, cumulative impacts associated with the development are a concern. However, the loss of the habitat within the preferred alternative is not considered highly significant, given the context surrounding the site. As a result, the overall cumulative impact of the development is considered likely to be medium.

In terms of habitat loss, the affected vegetation type is still approximately 96% intact and is an extensive vegetation type, the cumulative loss of 4585ha of habitat is not considered highly significant, especially given the spatial context of the site within a Renewable Energy Development Zone.

From a social perspective the project is deemed to have a medium positive cumulative impact from employment, skills and business opportunities and skills development and a low negative cumulative impact from large-scale in-migration of people

From a visual perspective, the cumulative visual risk to scenic resources was rated medium negative. Retaining the vegetation around the proposed PV areas will retain the surrounding agricultural sense of place, and further localise the combined zone of visual influence. With successful rehabilitation of the area back to an agricultural land use on closure, the cumulative visual risk could be reduced to negligible in the long term.

6.13 IMPACT SUMMARY

The table below summarises the significance (with mitigation) of all impacts assessed in the sections above³¹.

³¹ In order to attain these outcomes, the mitigation measures reflected in section 7 of the report need to be implemented.

For ease of easy references, impacts are visually reflected using the following colour scheme³².

All positive impacts (regardless of their significance)

Neutral or Negligible negative impacts

Very Low and Low negative impacts

Medium negative impacts

Medium – High, High and Very High negative impacts



Table 44: Summary of the significance of impacts associated with Bloemsmond 4³³.

| Impact | Significance (with mitigation) |
|---|--------------------------------|
| Social Impacts during the construction Phase | |
| Creation of employment and business opportunities | Medium positive |
| Presence of construction workers and potential impacts on family structures and social networks. | Low negative |
| Influx of job seekers. | Low negative |
| Safety risk, stock theft and damage to farm infrastructure associated with presence of construction workers. | Low negative |
| Increased risk of veld fires | Low negative |
| Impact of heavy vehicles and construction activities. | Low negative |
| Loss of farmland. | Low negative |
| Social Impacts during the operational phase | |
| Promotion of renewable energy projects | High positive |
| Creation of employment and business opportunities | Medium positive |
| Establishment of Community Trust | High positive |
| Generate income for affected landowner/s | Medium positive |
| Visual impact and impact on sense of place | Low negative |
| Impact on tourism | Low positive and negative |
| Visual Impacts during construction and operation phase | |
| Change of local and surrounds visual resources due to the construction and operation of the proposed (3.5m high) PV structures, and buildings. | Low negative |
| Change of local and surrounds visual resources due to the construction and operation of the proposed road access. | Low negative |
| Palaeontological Impacts | |
| Impact on potential palaeontological resources | Low negative |
| Agricultural Impacts | |
| Soil pollution with contaminants during the construction phase may take place, including spillages of hydrocarbon (fuel oil) and cement. This is possible during the construction of all facets of the facility: laydown area, concrete foundations of the auxiliary buildings, inverter stations subterranean cabling, main access and internal service roads. | Low negative |
| The establishment of the PV Solar facility will be done at the expense of agricultural land. The area to be lost for agricultural development would be 268ha in size. This includes the area under PV panels, internal service roads and temporary laydown area | Low negative |
| The construction of a PV Solar facility will cause impairment of the land capability with the potential risk of erosion | Low negative |
| The establishment of the PV Solar facility may alter drainage patterns with construction and cause erosion | Low negative |
| Soil pollution with contaminants during the operational phase may take place, including spillages of hydrocarbon (fuel oil) and cement. This is possible during the maintenance of the facility. | Low negative |

³² Where specialist ratings fall across 2 of the groups, the worst case is reflected in the quick reference.

³³ This includes cumulative impacts associated with the facility

| Impact | Significance (with mitigation) |
|---|--------------------------------|
| The establishment of the PV Solar facility will be done at the expense of agricultural land. Area to be lost for agricultural development would be 268 ha in size. This includes the area under PV panels, internal service roads and temporary laydown area. | Low negative |
| The quantity of available soil for agricultural production decreases as result of the footprints of these facilities. The quality of soil decreases in the way the construction of these structures alters the workability of the soil. This includes the physical deformation in the soil profile (Cumulative) | Medium negative |
| Clearing of vegetation increases flow speed and a lower infiltration tempo increases silt transport (Cumulative) | Medium negative |
| Chemicals, hazardous substances and waste used or generated during live span of the facility accumulate and pollute soil will become contaminated (Cumulative) | Medium negative |
| Freshwater Ecology Impacts | |
| Disturbance to riparian habitat | Negligable negative |
| Disturbance to watercourse bed and banks | Negligable negative |
| Sedimentation of downstream watercourses | Negligable negative |
| Water quality impacts downstream | Negligable negative |
| Alien plant introduction | Negligable negative |
| Alien Vegetation Management | Negligable negative |
| Solar Panel Washing | Negligable negative |
| Spills and Waste Management | Negligable negative |
| Terrestrial Fauna Impacts | |
| Slashing of vegetation | Medium negative |
| Rammed in H beams | Medium negative |
| Site camps and laydown areas | Medium negative |
| Direct loss of flora species of conservation concern and flora species endemic to the region | Medium negative |
| Stochastic events such as fire | Low/Medium negative |
| Staff or construction workers poaching and hunting | Low negative |
| Collisions with vehicles | Low/Medium negative |
| Intentional killing of fauna | Lownegative |
| Loss of species of conservation concern | Medium negative |
| Vegetation clearing/ construction preparation | Low/Medium negative |
| Access roads and construction works | Low/Medium negative |
| Solar panels (operational) | Low/Medium negative |
| Vehicles and machinery | Medium negative |
| Soil disturbance | Low/Medium negative |
| Vegetation clearing | Low/Medium negative |
| Roads and hardened surfaces | Low/Medium negative |

As can be seen from the table above, there are a number of positive impact associated with Bloomsmond 3. The majority of the negative impacts are either low or negligible, with a few Low – Medium and Medium Impacts. There are no high or very high impacts associated with Bloomsmond 4.

6.14 IMPACT STATEMENT

None of the participating specialists identified any impacts that remain high after mitigation. Because of the risk adverse approach followed for the development of the preferred layout, all the main sensitive features, (most notably Water Courses, Pans, Archaeology Features and visually sensitive areas) were avoided.

From an ecological perspective the development footprint of the Preferred site will not result in major fragmentation of the landscape. The affected area is considered suitable for development and there are no impacts associated with Bloomsmond 4 that cannot be mitigated to a medium level. As such there are no fatal flaws or high post-mitigation impacts that should prevent the development from proceeding. Based on the layout provided for the assessment, Bloomsmond 4 can be supported from an ecology, visual, social, heritage and agricultural point of view.

A map showing the proposed activity in relation to the key sensitive features is in attached in **Appendix D**. All sensitive features along with their appropriate buffers are shown in this plan. As required by the EMPr, all areas outside of the proposed development footprint are to be demarcated as no go areas.

Please refer to the table in the section above listing the key impacts and their significance post mitigation for the preferred alternative. This section must be read in conjunction with the suggested mitigation measures listed in section 7 of this Report.

The table below shows the listed activities applied for with a reference of where the impacts associated with the specific activity are assessed by specialists.

Table 45: Specialist Impact Assessment of Listed Activities.

| Listed activity as described in GN R.983, 984 and 985 | Reference to Impact Assessment |
|--|--|
| Regulation 983 – Basic Assessment | |
| GN R983 Activity 11: <i>The development of facilities or infrastructure for the transmission and distribution of electricity-</i> (i) <i>outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts; or</i> (ii) <i>inside urban areas or industrial complexes with a capacity of 275 kilovolts or more.</i> | Annexures E1, E2, E3, E4, E5, E7, E8, E12, E13 & E14. |
| GN R983 Activity 12: The development of- (xii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs- (a) within a watercourse; (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; | Annexures E1, E8, E11 & E13 |
| GN R983 Activity 19: <i>The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic</i> (i) <i>a watercourse;</i> | Annexures E1, E8, E11 & E13 |
| Regulation 984 – S&EIR | |
| GN R984 Activity 1: The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more, excluding where such development of facilities or infrastructure is for photovoltaic installations and occurs within an urban area. | Annexures E1, E2, E3, E4, E5, E7, E8, E10, E12, E13 & E14. |
| GN R984 Activity 15: The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for- (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan. | Annexures E1, E2, E3, E4, E5, E7, E8, E10, E12, E13 & E14. |

7. MITIGATION MEASURES

Please refer to the table below, which summarises the mitigation measures recommended by both the Specialists and Cape EAPrac. This table summarises the mitigations, and details whether they should be included as conditions of approval, or whether they have been included as actions in the EMPr. In

instances where suggested mitigations have already been incorporated into the design phase, they have been reflected as such.

Table 46: Mitigation measures required for the construction, operation and decommissioning of the Bloemsmond 4 development.

| Mitigation | Condition of Approval | Included in EMPr |
|---|--|------------------|
| Agriculture | | |
| Installation of proper Erosion control, and drainage on the access road. | | ✓ |
| Dust control on the access road during construction. | | ✓ |
| The general objective is to position the PV facilities on the lowest potential soil and not in places that may have impact on agricultural activities, drainage lines and places with a sensitive nature. Existing road alignments are followed and roads upgraded for use during the live span of facility. With the appropriate planning, the same live style can be achieved during the lease period of the facility from the land so occupied by the facility. | Already mitigated with the design of the preferred layout. | |
| Refuelling normally takes place in the workshop of the control building. A designated area for refuelling must be constructed with an impervious floor and low wall that will keep the spillage inside. Any spillage must be cleaned with absorbent material as soon as possible and disposed into clearly marked containers. Where spillage takes place, contaminated soil must be excavated and replaced with unpolluted soil. The contaminated soil should be collected by a licenced landfill contractor. | | ✓ |
| Ensure that most infrastructure features are erected on transformed or non-arable land. Implement stormwater management as an integral part of planning and as a guideline for the positioning of structures. Use existing roads and conservation structures to the maximum in the planning and operation phases. Rehabilitate disturbed areas as soon as possible after construction. | Already mitigated with the design of the preferred layout. | |
| Erosion and sediment control with proper water run-off control planning. | | ✓ |
| Appropriate handling and storage of chemicals and hazardous substances and waste should be done. | | ✓ |
| When spillage accidentally takes place, it should be removed and replaced with unpolluted soil. The clean soil can be sourced from excavations nearby. The polluted soil must be piled at a temporary storage facility with a firm waterproof base and is protected from inflow of storm water. It must have an effective drainage system to a waterproof spillage collection area. Contaminated soil must be disposed of at a hazardous waste storage facility. | | ✓ |
| Clear trees and bushes selectively, leaving grass un-disturbed. Use mechanised machinery when installing posts to eliminate need for foundations. Construct on alternate strips to combat possible erosion. | | ✓ |
| Establish structures on the contour. Use grass strips to regulate flow speed | | ✓ |
| Terrestrial Fauna asnd Avifauna | | |
| All vehicle speeds associated with the project should be monitored and should be limited to 40 km/h (maximum) during the construction and operation phases; | | ✓ |
| Speed humps need to be placed at pre-determined locations to force project vehicles to reduce speed; | | ✓ |
| Road mortalities should be monitored by both vehicle operators (for personal incidents only) and the ECO (all road and fence kill on periodic monitoring basis as well as specific incidents) with trends being monitored and subject to review as part of the monthly reporting. Monitoring should occur via a logbook system where staff takes note of the date, time and location of the sighting/ incident. This will allow determination of the locations where the greatest likelihood exists of causing a road mortality and mitigate against it through both the embedded measures mentioned above (reducing vehicle speeds in sensitive areas) and below (e.g. fauna underpasses, fence removals and seasonal speed reductions). Finally, mitigation should be adaptable to the onsite situation which may vary over time; | | ✓ |
| Reduce direct mortalities either by removing fences in identified sensitive areas or indeed, increasing the buffer area either side of the road by 50 metres either side, in order to allow fauna to have an escape area away from impenetrable fences; | Already mitigated with the design of the preferred layout | |

| | | |
|---|---|---|
| Reduce direct mortalities by allowing for fauna to cross the roads, particularly where the roads cross a sensitive natural habitat (e.g. wetlands or artificial water points). This can be achieved by constructing fauna underpasses under the roads (large culverts or large open-ended concrete pipes laid into the raised roads). These underpasses should be used in conjunction with "fauna barriers" which prevent the most susceptible small fauna from crossing the roads on the surface by directing them towards the underpasses where they can cross under the roads safely. It is important to note that utilization of underpasses is strongly dependent on animal body size (larger culverts are more successful) and the surrounding habitat (Mata et. al 2005); | | ✓ |
| All staff operating motor vehicles must undergo an environmental induction training courses that includes instruction on the need to comply with speed limits, to respect all forms of wildlife (especially reptiles and amphibians) and, wherever possible, prevent accidental road kills of fauna. Dead mammals should never be handled due to the risk of rabies and snakes should only be handled after inductions have taken place due to the risks of post-mortem envenomation. Drivers not complying with speed limits should be subject to penalties | | ✓ |
| Should large holes or burrows be located at the sites, and where avoidance of these areas is not possible, a zoological specialist should be contacted to investigate and possibly remove any species located within them. | | ✓ |
| Equipment with low noise emissions must be used or silencers should be fitted on all engines; | | ✓ |
| A dust monitoring system should be implemented during the construction and operational phase; | ✓ | |
| Reduce exterior lighting to that necessary for safe operation, and implement operational strategies to reduce spill light. Use down-lighting from non-UV lights where possible, as light emitted at one wavelength has a low level of attraction to insects. This will reduce the likelihood of attracting insects and their predators at night; | | ✓ |
| Keep noise levels suppressed as per the local municipality or national standards. Do not unnecessarily disturb faunal species, especially during the breeding season and those with juveniles; | | ✓ |
| A 100 m "no-go" buffer and a 300 m total buffer zone for all ridges must be implemented where activity should not take place if possible in order to protect habitat but also to allow for minimal direct impacts of birds with solar infrastructure; | Already mitigated with the design of the preferred layout | |
| All staff should be subjected to an induction training program where appropriate conservation principles, safety procedures, snake bite avoidance and first aid treatment are taught. Several staff members should complete a snake handling course in order to safely remove snakes from construction areas. | | ✓ |
| Disturbance of surrounding natural areas should be avoided and the spread of alien flora into natural areas should be controlled. | | ✓ |
| Continuous monitoring of the growth and spread of alien flora coupled with an adaptive management approach to identify suitable control mechanisms. No chemical control should take place in close proximity of watercourses unless authorised by the competent authority | | ✓ |
| An Alien and Invasive species eradication action plan should be compiled, in order to ensure that the spread and establishment of Alien and Invasive species are controlled and that disturbances are minimal and mitigated where necessary. | | ✓ |
| Vegetation clearing should be done for as short a time as possible. Erosion control methods during the construction phase should be implemented to limit erosion where applicable. | | ✓ |
| Revegetation in natural areas after clearance should commence directly where natural areas have been disturbed unnecessarily; | | ✓ |
| Heavy vehicles should preferably not operate in the wet season as gravel roads can be disturbed and lead to erosion if not managed. | | ✓ |
| Social | | |
| Where reasonable and practical, the proponent should appoint local contractors and implement a 'locals first' policy, especially for semi and low-skilled job categories. However, due to the low skills levels in the area, the majority of skilled posts are likely to be filled by people from outside the area. | | ✓ |
| Before the construction phase commences the proponent should meet with representatives from the KGLM to establish the existence of a skills database for the area. If such as database exists it should be made available to the contractors appointed for the construction phase. | | ✓ |
| Where feasible, efforts should be made to employ local contactors that are compliant with Broad Based Black Economic Empowerment (BBBEE) criteria; | | ✓ |

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| The local authorities, community representatives, and organisations on the interested and affected party database should be informed of the final decision regarding the project and the potential job opportunities for locals and the employment procedures that the proponent intends following for the construction phase of the project. | | ✓ |
| Where feasible, training and skills development programmes for locals should be initiated prior to the initiation of the construction phase | | ✓ |
| The recruitment selection process should seek to promote gender equality and the employment of women wherever possible. | | ✓ |
| The KGLM, in conjunction with the local business sector and representatives from the local hospitality industry, should identify strategies aimed at maximising the potential benefits associated with the project. | | ✓ |
| Where possible, the proponent should make it a requirement for contractors to implement a 'locals first' policy for construction jobs, specifically for semi and low-skilled job categories; | | ✓ |
| The proponent should consider the option of establishing a Monitoring Forum (MF) in order to monitor the construction phase and the implementation of the recommended mitigation measures. The MF should be established before the construction phase commences, and should include key stakeholders, including representatives from local communities, local KGLM Councillor for Ward 8, farmers and the contractor(s). The MF should also be briefed on the potential risks to the local community associated with construction workers; | | ✓ |
| The proponent and the contractor(s) should, in consultation with representatives from the MF, develop a code of conduct for the construction phase. The code should identify which types of behaviour and activities are not acceptable. Construction workers in breach of the code should be dismissed. All dismissals must comply with the South African labour legislation; | | ✓ |
| The proponent and the contractor should implement an HIV/AIDS awareness programme for all construction workers at the outset of the construction phase; | | ✓ |
| The construction area should be fenced off before construction commences and no workers should be permitted to leave the fenced off area; | | ✓ |
| The contractor should provide transport for workers to and from the site on a daily basis. This will enable the contractor to effectively manage and monitor the movement of construction workers on and off the site. | | ✓ |
| Where necessary, the contractors should make the necessary arrangements to enable low and semi-skilled workers from outside the area to return home over weekends and/ or on a regular basis. This would reduce the risk posed to local family structures and social networks; | | ✓ |
| The contractor must ensure that all construction workers from outside the area are transported back to their place of residence within 2 days for their contract coming to an end; | | ✓ |
| It is recommended that no construction workers, with the exception of security personnel, should be permitted to stay over-night on the site. | ✓ | |
| The proponent should implement a policy that no employment will be available at the gate. | | ✓ |
| The construction area should be fenced off prior to the commencement of the construction phase. The movement of construction workers on the site should be confined to the fenced off area; | ✓ | |
| The proponent must enter into an agreement with the local farmers in the area whereby damages to farm property etc. during the construction phase will be compensated for. The agreement should be signed before the construction phase commences; | | ✓ |
| Traffic and activities should be strictly contained within designated areas | | ✓ |
| Strict traffic speed limits must be enforced on the farm | | ✓ |
| All farm gates must be closed after passing through | | ✓ |
| Contractors appointed by the proponent should provide daily transport for low and semi-skilled workers to and from the site. This would reduce the potential risk of trespassing on the remainder of the farm and adjacent properties | | ✓ |
| The proponent should hold contractors liable for compensating farmers and communities in full for any stock losses and/or damage to farm infrastructure that can be linked to construction workers. This should be contained in the Code of Conduct to be signed between the proponent, the contractors and neighbouring landowners. The agreement should also cover losses and costs associated with fires caused by construction workers or construction related activities (see below) | | ✓ |
| The Environmental Management Plan (EMP) must outline procedures for managing and storing waste on site, specifically plastic waste that poses a threat to livestock if ingested | | ✓ |
| Contractors appointed by the proponent must ensure that all workers are informed at the outset of the construction phase of the conditions contained on the Code of Conduct, specifically consequences of stock theft and trespassing on adjacent farms. | | ✓ |

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| Contractors appointed by the proponent must ensure that construction workers who are found guilty of stealing livestock and/or damaging farm infrastructure are dismissed and charged. This should be contained in the Code of Conduct. All dismissals must be in accordance with South African labour legislation | | ✓ |
| The option of establishing a fire-break around the perimeter of the site prior to the commencement of the construction phase should be investigated; | Already mitigated with the design of the preferred layout ³⁴ | |
| Contractor should ensure that open fires on the site for cooking or heating are not allowed except in designated areas; | | ✓ |
| Smoking on site should be confined to designated areas; | | ✓ |
| Contractor should provide adequate fire-fighting equipment on-site, including a fire fighting vehicle; | | ✓ |
| Contractor to provide fire-fighting training to selected construction staff | | ✓ |
| The movement of heavy vehicles associated with the construction phase should be timed to avoid times of the week, such as weekends, when the volume of traffic travelling along the N14 may be higher; | Already mitigated with the design of the preferred layout ³⁵ | |
| The section of access road from the N14 that passes adjacent to the vineyards should be surfaced | ✓ | |
| Dust suppression measures must be implemented on un-surfaced roads, such as wetting on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers. | | ✓ |
| All vehicles must be road-worthy and drivers must be qualified and made aware of the potential road safety issues and need for strict speed limits | | ✓ |
| An Environmental Control Officer (ECO) should be appointed to monitor the establishment phase of the construction phase; | ✓ | |
| All areas disturbed by construction related activities, such as access roads on the site, construction platforms, workshop area etc., should be rehabilitated at the end of the construction phase | | ✓ |
| The implementation of a rehabilitation programme should be included in the terms of reference for the contractor/s appointed | | ✓ |
| The implementation of the Rehabilitation Programme should be monitored by the ECO | | ✓ |
| Implement a skills development and training programme aimed at maximising the number of employment opportunities for local community members; Maximise opportunities for local content, procurement and community shareholding | | ✓ |
| The KGLM should liaise with the proponents of other renewable energy projects in the area to investigate how best the Community Trusts can be established and managed so as to promote and support local, socio-economic development in the region as a whole. | | ✓ |
| The KGLM should be consulted as to the structure and identification of potential trustees to sit on the Trust. The key departments in the KGLM that should be consulted include the Municipal Managers Office, IDP Manager and LED Manager | | ✓ |
| Clear criteria for identifying and funding community projects and initiatives in the area should be identified. The criteria should be aimed at maximising the benefits for the community as a whole and not individuals within the community; | | ✓ |
| Strict financial management controls, including annual audits, should be instituted to manage the funds generated for the Community Trust from the SEF plant. | | ✓ |
| The proponent should ensure that retrenchment packages are provided for all staff retrenched when the plant is decommissioned. | | ✓ |
| All structures and infrastructure associated with the proposed facility should be dismantled and transported off-site on decommissioning | | ✓ |
| Revenue generated from the sale of scrap metal during decommissioning should be allocated to funding closure and rehabilitation of disturbed areas. | | ✓ |

³⁴ The perimeter road around the facility also serves as a firebreak.

³⁵ Refer to Traffic Management Plan

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| The Northern Cape Provincial Government, in consultation with the ZFMDM, KGLM and the proponents involved in the development of renewable energy projects in the GKLM, should consider establishing a Development Forum to co-ordinate and manage the development and operation of renewable energy projects in the area with the specific aim of mitigating potential negative impacts and enhancing opportunities. This would include identifying key needs, including capacity of existing services, accommodation and housing and the implementation of an accredited training and skills development programmes aimed at maximising the opportunities for local workers to be employed during the construction and operational phases of the various proposed projects. These issues should be addressed in the Integrated Development Planning process undertaken by the KGLM and ZFMDM. | | ✓ |
| Freshwater Ecology | | |
| No infrastructure (e.g. H beams) to be planned in any watercourse to avoid erosion as well as potential damage to infrastructure during surface flooding. Infrastructure may however straddle the minor low sensitivity watercourses. | | ✓ |
| Limit infrastructure (includes roads and torque tubes) crossing watercourses to the absolute minimum and in low sensitivity features only. This interrupts longitudinal connectivity and could cause collisions with fauna utilizing the riparian zone | | ✓ |
| Limited development may be planned in buffer zones of low sensitivity watercourses | | ✓ |
| Buffer zones for pans and the pans themselves are no-go zones | Already mitigated with the design of the preferred layout | |
| Minimise alteration to existing drainage networks as far as possible, avoiding leveling or infilling as this will alter flow paths and cause erosion; | | ✓ |
| Rainwater collection tanks should be installed on building roofs in order to reduce the risk of channeled flows from gutters, and store water for a variety of uses (e.g. dust suppression and PV panel washing) | | ✓ |
| Consider the use of materials for parking areas that allow greater water infiltration rates such as gravel | | ✓ |
| Considering the beneficial effects of vegetation in terms of intercepting rainwater | | ✓ |
| Minimize the disturbance of vegetative cover underneath the PV panels; | | ✓ |
| Should stormwater need to be discharged into a drainage line from any surface, methods of energy dissipation such as stilling basins should be employed to reduce flow velocities entering the watercourse | | ✓ |
| Only slash or trim vegetation where it is absolutely necessary | | ✓ |
| Clear vegetation outside of major bird breeding seasons | | ✓ |
| Temporarily fence no-go and sensitive areas along their buffers with single-strand wire fencing, not danger tape. The aim is to exclude easy access by people and vehicles, but still allow the movement of fauna; | | ✓ |
| Where vehicle access and work within a watercourse is unavoidable, such as the construction of a road crossing, then demarcate the access, parking and lay down areas using temporary fencing | | ✓ |
| Where excessive damage has occurred to the watercourse bed, banks or riparian zone, this must be rehabilitated immediately under the guidance of an aquatic specialist. | | ✓ |
| Limit disturbance to soil and vegetation as far as possible to reduce the risk of erosion. | | ✓ |
| Establish sediment traps (e.g. silt fences or erosion berms) on areas prone to erosion. Although rainfall is an unlikely event, it must be planned for. Allowance must be made to clear sediment from the traps if erosion occurs during the construction period. | | ✓ |
| If active erosion results in the formation of gullies, these areas must be infilled with topsoil and covered with hessian or a geotextile (e.g. hessian sheets or geotextiles) prior to revegetation. | | ✓ |
| Where sedimentation downstream occurs as a direct result of construction activities this must be assessed and manual removal (using spades) under the supervision of a freshwater ecologist or environmental site officer may be recommended. | | ✓ |
| Vehicle parking and refuelling areas must be located > 50m from the edge of watercourses, and be clearly defined | | ✓ |
| No refuelling or vehicle maintenance should take place within 500 m of a watercourse. | | ✓ |
| Any fuel storage areas must be bunded to prevent spills from spreading if they occur. Waste collection and removal must be arranged on a regular basis, and allowance must be made for conducting a litter clean-up for up to 100m downstream and upstream of the watercourses at the development site. | | ✓ |

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| A botanical specialist should be consulted prior to imports of foreign soil or fill material to the site to ensure they do not pose a risk and do not originate from areas with high levels of alien invasion. | | ✓ |
| Alien plants must be continually removed from disturbed areas throughout the construction period. Any uncertainty about plant identification must be clarified with a botanical specialist | | ✓ |
| When conducting inspections of any infrastructure on site, include a checklist of likely alien plants to check for throughout the site; | | ✓ |
| Staff at the plant must be educated and made aware of alien vegetation that could be present and that must be eradicated; | | ✓ |
| Depending on the species that establish, it is essential that recommended methods of control be employed and adequate stores of herbicide/tools are kept on site for this purpose. Alternatively a reputable contractor can be used for ongoing control of aliens | | ✓ |
| Alien plant control requires ongoing control and commitment. Therefore, alien plant management must form an integral part of the plant's Environmental Management Plan. | | ✓ |
| Retain natural vegetation intact as far as possible as this acts as a dust suppressant; | | ✓ |
| Wash panels only when required in order to conserve water; | | ✓ |
| Avoid the use of detergents, but if required select environmentally friendly options. | | ✓ |
| If spills occur (e.g. oil or hydraulic fluid) there must be a procedure for the containment and management thereof; | | ✓ |
| Any waste construction materials must be disposed of responsibly, such as at the local landfill site; | | ✓ |
| Human waste should be stored in septic tanks kept well away from any watercourses; | | ✓ |
| A reliable contractor must be appointed for the removal of refuse from the plant; | | ✓ |
| General refuse must be contained in animal-proof bins. | | ✓ |
| Visual | | |
| Light spillage reduction management should be implemented | | ✓ |
| Dust management during the lifetime of the project. | | ✓ |
| The laydown area should be sited away from the N14 road as well as the viticulture areas, and preferably not located on portions of the site that have local prominence | | ✓ |
| Dust management during the lifetime of the project. | | ✓ |
| Careful management of long-term impacts where the route passes over shallow drainage lines. | | ✓ |
| Adopt responsible construction practices aimed at containing the construction activities to specifically demarcated areas thereby limiting the removal of natural vegetation to the minimum. | | ✓ |
| Limit access to the construction site to existing access roads. | | ✓ |
| Rehabilitate all disturbed areas to acceptable visual standards as soon as possible after construction is complete in each area. | | ✓ |
| Construction should not take place at night-time. | | ✓ |
| The laydown area should be sited away from the N14 road and preferably not located on areas that are prominent. | | ✓ |
| Topsoil from the footprints of the road and structures should be stockpiled for rehabilitation and restoration purposes. | | ✓ |
| If very dry conditions prevail and dust becomes a nuisance, water should be sprayed on the road surface (or implement another suitable mitigation to reduce wind-blown dust). | | ✓ |
| Strict litter control. | | ✓ |
| Temporary roads should be well marked and should only cross drainage lines on areas identified as permanent road features where erosion and soil loss management can be contained. | | ✓ |
| Signage on the N14 should be moderated | | ✓ |
| All buildings should be painted a grey-brown colour. | | ✓ |
| Fencing should be simple, diamond shaped (to catch wind-blown litter) and be transparent in appearance. The fences should be checked on a monthly basis for the collection of litter caught on the fence. | | ✓ |
| Palaeontology | | |

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| Should any substantial fossil remains (e.g. mammalian bones and teeth) be encountered during construction, however, these should be safeguarded, preferably <i>in situ</i> , and reported by the ECO to SAHRA, i.e. The South African Heritage Resources Authority, as soon as possible (Contact details: SAHRA. 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Phone: +27 (0)21 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). This so that appropriate action can be taken by a professional palaeontologist, at the developer's expense. Mitigation would normally involve the scientific recording and judicious sampling or collection of fossil material as well as associated geological data (e.g. stratigraphy, sedimentology, taphonomy) by a professional palaeontologist. | ✓ | |
| A Chance Fossil Finds Procedure must form part of the EMPr | | ✓ |
| Botanical | | |
| Undertake preconstruction walk-through of the facility in order to locate species of conservation concern that can be translocated (such as aloes) as well as comply with the Northern Cape Nature Conservation Act and DENC/DAFF permit conditions. | | ✓ |
| Vegetation clearing to commence only after walk through has been conducted and necessary permits obtained. | | ✓ |
| Preconstruction environmental induction for all construction staff on site to ensure that basic environmental principles are adhered to. This includes awareness of no littering, appropriate handling of pollution and chemical spills, avoiding fire hazards, minimizing wildlife interactions, remaining within demarcated construction areas etc. | | ✓ |
| Environmental Control Officer (ECO) to provide supervision and oversight of vegetation clearing activities within sensitive areas such as near high density <i>Acacia erioloba</i> . | | ✓ |
| Vegetation clearing to be kept to a minimum. No unnecessary vegetation to be cleared. | | ✓ |
| All construction vehicles should adhere to clearly defined and demarcated roads. No off-road driving to be allowed outside of the construction area. | | ✓ |
| Archaeology | | |
| Archaeological resources identified for protection must be permanently fenced | | ✓ |
| In the event that excavations and earthmoving activities expose significant archaeological or heritage resources, such activities must stop and SAHRA must be notified immediately. | | ✓ |
| If exposed during development, archaeological resources must be dealt with in accordance with the National Heritage Resources Act (No. 25 of 1999) and at the expense of the developer. | ✓ | |
| In the event of exposing human remains during construction, the matter will fall into the domain of the South African Heritage Resources Agency and will require a professional archaeologist to undertake mitigation if needed. Such work will also be at the expense of the developer | ✓ | |

8. PUBLIC PARTICIPATION PROCESS

Section 41 in Chapter 6 of regulation 982 details the public participation process that has to take place as part of an environmental process. The table below provides a quick reference to show how this environmental process has or intends to comply with these legislated requirements relating to public participation.

Please refer to **Appendix F**, where all evidence of public participation is included.

Table 47: Public participation requirements in terms of S41 of R982

| Regulated Requirement | Description |
|---|---|
| (1) If the proponent is not the owner or person in control of the land on which the activity is to be undertaken, the proponent must, before applying for an environmental authorisation in respect of such activity, obtain the written consent of the landowner or person in control of the land to undertake such activity on that land. | Proof of landowner consent for Bloemsmond 4 is attached in Annexure G2 . |
| (2) Subregulation (1) does not apply in respect of- | The access road is deemed to constitute a linear activity and as such not required to obtain landowner consent. |
| (a) linear activities; | Land owners of the portion where the access road crosses were interviewed by the social specialist and where also given an opportunity to comment on the Draft BAR. |

| Regulated Requirement | Description |
|---|---|
| The person conducting a public participation process must take into account any relevant guidelines applicable to public participation as contemplated in section 24J of the Act and must give notice to all potential interested and affected parties of an application or proposed application which is subjected to public participation by - | |
| (a) fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of - (i) the site where the activity to which the application or proposed application relates is or is to be undertaken; and (ii) any alternative site; | A site notice was placed at two positions along the N14. Photographic evidence of these notices is attached in Annexure F3 . |
| (b) giving written notice, in any of the manners provided for in section 47D of the Act, to - | |
| (i) the occupiers of the site and, if the proponent or applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken; | There are no tenants on the affected portions, other than the landowner.. |
| (ii) owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken; | Owners of adjacent properties have been notified of this environmental process. Such owners have been requested to inform the occupiers of the land of this environmental process. Please refer to Annexure F4 for copies of these notifications |
| (iii) the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area; | The ward councillor has been notified of this environmental process. Please refer to Annexure F4 for copies of these notifications |
| (iv) the municipality which has jurisdiction in the area; | The Kai !Garib municipality (Planning and Technical Services) have been notified of this environmental process. Please refer to Annexure F4 for copies of these notifications. |
| (v) any organ of state having jurisdiction in respect of any aspect of the activity; and | Please refer to section Annexure F1 showing the list of organs of state that were notified as part of this environmental process. Please refer to Annexure F4 for copies of these notifications. |
| (vi) any other party as required by the competent authority; | DEA were given an opportunity to comment on the Draft BAR and EMPr. |
| (c) placing an advertisement in - (i) one local newspaper; or (ii) any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations; | An advert calling for registration of I&APs was placed in Die Gembok local newspaper. Please refer to Annexure F3 for a copy of this advertisement. There is currently no official Gazette that has been published specifically for the purpose of providing public notice of applications |
| (d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken: Provided that this paragraph need not be complied with if an advertisement has been placed in an official Gazette referred to in paragraph (c)(ii);and | Adverts were not placed in provincial or national newspapers, as the potential impacts will not extend beyond the borders of the municipal area. |
| (e) using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to | Notifications have included provision for alternative engagement in the event of illiteracy, disability or any other disadvantage. In such instances, Cape EAPrac will engage |

| Regulated Requirement | Description |
|---|--|
| <p>-</p> <p>(i) illiteracy;</p> <p>(ii) disability; or</p> <p>(iii) any other disadvantage.</p> | <p>with such individuals in such a manner as agreed on with the competent authority.</p> |
| <p>(3) A notice, notice board or advertisement referred to in subregulation (2) must -</p> <p>(a) give details of the application or proposed application which is subjected to public participation; and</p> <p>(b) state -</p> <p>(i) whether basic assessment or S&EIR procedures are being applied to the application;</p> <p>(ii) the nature and location of the activity to which the application relates;</p> <p>(iii) where further information on the application or proposed application can be obtained; and</p> <p>(iv) the manner in which and the person to whom representations in respect of the application or proposed application may be made.</p> | <p>Please refer to Annexure F3.</p> |
| <p>(4) A notice board referred to in subregulation (2) must -</p> <p>(a) be of a size at least 60cm by 42cm; and</p> <p>(b) display the required information in lettering and in a format as may be determined by the competent authority.</p> | <p>Please refer to Annexure F3.</p> |
| <p>(5) Where public participation is conducted in terms of this regulation for an application or proposed application, subregulation (2)(a), (b), (c) and (d) need not be complied with again during the additional public participation process contemplated in regulations 19(1)(b) or 23(1)(b) or the public participation process contemplated in regulation 21(2)(d), on condition that -</p> <p>(a) such process has been preceded by a public participation process which included compliance with subregulation (2)(a), (b), (c) and (d); and</p> <p>(b) written notice is given to registered interested and affected parties regarding where the -</p> <p>(i) revised basic assessment report or, EMPr or closure plan, as contemplated in regulation 19(1)(b);</p> <p>(ii) revised environmental impact report or EMPr as contemplated in regulation 23(1)(b); or</p> <p>(iii) environmental impact report and EMPr as contemplated in regulation 21(2)(d);</p> <p>may be obtained, the manner in which and the person to whom representations on these reports or plans may be made and the date on which such representations are due.</p> | <p>This will be complied with if final reports are produced later on in the environmental process.</p> |
| <p>(6) When complying with this regulation, the person conducting the public participation process must ensure that -</p> <p>(a) information containing all relevant facts in respect of the</p> | <p>All reports that are submitted to the competent authority will be subject to a public participation process. These include:</p> <ul style="list-style-type: none"> - Draft BAR - Draft EMPr |

| Regulated Requirement | Description |
|---|---|
| <p>application or proposed application is made available to potential interested and affected parties; and</p> <p>(b) participation by potential or registered interested and affected parties is facilitated in such a manner that all potential or registered interested and affected parties are provided with a reasonable opportunity to comment on the application or proposed application.</p> <p>(7) Where an environmental authorisation is required in terms of these Regulations and an authorisation, permit or licence is required in terms of a specific environmental management Act, the public participation process contemplated in this Chapter may be combined with any public participation processes prescribed in terms of a specific environmental management Act, on condition that all relevant authorities agree to such combination of processes.</p> | <p>- All specialist reports that form part of this environmental process.</p> |

8.1 REGISTRATION OF KEY STAKEHOLDERS

A number of key stakeholders were automatically registered and were given an opportunity to comment on the Draft BAR. Copies and proof of these notifications are included in **Annexure F4**. A list of key stakeholders registered for this process included in the table below.

Table 48: Key Stakeholders automatically registered as part of the Environmental Process

| Stakeholders Registered | | |
|---|---|--|
| Neighbouring property owners | Department of Environmental Affairs and Nature Conservation | Department of Water and Sanitation |
| All parties registered as having prospecting rights on the farm | Kai !Garib Municipality: Municipal Manager | Department of Science and Technology |
| Joe Morolong: Ward 4 Councillor | South African National Roads Agency Limited | The Council for Scientific and Industrial Research |
| South African Heritage Resources Agency | Department of Transport and Public Works | The South African Square Kilometre Array |
| Northern Cape Heritage Resources Authority | Department of Health | The South African Civil Aviation Authority |
| Department of Agriculture, Forestry and Fisheries | Department of Minerals and Energy | Affected Land Owner |
| Provincial Department of Agriculture | Eskom | Department of Communications |
| Endangered Wildlife Trust. | Department of Mineral Resources | SENTECH |
| Department of Environmental Affairs, Biodiversity Directorate. | Birdlife Africa. | |

8.2 AVAILABILITY OF DRAFT BASIC ASSESSMENT REPORT

The availability of the Draft Basic Assessment was advertised in press, all registered interested and affected parties were notified of the availability of the report, as were all I&APs that had previously registered and/or participated in the previous EIA process for AEP Bloemsmond 1 and AEP Bloemsmond 2. All state departments, organs of state and key stakeholders were provided with their own copies of the Draft BAR (digital copies on CD). Electronic copies of the Draft BAR were available on the Cape EAPrac Website and Hardcopies were available at the Keimoes Library. A comment period of 30 days extending from 07 August 2019 to 09 September 2019 was provided.

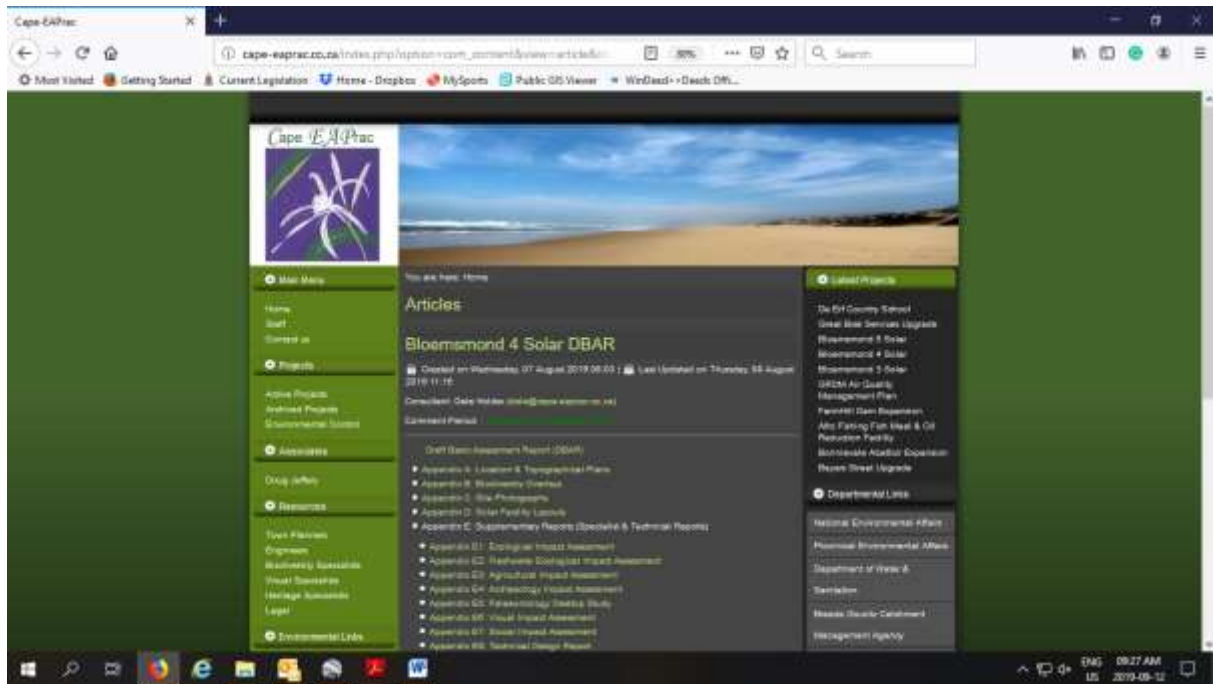


Figure 28: Screen Shot of Draft Basic Assessment Report as available on the Cape EAPrac website.

Please refer to appendix F5 for all details relating to the availability of the Draft Basic Assessment Report.

8.3 COMMENTS AND RESPONSES

Please refer to appendix F2 for all comments received as well as the responses thereto. During the comment period, comments were received from the following parties:

- Eskom;
- Open Serve (agent of Telkom SA)
- SKA-SA;
- Kai Garib Local Municipality
- SANRAL (draft correspondences – Final comment still outstanding at the time of publishing)
- Digital acknowledgements of applications from SAHRA and DWS.

9. CONCLUSION AND RECOMMENDATIONS

This environmental process is currently being undertaken to present proposals to the public and potential I&APs and to identify and assess environmental impacts, issues and concerns raised as a result of the proposed development alternatives.

Cape EAPrac is of the opinion that the information contained in this Basic Assessment Report and the documentation attached hereto is sufficient to allow the I&APs to apply their minds to the potential negative and/or positive impacts associated with the development, in respect of the activities applied for. This environmental process has not identified any fatal flaws with the proposal and as such it is our reasoned view that the project should proceed to the next phase of the environmental process. All specialists concur that the development as proposed (Layout Alternative 1 and Eastern Access Road Alternative) can be considered for approval and that there are no reasons why the development should not be implemented. All impacts range from high positive to medium negative and all high and medium - high negative impacts have been avoided by the risk adverse approach to the development of this facility.

All stakeholders were requested to review this Draft BAR and the associated appendices, and provide comment, or raise issues of concern, directly to *Cape EAPrac* within the specified 30-day comment period. All comments received during this comment period have been included in the Final BAR submitted to DEA for decision making.

It is the recommendation of this office that the development proposal, Layout Alternative 1 and Eastern Access Road Alternative be considered for approval by the competent Authority on condition that all other legislative approvals be obtained, and that the final EMPr be adhered to.

9.1 REMAINDER OF ENVIRONMENTAL PROCESS

The following process is to be followed for the remainder of the environmental process:

- The Final BAR is herewith submitted to the DEA for consideration and decision-making;
- The DEA's decision (Environmental Authorisation) and the appeal process on the Final BAR will be communicated with all registered I&APs.

10. ABBREVIATIONS

| | |
|-----------|--|
| AIA | Archaeological Impact Assessment |
| BGIS LUDS | Biodiversity Geographic Information System Land Use Decision Support |
| CBA | Critical Biodiversity Area |
| CDSM | Chief Directorate Surveys and Mapping |
| CEMPr | Construction Environmental Management Programme |
| DEA | Department of Environmental Affairs |
| DEA&NC | Department of Environmental Affairs and Nature Conservation |
| DME | Department of Minerals and Energy |
| DSR | Draft Scoping Report |
| EAP | Environmental Impact Practitioner |
| EHS | Environmental, Health & Safety |
| EIA | Environmental Impact Assessment |
| EIR | Environmental Impact Report |
| EMPr | Environmental Management Programme |
| ESA | Ecological Support Area |
| GPS | Global Positioning System |
| GWh | Giga Watt hour |
| HIA | Heritage Impact Assessment |
| I&APs | Interested and Affected Parties |
| IDP | Integrated Development Plan |
| IFC | International Finance Corporation |
| IPP | Independent Power Producer |
| kV | Kilo Volt |
| LUDS | Land Use Decision Support |
| LUPO | Land Use Planning Ordinance |
| MW | Mega Watt |

| | |
|-------------|---|
| NEMA | National Environmental Management Act |
| NEMBA | National Environmental Management: Biodiversity Act |
| NERSA | National Energy Regulator of South Africa |
| NHRA | National Heritage Resources Act |
| NPAES | National Protected Area Expansion Strategy |
| NSBA | National Spatial Biodiversity Assessment |
| NWA | National Water Act |
| PM | Post Meridiem; "Afternoon" |
| PSDF | Provincial Spatial Development Framework |
| REIPPPP | Renewable Energy Independent Power Producer Procurement Programme |
| S.A. | South Africa |
| SACAA / CAA | South African Civil Aviation Authority |
| SAHRA | South African National Heritage Resources Agency |
| SANBI | South Africa National Biodiversity Institute |
| SANS | South Africa National Standards |
| SDF | Spatial Development Framework |
| TOPS | Threatened and Protected Species |

11. REFERENCES

³⁶DEA (2010). National Climate Change Response Green Paper 2010.

DEA (January 2008). *National Response to South Africa's Electricity Shortage*. Interventions to address electricity shortages.

DEA&DP (2003). *Waste Minimisation Guideline for Environmental Impact Assessment reviews*. NEMA EIA Regulations Guideline & Information Series, Department Environmental Affairs & Development Planning.

DEA&DP (2005). *Guideline for the review of specialist input in the EIA process*. NEMA EIA Regulations Guideline & Information Document Series, Department of Environmental Affairs & Development Planning.

DEA&DP (2005). *Guideline for involving biodiversity specialists in the EIA process*. NEMA EIA Regulations Guideline & Information Document Series, Department of Environmental Affairs & Development Planning.

DEA&DP (2005). *Guideline for environmental management plans*. NEMA EIA Regulations Guideline & Information Document Series, Department of Environmental Affairs & Development Planning.

DEA&DP (2005). *Provincial urban edge guideline*. Department Environmental Affairs & Development Planning.

DEA&DP (2006). *Guideline on the Interpretation of the Listed Activities*. NEMA EIA Regulations Guidelines & Information Document Series, Department of Environmental Affairs & Development Planning.

DEA&DP (2007). *Guide on Alternatives*, NEMA EIA Regulations Guidelines & Information Document Series, Department of Environmental Affairs & Development Planning.

DEA&DP (2007). *Guideline on Appeals*, NEMA EIA Regulations Guidelines & Information Document Series, Department of Environmental Affairs & Development Planning.

DEA&DP (2007). *Guideline on Exemption Applications*. NEMA EIA Regulations Guidelines & Information Document Series, Department of Environmental Affairs & Development Planning.

DEA&DP (2007). *Guideline on Public Participation*. NEMA EIA Regulations Guidelines & Information Document Series, Department of Environmental Affairs & Development Planning.

DEA&DP (2009). *Guideline on Need & Desirability*, NEMA EIA Regulations Guideline and Information Document Series, Department Environmental Affairs & Development Planning.

DEA&DP (2009). *Guideline on Alternatives*, NEMA EIA Regulations Guideline and Information Document Series, Department Environmental Affairs & Development Planning.

DEA&DP (2009). *Guideline on Transitional Arrangements*, NEMA EIA Regulations Guideline and Information Document Series, Department Environmental Affairs & Development Planning.

DEA&DP (2009). *Guideline on Exemption Applications*. NEMA EIA Regulations Guideline and Information Document Series, Department Environmental Affairs & Development Planning.

DEA&DP (2009). *Guideline on Appeals*. NEMA EIA Regulations Guideline and Information Document Series, Department Environmental Affairs & Development Planning.

³⁶ This reference list excludes specialist studies that form part of this environmental process and which are contained in Annexure E1 – E12

DEA&DP (2009). *Guideline on Public Participation*. NEMA EIA Regulations Guideline and Information Document Series, Department Environmental Affairs & Development Planning.

DEA&DP. (May 2006). *Strategic Initiative to Introduce Commercial Land Based Wind Energy Development to the Western Cape: Specialist Study: Executive Summary - CNdV Africa* prepared for Provincial Government of the Western Cape.

Department of Mineral & Energy (1998). White Paper on Energy Policy of the Republic of South Africa.

Department of Mineral & Energy (2003). *The White Paper on Renewable Energy*.

DEAT (2002). Integrated Environmental Management Information Series 3: *Stakeholder Engagement*. Department of Environmental Affairs and Tourism, Pretoria.

DEAT (2004). *Criteria for determining alternatives in EIAs*, Integrated Environmental Management, Information Series 11, Department of Environmental Affairs & Tourism, Pretoria.

DEAT (2004). *Environmental Management Plans*, Integrated Environmental management, Information Series 12, Department Environmental Affairs & Tourism.

DEAT (2005). *Assessment of Impacts and Alternatives*, Integrated Environmental Management Guideline Series, Department of Environmental Affairs & Tourism, Pretoria.

DEAT (2005). Guideline 4: *Public Participation*, in terms of the EIA Regulations 2005, Integrated Environmental Management Guideline Series, Department of Environmental Affairs and Tourism, Pretoria.

DEAT (2006). *EIA Regulations* in terms of the National Environmental Management Act (Act No 107 of 1998) (Government Notice No R 385, R 386 and R 387 in Government Gazette No 28753 of 21 April 2006).

DWA (2001). *Generic public participation guideline*. Department of Water Affairs and Forestry.

Hsai-Yang, F (Ed)(2006). *Environmental Geotechnology Dictionary* (online version). University of North Caroline, Charlotte, USA.

Integrated Resource Plan for Electricity (Oct. 2010). Revision 2, Version8.

International Finance Corporation – World Bank Group. (April 2007). Environmental, Health and Safety Guidelines for Electric Power Transmission and Distribution.

International Finance Corporation – World Bank Group. (April 2007). *Environmental, Health and Safety Guidelines for Wind Energy*.

International Finance Corporation – World Bank Group. (April 2007). *General Environmental, Health and Safety Guidelines*.

Keatimilwe K & Ashton PJ 2005. *Guideline for the review of specialist input in EIA processes*. Department Environmental Affairs & Development Planning.

Lochner P (2005). *Guideline for Environmental Management Plans*. Department Environmental Affairs & Development Planning.

Lower Orange River Transfrontier Conservation Area Planning: Background Information Document (August 2007). Retrieved on 29 March 2012 from:

www.dwaf.gov.za/Documents/Other/RMP/LOR/LORRMPBIDAUG07.pdf

Mucina, L. & Rutherford, M.C. (eds) 2006. *The Vegetation of South Africa, Lesotho and Swaziland. Strelitzia 19*. South African National Biodiversity Institute, Pretoria.

Münster, F. (2005). *Guidelines for Determining the Scope of Specialist Involvement in EIA Processes: Edition 1*. CSIR Report No ENV-S-C 2005 053 A. Republic of South Africa, Provincial Government of the Western Cape, Department of Environmental Affairs and Development Planning, Cape Town.

Oberholzer B (2005). *Guideline for involving visual & aesthetic specialists*. Department Environmental Affairs & Development Planning.

National Energy Regulator of South Africa (NERSA)(Feb.2010). Rules on selection criteria for renewable energy projects under the REFIT Programme.

National Protected Area Expansion Strategy for S.A. 2008: Priorities for expanding the protected area network for ecological sustainability and climate change adaptation. Government of South Africa, Pretoria, 2010. ISBN 978-1-919976-55-6.

Northern Cape Business online. Retrieved from: <http://www.northerncapebusiness.co.za> on 27 March 2012.

Northern Cape Business online. *Solar Power.* Retrieved from: http://www.northerncapebusiness.co.za/special_features/941417.htm on 27 March 2012.

Saayman, I. (2005). *Guideline for Involving Hydrogeologists in EIA Processes: Edition 1*. CSIR Report No ENV-S-C 2005 053 D. Republic of South Africa, Provincial Government of the Western Cape, Department of Environmental Affairs and Development Planning, Cape Town.

SANBI Biodiversity GIS (2007). South African National Biodiversity Institute, Cape Town, South Africa.

Winter S & Beaumann N (2005). *Guideline for involving heritage specialists in EIA processes*. Department Environmental Affairs & Development Planning.