

SCOPING REPORT

Draft – 20 January 2023

**THE PROPOSED LUCKHOFF SOLAR 3
PHOTOVOLTAIC SOLAR ENERGY
FACILITY NEAR LUCKHOFF, FREE STATE
PROVINCE**



ENVIRONAMICS

PROJECT DETAIL

DFFE Reference No.	:	To be confirmed
Project Title	:	Proposed Luckhoff Solar 3 Photovoltaic Solar Energy Facility near Luckhoff , Free State Province
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Client	:	Luckhoff Solar 3 (Pty) Ltd
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GLOSSARY OF TERMS AND ACRONYMS

BA	Basic Assessment
BAR	Basic Assessment Report
CEA	Cumulative Effects Assessment
DFFE	Department of Forestry, Fisheries and the Environment
DM	District Municipality
DMRE	Department of Mineral Resources and Energy
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
EP	Equator Principles
EPFI	Equator Principles Financial Institutions
Environmental impact	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects.
GNR	Government Notice Regulation
I&AP	Interested and affected party
IDP	Integrated Development Plan
IFC	International Finance Corporation
IPP	Independent Power Producer
IRP	Integrated Resource Plan
kV	Kilo Volt
LM	Local Municipality
Mitigate	Activities designed to compensate for unavoidable environmental damage.
MW	Megawatt
NEMA	National Environmental Management Act No. 107 of 1998
NERSA	National Energy Regulator of South Africa
NWA	National Water Act No. 36 of 1998
PAOI	Project Area of Influence
PPP	Public Participation Process

PV	Photovoltaic
QDS	Quarter Degree Square
REIPPP	Renewable Energy IPP Procurement Process
SAHRA	South African Heritage Resources Agency
SDF	Spatial Development Framework
SPP	Solar Power Plant
VU	Vegetation Unit

CONTEXT FOR THE DEVELOPMENT

According to Eskom, the demand for electricity in South Africa has been growing at approximately 3% per annum. This growing demand, fueled by increasing economic growth and social development, is placing increasing pressure on South Africa's existing power generation capacity. Coupled with this, is the growing awareness of environmentally responsible development, the impacts of climate change and the need for sustainable development. The use of renewable energy technologies, as one of a mix of technologies needed to meet future energy consumption requirements is being investigated as part of the national Department of Mineral Resources and Energy's (DMRE) (previously referred to as the Department of Energy) long-term strategic planning and research process.

The primary rationale for the proposed solar photovoltaic (PV) facility is to add new generation capacity from renewable energy to the national electricity mix and to aid in achieving the goal of 42% share of all new installed generating capacity being derived from renewable energy forms, as targeted by DMRE (Integrated Resource Plan Update 2010-2030). The IRP also identifies the preferred generation technologies required to meet the expected demand growth up to 2030 and incorporates government objectives including affordable electricity, reduced greenhouse gas (GHG) emissions, reduced water consumption, diversified electricity generation sources and localisation and regional development. In terms of the Integrated Resource Plan Update (2019 IRP Update, 2010-2030), over the short term (of the next two or three years), clear guidelines arose; namely to continue with the current renewable bid programme with additional annual rounds of 1000 MW PV, with approximately 8.4GW of the renewable energy capacity planned to be installed from PV technologies over the next twenty years.

The proposed project is intended to form part of the Department of Mineral Resources and Energy's (DMREs) Renewable Energy Independent Power Producer Procurement (REIPPP) Programme or any other programmes/opportunities to generate power in South Africa. The REIPPP Programme aims to secure 14 725 Megawatts (MW) of new generation capacity from renewable energy sources, while simultaneously diversifying South Africa's electricity mix. According to the 2021 State of the Nation Address, Government will soon be initiating the procurement of an additional 11 800 MW of power from renewable energy, natural gas, battery storage and coal in line with the Integrated Resource Plan 2019 and fulfilling their commitments under the United Nations Framework Convention on Climate Change and its Paris Agreement which include the reduction of greenhouse gas emissions. Eskom, our largest greenhouse gas emitter, has committed in principle to net zero emission by 2050 and to increase its renewable capacity.

In response to the above, Luckhoff Solar 3 (Pty) Ltd is proposing the development of a photovoltaic solar facility and associated infrastructure for the purpose of commercial electricity generation on identified sites located across Farm Vijeboom No. 714, Farm Rorich's Hulp No. 505, Farm Klein Palmietfontein No. 370, and Farm De Dorpsgronden Van Luckhoff No. 577, Registration Division Fauresmith, Free State Province situated within the Letsemeng Local Municipality area of jurisdiction (refer to Figure A for the locality map). The project entails the generation of up to 240 MW electrical power through photovoltaic (PV) technology. The total development footprint of

the project will be approximately 480 hectares (including supporting infrastructure). From a regional site selection perspective, this region is preferred for solar energy development due to its global horizontal irradiation value of around 2118 kwh/m².

EXECUTIVE SUMMARY

Like many other small and developing municipalities in the country, the Letsemeng Local Municipality faces a number of challenges in addressing the needs of sustainable growth and improved quality of life (IDP, 2021). The Letsemeng Local Municipality, IDP (2021/2022), has identified specific issues that require special attention including but not limited to waste collection and illegal dumping; sewer spillage and maintenance; unemployment; roads and infrastructure; public private partnership; growth and investment.

The Letsemeng Local Municipality does not regard the development of an IDP as the only requirement prevailing legislation. Therefore, there are specific reasons why the municipality should prepare the IDP. One of the main reasons is that developmental responsibilities have been prescribed by the Constitution, which is aimed at ensuring quality for the life of the municipality's residents. The responsibility does not only relate to the provision of basic services, but also include job creation as well as the promotion of accountability and eradication of poverty within the municipality (IDO, 2021/22). The IDP considers the economic structure and performance and how the municipality relies heavily on the agricultural sector and the general decline of the sector. It indicates that alternative sectors to the declining sectors of the area needs to be explored, which includes the renewable energy sector.

Luckhoff Solar 3 (Pty) Ltd intends to develop a 240 MW photovoltaic solar facility and associated infrastructure on Farm Vijeboom No. 714, Farm Rorich's Hulp No. 505, Farm Klein Palmietfontein No. 370, and Farm De Dorpsgronden Van Luckhoff No. 577, Registration Division Fauresmith, Free State Province situated within the Letsemeng Local Municipality and Xhariep District Municipality area of jurisdiction. The town of Luckhoff is located approximately 3km south of the proposed development (refer to Figure A and B for the locality and regional map). The total footprint of the project will approximately be 480 hectares (including supporting infrastructure on site). The site was identified as being highly desirable due to its suitable climatic conditions, topography (i.e., in terms of slope), environmental conditions (i.e., low agricultural potential, low ecological sensitivity and archaeology), proximity to a grid connection point (i.e., for the purpose of electricity evacuation), as well as site access via a main road (i.e., to facilitate the movement of machinery, equipment, infrastructure and people during the construction phase).

In terms of the National Environmental Management Act (Act 107 of 1998), with specific reference to Sections 24 and 24D, as read with GNR 324-327, as amended (2017), Environmental Authorisation is required for the Luckhoff Solar 3 PV facility. The following listed activities have been identified with special reference to the proposed development and are listed in the EIA Regulations (as amended):

- Activity 11(i) (GN.R. 327): *"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."*
- Activity 12(ii)(a)(c) (GN.R. 327): *"The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (a) within a watercourse or (c) within 32 meters of a watercourse measured from the edge of a watercourse."*



- Activity 19 (GN.R. 327): *“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.”*
- Activity 24 (ii) (GN.R 327): *“The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters.”*
- Activity 28(ii) (GN.R. 327): *“Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare.”*
- Activity 56 (ii) (GN.R 327): *“ 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...”*
- Activity 1 (GN.R. 325): *“The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more...”*
- Activity 15 (GN.R. 325): *“The clearance of an area of 20 hectares or more of indigenous vegetation...”*
- Activity 4 (b)(i)(ee)(gg) (GN.R 324): *“The development of a road wider than 4 metres with a reserve less than 13,5 metres within (b) the Free State, (i) outside urban areas, (ee) within critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans, (gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve, excluding disturbed areas.”*
- Activity 10 (b)(i)(ee)(gg)(hh) (GN.R 324): *“The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (b) in the Free State, (i) outside urban areas,(ee) critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans (gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve and (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland.”*
- Activity 12 (b)(ii)(iv) (GN.R 324): *“The clearance of an area of 300 square metres or more of indigenous vegetation (b) in the Free State, (ii) within critical biodiversity areas identified in bioregional plans (iv) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland.”*



- Activity 14(ii)(a)(c)(b)(i)(ff)(hh) (GN.R 324): *“The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more, where such development occurs (a) within a watercourse or (c) within 32 metres of a watercourse, measured from the edge of a watercourse, (b) within the Free State, (i) outside urban areas within (ff) critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans (hh) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core area of a biosphere reserve.”*
- Activity 18 (b)(i)(gg)(hh) (GN.R 324): *“The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (b) Free State (i) outside urban areas, within (gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core area of a biosphere reserve and (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland.”*

Activities required for the development of the solar facility which are listed under Listing Notice 1, 2 and 3 (GNR 327, 325 and 324) implies that the development could potentially have an impact on the environment that will require mitigation. Subsequently a ‘thorough assessment process’ is required as described in Regulations 21-24 of the EIA Regulations in order to obtain Environmental Authorisation. Environamics has been appointed as the independent consultant to undertake the Scoping and Environmental Impact Reporting (S&EIR) process on behalf of Luckhoff Solar 3 (Pty) Ltd.

Regulation 21 of the EIA Regulations requires that a scoping report must contain the information set out in Appendix 2 of the Regulations or comply with a protocol or minimum information requirements relevant to the application as identified and gazetted by the Minister in a government notice. Appendix 2 of GNR326 requires that information which is necessary for a proper understanding of the process, informing all preferred alternatives, including location alternatives, the scope of the assessment, and the consultation process undertaken be set out in the scoping report.

The potentially sensitive areas which have been identified through the environmental scoping study are detailed in the chapters to follow. The scoping phase provides a high-level overview of the sensitivity on the Luckhoff solar 3 project site. The detail is based on the desktop review of available baseline information for the project site, as well as the sensitivity data received from specialist studies undertaken during the scoping phase. During the scoping phase, the affected area was investigated in sufficient detail in order to provide reliable insight into the potential for constraining factors on the site. Sensitivity map/s will be provided during the draft EIA phase which must be used as a tool by the developer to avoid any areas flagged to be of higher risk or sensitivity which must in turn inform the development layout for the Luckhoff solar 3 PV facility. The high-level layout provided as a part of this draft scoping phase will be further investigated during the EIA Phase in order to develop an environmentally suitable, reasonable and practical facility layout for the Luckhoff solar 3 PV facility.

Based on the high-level assessments undertaken to inform this scoping process, it has been determined that the proposed development will have a net positive impact for the area and will subsequently ensure the optimal utilisation of resources and land. All negative environmental impacts can be effectively mitigated through the recommended mitigation measures and no residual negative impacts are foreseen. The potentially most significant environmental impacts associated with the development, as identified in this scoping phase, are briefly summarised below.

It must be noted that the Environmental Impact Assessment (EIA) phase of the project will consider the impacts on a more detailed level and provide feedback on the facility layout for the proposed project.

Predicted Impacts during the construction phase:

During the construction phase minor negative impacts are foreseen over the short term. The latter refers to a period of 18-24 months. The potentially most significant impacts relate to habitat destruction caused by clearance of vegetation and socio-economic impacts such as the creation of direct and indirect employment opportunities, economic multiplier effects from the use of local goods and services and temporary increase in traffic disruptions and movement patterns.

Predicted Impacts during the operational phase:

During the operational phase the site will serve as a solar PV energy facility and the potential impacts will take place over a period of 20 – 25 years. The predicted negative impacts are generally associated with habitat destruction caused by clearance of vegetation, displacement of priority avian species from important habitats, potential collision of avifauna and visual impact of sensitive visual receptors located within a 500m radius of the proposed development. The provision of sustainable services delivery also needs to be confirmed. The operational phase will have a direct positive impact through the creation of employment opportunities and skills development, development of non-polluting, renewable energy infrastructure and contribution to economic development and social upliftment.

Predicted Impacts during the decommissioning phase:

The negative impacts generally associated with the decommissioning phase include: habitat destruction caused by clearance of vegetation and the loss of permanent employment. However, skilled staff will be eminently employable and a number of temporary jobs will also be created in the process. It is not expected that the facility will be decommissioned, but rather that the technology used will be upgraded.

Cumulative impacts:

Cumulative impacts could arise as other similar projects are constructed in the area. According to the Department of Forestry, Fisheries and Environment database three (03) other solar plants have been proposed in relatively close proximity to the proposed activity.

The potential for cumulative impacts may therefore exist. The Draft Scoping Report includes an assessment of the potential cumulative impacts associated with the proposed development.

Potential cumulative impacts with a significance rating of negative medium during the construction phase relate to: habitat destruction and fragmentation, impact on the characteristics of the watercourse, displacement of priority avian species from important habitats, loss of important avian habitats, impacts of employment opportunities, business opportunities and skills development and impact associated with large-scale in-migration of people. Cumulative impacts during the operational phase relate to: habitat destruction and fragmentation, impacts on the characteristics of the watercourse and visual intrusion. The cumulative effect of the generation of waste was identified as being potentially significant during the decommissioning phase.

Regulation 23 of the EIA Regulations determine that an EIA report be prepared and submitted for the proposed activity after the competent authority approves the final scoping report. The EIA report will evaluate and rate each identified impact and identify mitigation measures that may be required. The EIA report will contain information that is necessary for the competent authority to consider the application for Environmental Authorisation and to reach a decision contemplated in Regulation 24 of the EIA Regulations.

1 INTRODUCTION

This section aims to introduce the Scoping Report and specifically to address the following requirements of the regulations:

Appendix 2. (2) A scoping report (...) must include- (a) details of:

- (i) the EAP who prepared the report; and
- (ii) the expertise of the EAP, including a curriculum vitae.

1.1 LEGAL MANDATE AND PURPOSE OF THE REPORT

The National Environmental Management Act identifies listed activities (in terms of Section 24) which are likely to have an impact on the environment. These activities cannot commence without obtaining an Environmental Authorisation (EA) from the relevant competent authority, the Department of Forestry, Fisheries and the Environment (DFFE). Sufficient information is required by the competent authority to make an informed decision and the project is therefore subject to an environmental assessment process which can be either a Basic Assessment Process or a full Scoping and Environmental Impact Assessment process.

The Listing Notices 1, 2 and 3 (GNR 327, 325 and 324) outline the activities that may be triggered and therefore require EA. This implies that the development is considered as potentially having a significant impact on the environment. Subsequently a 'thorough S&EIA assessment process' is required as described in Regulations 21-24. A detailed description of the listed activities that are triggered are included in chapter 2 to follow. According to Appendix 2 of Regulation 326 the objective of the scoping process is to, through a consultative process:

- Identify the relevant policies and legislation relevant to the activity;
- Motivate the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location;
- Identify and confirm the preferred activity and technology alternative through an identification of impacts and risks and ranking process of such impacts and risks;
- Identify and confirm the preferred site, through a detailed site selection process, which includes an identification of impacts and risks inclusive of identification 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;
- Identify the key issues to be addressed in the assessment phase;
- 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

- 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.

This Draft Scoping Report has been submitted to the DFFE for review and comment. According to Regulation 326 all registered I&APs and relevant State Departments (including Organs of State) must be allowed the opportunity to review and provide comment on the scoping report. The Draft Scoping Report has been made available to I&APs and all relevant State Departments. They have been requested to provide written comments on the report within 30 days of receiving it. All issues to be identified and comments received during the review period will be documented and compiled into a Comments and Response Report to be included as part of this Final Scoping Report. Where comments have been received prior to the release of the Draft Scoping Report for the 30-day review and comment period, these comments have been included in Appendix C5 and C6 and has also been included and responded to in the Comments and Responses Report (Appendix C7).

1.2 DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP)

Environamics was appointed by the applicant as the independent EAP to conduct the S&EIR process and prepare all required reports. All correspondence to the EAP can be directed to:

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And/or

Contact person: Roschel Maharaj
EAPASA Registration: 2019/824
Postal Address: 14 Kingfisher Street, Tuscan Ridge Estate, Potchefstroom, 2531
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Electronic Mail: roschel@environamics.co.za

Regulation 13(1)(a) and (b) determines that an independent and suitably qualified and experienced EAP should conduct the S&EIR process. In terms of the independent status of the EAP a declaration is attached as Appendix A to this report. The expertise of the EAP responsible for

conducting the S&EIR process is also summarized in the curriculum vitae included as part of Appendix A.

1.3 DETAILS OF SPECIALISTS

Table 1.1 provides information on the specialists that have been appointed as part of the S&EIR process. Regulation 13(1)(a) and (b) determines that an independent and suitably qualified, experienced and independent specialist should conduct the specialist study, in the event where the specialist is not independent, a specialist should be appointed to externally review the work of the specialist as contemplated in sub regulation (2), must comply with sub regulation 1. In terms of the independent status of the specialists, their declarations are attached as Appendix E to this report. The expertise of the specialists is also summarized in their respective reports.

Table 1.1: Details of Specialists

Study	Prepared by	Contact Person	Postal Address	Tel	e-mail
Geotechnical Desktop Study	Delta Geotech	Matthew Jones	17 Clearview Place, Beacon Bay, East London, 5241	Tel: +27 81 586 7378	mattew@deltageotech.co.za
Avifauna Scoping Report	Pachnoda Consulting CC	Lukas Niemand	PO Box 72847, Potchefstroom 2522	Cell: 082 214 3738	adrian.haagner@agreencogroup.com
Ecological Scoping Report	Biodiversity Africa	Tarryn Martin	30 Chudleigh Road, Plumstead, 7800, Cape Town, Western Cape	Cell: 071 332 3994/ 078 340 6295	Tarryn@biodiversityafrica.com
Phase 1 Cultural Heritage Impact Assessment	J van Schalkwyk	J van Schalkwyk	62 Coetzer Avenue, Monument Park, 0181	Cell: 076 790 6777	jvschalkwyk@mweb.co.za
Paleontological Desktop Assessment	Banzai Environmental (Pty) Ltd	Elize Butler	-	Cell: 084 447 8759	info@banzai-group.com
Agricultural Compliance Statement	Johann Lanz Soil Scientist	Johann Lanz	1A Wolfe Street, Wynberg, 7800, Cape Town	Cell: 082 927 9018	johann@johannlanz.co.za
Visual Impact Assessment	Donaway Environmental Consultants	Johan Botha	30 Fouche Street, Steynsrus, 9515	Tel: 082 316 7749	johan@donaway.co.za
Social Impact Assessment	Donaway Environmental Consultants	Johan Botha	30 Fouche Street, Steynsrus, 9515	Cell: 082 493 5166	johan@donaway.co.za
Traffic Impact Assessment	iWink Consulting (Pty) Ltd	Iris Wink	Plattekloof Glen	Cell: 082 691 9096	iris@iwink.co.za
Aquatic Ecological Assessment	EnviroSci (Pty) Ltd	Dr Brian Colloty	1 Rossini Road, Pari Park, Gqeberha, 6070	Cell: 083 498 3299	brianc@envirosci.co.za

1.4 STATUS OF THE S&EIR PROCESS

The Scoping and Environmental Impact Reporting (S&EIR) process is conducted strictly in accordance with the stipulations set out in Regulations 21-24 of Regulation No. 326. Table 1.2 provides a summary of the S&EIR process and future steps to be taken. It can be confirmed that to date:

- A pre-application meeting request was submitted to DFFE on 17 November 2022.
- The DFFE indicated that a pre-application meeting is not required, in an email dated 21 November 2022.
- A newspaper advertisement was placed in the Bloemnuus on 13 October 2022, informing the public of the S&EIR process and for the public to register as I&APs.
- A site visit was conducted by the EAP on 6 October 2022.
- Site notices were erected on site on 6 October 2022 informing the public of the commencement of the S&EIR process.
- The Background Information Document (BID) was circulated to all I&APs and surrounding landowners on 14 November 2022.
- An application form and the draft Scoping Report has been submitted to DFFE on 20 January 2023.
- The draft Scoping Report has been made available for a 30-day review and comment period from 20 January 2023 to 20 February 2023.

It is envisaged that the Final Scoping Report will be submitted to the Department in February 2023 and that the Final Scoping Report will be accepted by the Department in April 2023. The S&EIR process should be completed within approximately nine months of submission of the Draft Scoping Report, i.e., by September 2023 – see Table 1.2.

Table 1.2: Estimated timeframe for completion of the ‘scoping and EIA process’

Activity	Prescribed timeframe	Timeframe
Site visit		6 October 2022
Public participation (BID)	30 Days	14 November – 14 December 2022
Submit application form and DSR	-	20 January 2023
Public participation (DSR)	30 Days	20 January – 20 February 2023
Submit FSR	44 Days	February 2023

Department acknowledges receipt	10 Days	March 2023
Department approves/reject	43 Days	By April 2023
Public participation (DEIR)	30 Days	April – May 2023
Submission of FEIR & EMPr	-	May 2023
Department acknowledges receipt	10 Days	May 2023
Decision	107 Days	September 2023
Department notifies of decision	5 Days	September 2023
Registered I&APs notified of decision	14 Days	September 2023
Appeal	20 Days	September/October 2023

Table 1.3 below provides more detail on timeframes as well as process flow for the S&EIR process.

Table 1.3: Estimated timeframe for completion of the 'S&EIR processes' for Luckhoff solar 3 PV facility

Tasks to be performed	October				November				December				January				February				March				April				May				June				July				August				September			
	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4				
REGISTRATION PHASE																																																
Pre-application meeting (DFE doesn't require meeting)							X																																									
Site visits	X																																															
Public participation																																																
- Press advertisement		X																																														
- On site advertisement	X																																															
- Distribution of notices	X																																															
- Complete PP report																			X																													
Specialist inputs and reports																																																
- Draft terms of reference																																																
- Receive specialist studies															X																																	
'Draft' Scoping Report																																																
- Information gathering															X																																	
- Report writing															X																																	
- Circulate 'Draft' Scoping Report															X																																	
SCOPING PHASE																																																
Complete and submit application form																																																
- Information gathering																																																
- Complete and submit application form																																																
Authority acknowledges receipt of application form															X																																	
Final Scoping Report																																																
- Information gathering																																																
- Report writing																																																
- Submission of Final Scoping Report																			X																													
- Approval																											X																					
EIA PHASE																																																
Specialist inputs and reports																																																
- Draft terms of reference																																																
- Receive specialist studies																																																
Draft EIR Report																																																
- Circulate																											X																					
Final EIA Report & EMP																																																
- Submission																																																
The competent authority has 107 days for decision-making after the EIR has been submitted and an additional 5 days to notify the applicant in writing of their decision. The applicant must within 14 days of the date of the decision notify registered I&APs of the decision. Registered I&APs are then provided 20 days in which to lodge appeals. The appeal period expires 20 days after registered I&APs have been informed of the decision according to GNR326, Regulation 7.																																																

1.5 SPECIALIST STUDIES IDENTIFIED IN THE DFFE SCREENING TOOL REPORT

In terms of GN R960 (promulgated on 5 July 2019) and Regulation 16(1)(b)(v) of the 2014 EIA Regulations (as amended), the submission of a Screening Report generated from the national web based environmental screening tool is compulsory for the submission of applications in terms of Regulations and 21 – 24 of the EIA Regulations.

The requirement for the submission of a Screening Report for the Luckhoff solar 3 PV facility is applicable as it triggers Regulation 21 of the EIA Regulations, 2014 (as amended). The Screening Report has been appended to the Application for EA as submitted to the DFFE on 20 January 2023.

The table included below provides an indication of the specialist studies identified by the DFFE Screening Tool Report (Appendix B), an indication of whether the studies were undertaken or not and a motivation or confirmation of the studies being included or not.

Table 1.4: Specialist studies identified by the DFFE Screening Tool Report (Appendix B)

Study identified in the DFFE Screening Tool and sensitivity	Study included?	Appendix
Agricultural Impact Assessment Sensitivity: Medium	Yes	An Agricultural Compliance Statement is included in Appendix E4 of the Scoping Report.
Animal Species Assessment Sensitivity: Medium	Yes	Refer to Appendix E1. The Ecological Impact Assessment also includes the relevant Plant Species Assessment. This assessment has been undertaken in terms of the Protocols of GNR320 – refer to the content of the report.
Aquatic Biodiversity Impact Assessment Sensitivity: Low	Yes	An Aquatic Ecological Impact Assessment is included in Appendix E1. This assessment has been undertaken in terms of the Protocols of GNR320 – refer to the content of the report.
Archaeological and Cultural Heritage Impact Assessment	Yes	A Heritage Impact Assessment is included in Appendix E5 of the



Sensitivity: Low		Scoping Report, as per the requirements of the National Heritage Resources Act.
Avian Impact Assessment Sensitivity: Low	Yes	An avifaunal scoping report is included in Appendix E2.
Civil Aviation Assessment Sensitivity: Low	No	<p>The identification of the site as low sensitivity considering civil aviation is agreed to by the EAP. This is based on the current land use of the site being used for agricultural purposes.</p> <p>The Civil Aviation Authority has been consulted regarding the development of the project since the commencement of the S&EIR Process. No specific negative impacts or issues have been raised to date by the CAA regarding the project. The project is also not located within an area considered to be of a high sensitivity.</p>
Defence Theme Sensitivity: Low	No	<p>The affected property is confirmed to be used for agricultural purposes and therefore the development will not have any impact on defence installations.</p> <p>The sensitivity for the entire extent of the site is low and therefore no assessment has been included.</p> <p>The South African National Defence Force has been consulted regarding the development of the project since the commencement of the S&EIR Process. No specific negative impacts or issues have been raised to date regarding the project. The project is also not</p>



		located within an area considered to be of a high sensitivity.
Landscape / Visual Impact Assessment Sensitivity: Very High	Yes	A Visual Impact Assessment is included in Appendix E3 of the Scoping Report.
Palaeontological Impact Assessment Sensitivity: High	Yes	A Palaeontological Impact Assessment is included in Appendix E6 of the Scoping Report, as per the requirements of the National Heritage Resources Act.
Plant species Assessment Sensitivity: Medium	Yes	Refer to Appendix E1. The Ecological Impact Assessment also includes the relevant Plant Species Assessment. This assessment has been undertaken in terms of the Protocols of GNR320 – refer to the content of the report.
RFI Assessment Sensitivity: Medium	No	The RFI theme sensitivity is medium for the entire extent of the project. The South African Radio Astronomy Observatory (SARAO) has been consulted regarding the development of the project since the commencement of the S&EIR Process. No specific negative impacts or issues have been raised to date by the SARAO regarding the project. The project is also not located within an area considered to be of a high sensitivity.
Terrestrial Biodiversity Impact Assessment Sensitivity: Very High	Yes	An Ecological Impact Assessment is included in Appendix E1.

		This assessment has been undertaken in terms of the Protocols of GNR320 – refer to the content of the report.
Geotechnical Assessment Sensitivity: Not indicated	Yes	The detailed Geotechnical Assessment will be conducted before construction begins as part of the micro-siting of the facility layout. The consideration of geotechnical aspects is considered to be of a technical concern rather than an environmental concern. A Desktop Geotechnical Assessment is included in Appendix E9.
Socio-Economic Assessment Sensitivity: Not indicated	Yes	A Social Impact Assessment is included in Appendix E7.

1.6 STRUCTURE OF THE REPORT

This report is structured in accordance with the prescribed contents stipulated in Appendix 2 of Regulation No.326. It consists of eight sections demonstrating compliance to the specifications of the regulations as illustrated in Table 1.5.

Table 1.5: Structure of the report

Requirements for the contents of a scoping report as specified in the Regulations		Section in report
(a)	details of -	1
	(i) the EAP who prepared the report; and	
	ii) the expertise of the EAP, including a curriculum vitae.	
(b)	the location of the activity, including-	2
	(i) the 21-digit Surveyor General code of each cadastral land parcel;	

	(ii) where available, the physical address and farm name;	
	(iii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties;	
(c)	a plan which locates the proposed activity or activities applied for at an appropriate scale, or, if it is-	
	(i) a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or	
	(ii) on land where the property has not been defined, the coordinates within which the activity is to be undertaken;	
(d)	a description of the scope of the proposed activity, including-	
	(i) all listed and specified activities triggered;	
	(ii) a description of the activities to be undertaken, including associated structures and infrastructure.	
(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 are to be considered in the assessment process;	3
(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;	4
(g)	a full description of the process followed to reach the proposed preferred activity, site and location of the development footprint within the site, including –	
	(i) details of all the alternatives considered;	
	(ii) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;	5
	(iii) 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.	
	(iv) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;	
	(ix) the outcome of the site selection matrix;	

	<p>(x) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such and</p> <p>(xi) a concluding statement indicating the preferred alternatives, including preferred location of the activity;</p>	
(g)	<p>(v) the impacts and risks which have informed the identification of each alternative, including the nature, significance, consequence, extent, duration and probability of such identified impacts, including the degree to which these impacts- (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated;</p> <p>(vi) the methodology used in identifying and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;</p> <p>(vii) 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;</p> <p>(viii) the possible mitigation measures that could be applied and level of residual risk;</p>	6
(i)	<p>a plan of study for undertaking the environmental impact assessment process to be undertaken, including-</p> <p>(i) a description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity;</p> <p>(ii) a description of the aspects to be assessed as part of the EIA process;</p> <p>(iii) aspects to be assessed by specialists;</p> <p>(iv) a description of the proposed method of assessing the environmental aspects, including aspects to be assessed by specialists;</p> <p>(v) a description of the proposed method of assessing duration and significance;</p> <p>(vi) an indication of the stages at which the competent authority will be consulted;</p> <p>(vii) particulars of the public participation process that will be conducted during the EIA process; and</p> <p>(viii) a description of the tasks that will be undertaken as part of the EIA process;</p>	8

	(ix) identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored.	
(j)	an undertaking under oath or affirmation by the EAP in relation to- (i) the correctness of the information provided in the report; (ii) the inclusion of comments and inputs from stakeholders and interested and affected parties; and (iii) any information provided by the EAP to I&APs and any responses by the EAP to comments or inputs made by I&APs;	Appendix A to the report
(k)	an undertaking under oath or affirmation by the EAP in relation to the level of agreement between the EAP and I&APs on the plan of study for undertaking the EIA;	
(l)	where applicable, any specific information required by the CA; and	N/A
(m)	any other matter required in terms of section 24(4)(a) and (b) of the Act.	N/A

2 ACTIVITY DESCRIPTION

This section aims to address the following requirements of the regulations:

Appendix 2. (2) A scoping report (...) must include-

(b) the location of the activity, including-

- (i) the 21-digit Surveyor General code of each cadastral land parcel;
- (ii) where available, the physical address and farm name;
- (iii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties;

(c) a plan which locates the proposed activity applied for at an appropriate scale, or, if it is-

- (i) a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or
- (ii) on land where the property has not been defined, the coordinates within which the activity is to be undertaken;

(d) a description of the scope of the proposed activity, including-

- (i) all listed and specified activities triggered;
- (ii) a description of the activities to be undertaken, including associated structures and infrastructure.

2.1 THE LOCATION OF THE ACTIVITY AND PROPERTY DESCRIPTION

The project entails the development of a photovoltaic solar facility and associated infrastructure on the Farm Vijeboom No. 714, Farm Rorich's Hulp No. 505, Farm Klein Palmietfontein No. 370, and Farm De Dorpsgronden Van Luckhoff No. 577, Registration Division Fauresmith, Free State Province situated within the Letsemeng Local Municipality area of jurisdiction. The proposed development is located in the Free State Province in the central interior of South-Africa (refer to Figure B for the regional map). The town of Luckhoff is located approximately 3km south of the proposed development (refer to Figure A for the locality map).

The project entails the generation of up to 240MW electrical power through the installation and operation of photovoltaic (PV) panels. An area of 559 ha has been assessed as part of this Scoping Report (hereafter referred to as the "development area"). The full extent of the development area has been considered during scoping with the aim of confirming the suitability from an environmental and social perspective. A development footprint will be defined based on the outcomes of the scoping phase and will be further assessed in the EIA phase. It is envisioned that the development footprint for Luckhoff Solar 3 will be ~480 ha in extent. The property on which

the facility is to be constructed will be leased by Luckhoff Solar 3 (Pty) Ltd from the property owner for the life span of the project (minimum of 20 years).

Energy generated by the facility will be transmitted from the facility substation / Eskom switching station to the Luckhoff Main Transmission Substation via a new 132kV powerline. A separate Basic Assessment is being undertaken to assess the grid connection infrastructure.

Table 2.1: General site information

Description of affected farm portion	<p><u>Solar PV Facility:</u></p> <ul style="list-style-type: none"> • Farm Vijeboom No. 714 • Farm Rorich’s Hulp No. 505 • Farm Klein Palmietfontein No. 370 <p><u>Proposed Access Road:</u></p> <ul style="list-style-type: none"> • Farm De Dorpsgronden Van Luckhoff No. 577
Province	Free State
District Municipality	Xharirp District Municipality
Local Municipality	Letsemeng Local Municipality
Ward numbers	Ward 1
Closest towns	The town of Luckhoff is located approximately 3km south of the proposed development.
21 Digit Surveyor General codes	<p><u>Solar PV Facility:</u></p> <p>Farm Vijeboom No. 714</p> <ul style="list-style-type: none"> • F0110000000071400000 <p>Farm Rorich’s Hulp No. 505</p> <ul style="list-style-type: none"> • F0110000000050500000 <p>Farm Klein Palmietfontein No. 370</p> <ul style="list-style-type: none"> • F0110000000037000000 <p><u>Proposed Access Road:</u></p> <p>Farm De Dorpsgronden Van Luckhoff No. 577</p> <ul style="list-style-type: none"> • F0110000000057700000
Title Deed	<p>Farm Vijeboom No. 714 - T56710/1899</p> <p>Farm Rorich’s Hulp No. 505 - T35955/1889</p> <p>Farm Klein Palmietfontein No. 370 - T19536/1997</p>

	Farm De Dorpsgronden Van Luckhoff No. 577 - T56703/1899
Photographs of the site	Included in Plates as an appendix to the Report
Type of technology	Photovoltaic solar facility
Structure Height	<ul style="list-style-type: none"> • Panels ~6m, • Buildings ~ 9m, • Battery storage facility ~8m
Battery storage	Within a 5ha area within the development footprint
Surface area to be covered (development footprint)	Approximately 480 ha
Structure orientation	Monofacial or Bifacial PV panels will be utilised. The panels will either be fixed to a single-axis and/or double horizontal tracking structure where the orientation of the panel varies according to the time of the day, as the sun moves from east to west or tilted at a fixed angle equivalent to the latitude at which the site is located in order to capture the most sun.
Laydown area dimensions (area assessed as part of the EIA)	Temporary laydown areas will occupy up to 5 hectares while 1 hectare will remain in place for the permanent laydown areas as required for facility operation.
Generation capacity	Up to 240MW
Expected production	N/A - this will be dependent on the chosen technology.

The site is located in a rural area and is bordered by agricultural land uses, as well as mining activities. The site survey revealed that the affected property currently consists of agricultural activities – refer to plates 1- 9 for photographs of the affected property and proposed development footprint area.

2.2 ACTIVITY DESCRIPTION

The proposed development will trigger the following activities:

Table 2.2: Listed activities

Relevant notice:	Activity No (s)	Description of each listed activity as per project description:
GNR. 327 (as amended in 2017)	Activity 11(i)	<ul style="list-style-type: none"> • <i>“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.”</i> • Activity 11(i) is triggered as energy generated by the PV array will be transmitted via underground medium voltage cables (i.e., up to 33kV) to the onsite Luckhoff Solar 3 substation (the onsite facility substation) where it will be stepped-up to 132kV. Thereafter, the electricity will pass to offsite facility substation infrastructure (~150 m east of the facility) via a 132kV overhead powerline.
GNR. 327 (as amended in 2017)	Activity 12(ii)(a)(c)	<ul style="list-style-type: none"> • <i>“The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (a) within a watercourse (c) within 32 meters of a watercourse measured from the edge of a watercourse.”</i> • Activity 12(ii)(c) is triggered based on the presence of two (02) small depressions (wetland feature) located adjacent to the development area and the proposed development is expected to be situated within 32m from a watercourse. The project area comprises of existing roads which potentially traverse watercourse. The existing access roads that traverse watercourses may be expanded to suit the project needs.
GNR. 327 (as amended in 2017)	Activity 19	<ul style="list-style-type: none"> • <i>“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.”</i> • Activity 19 is triggered as the project area comprises of existing roads which potentially traverse watercourse. The existing access roads that traverse watercourses may be expanded to suit the project needs. Construction of the main access road will require removal of more than 10 cubic metres of soil from a watercourse identified by the aquatic specialist.
GNR. 327 (as amended in 2017)	Activity 24(ii)	<ul style="list-style-type: none"> • <i>“The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters.”</i>

		<ul style="list-style-type: none"> Activity 24(ii) is triggered as the proposed main access road to Luckhoff Solar 3 will be up to 8m wide, but with the inclusion of side drains and gavel embankments, will exceed the threshold of this activity.
GNR. 327 (as amended in 2017)	Activity 28(ii)	<ul style="list-style-type: none"> <i>“Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare.”</i> Activity 28(ii) is triggered as the total area to be developed for the PV facility and associated infrastructure is greater than 1ha and occurs outside an urban area in an area currently zoned for agriculture. The property will be re-zoned to “special” use.
GNR. 327 (as amended in 2017)	Activity 56(ii)	<ul style="list-style-type: none"> <i>“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...”</i> Activity 56 (ii) is triggered since the existing access to the affected property does not have a reserve and will need to be widened by more than 6 metres.
GNR. 325 (as amended in 2017)	Activity 1	<ul style="list-style-type: none"> <i>“The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more.”</i> Activity 1 is triggered since the proposed photovoltaic solar energy facility will generate up to 240 megawatts of electricity through the use of a renewable resource.
GNR. 325 (as amended in 2017)	Activity 15	<ul style="list-style-type: none"> <i>“The clearance of an area of 20 hectares or more of indigenous vegetation.”</i> According to the Ecological Impact Assessment, the entire site occurs within the vegetation type <i>Northern Upper Karoo</i> and is listed as Least Concern. Activity 15 is triggered since portions of the site has not been lawfully disturbed during the preceding ten years; therefore, more than 20 hectares of indigenous vegetation will be removed. The development footprint of the solar PV facility will be approximately 480ha in extent.
GNR. 324 (as amended in 2017)	Activity 4 (b)(i)(ee)(gg)	<ul style="list-style-type: none"> <i>“The development of a road wider than 4 metres with a reserve less than 13,5 metres within (b) the Free State, (i) outside urban areas, (ee) within critical biodiversity areas as identified in systematic biodiversity plans adopted by</i>

		<p><i>the competent authority or in bioregional plans, (gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve, excluding disturbed areas.”</i></p> <ul style="list-style-type: none"> Activity 4 (b)(i)(ee) is triggered as internal and perimeter access roads with a width of between 6 and 10 meters will be constructed. According to the Ecological Impact Assessment, a small portion of the southern section of the project area occurs within a CBA 1 and CBA 2, whilst the remaining majority of the site occurs within an ESA 1. The Thanda Tula Nature Reserve is a protected area and is also located within 5km of the proposed project area.
<p>GNR. 324 (as amended in 2017)</p>	<p>Activity 10 (b)(i)(ee)(gg)(hh)</p>	<ul style="list-style-type: none"> <i>“The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (b) in the Free State, (i) outside urban areas,(ee) critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans (gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve and (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland.”</i> Activity 10(b)(i)(ee)(gg)(hh) is triggered since the proposed development will need to develop infrastructure for the storage and handling of dangerous goods (diesel and/or oils) in containers with a capacity exceeding 30 but not exceeding 80 cubic metres. The project is located within the Free State Province. According to the Ecological Impact Assessment, a small portion of the southern section of the project area occurs within a CBA 1 and CBA 2, whilst the remaining majority of the site occurs within an ESA 1. The Thanda Tula Nature Reserve is a protected area and is also located within 5km of the proposed project area. The aquatic ecologist has identified the presence of two (02) small depressions (wetland feature) located adjacent to the development area and the proposed development is expected to be situated within 32m from a watercourse.

<p>GNR. 324 (as amended in 2017)</p>	<p>Activity 12 (b)(ii)(iv)</p>	<ul style="list-style-type: none"> • <i>“The clearance of an area of 300 square metres or more of indigenous vegetation (b) in the Free State, (ii) within critical biodiversity areas identified in bioregional plans (iv) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland.”</i> • Activity 12 (b)(ii)(iv) is triggered since the proposed development is located in the Free State province. According to the Ecological Impact Assessment, a small portion of the southern section of the project area occurs within a CBA 1 and CBA 2, whilst the remaining majority of the site occurs within an ESA 1. The aquatic ecologist has identified the presence of two (02) small depressions (wetland feature) located adjacent to the development area and the proposed development is expected to be situated within 32m from a watercourse.
<p>GNR. 324 (as amended in 2017)</p>	<p>Activity 14(ii)(a)(c)(b) (i)(ff)(hh)</p>	<ul style="list-style-type: none"> • <i>“The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more, where such development occurs (a) within a watercourse or (c) within 32 metres of a watercourse, measured from the edge of a watercourse, (b) within the Free State, (i) outside urban areas within (ff) critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans (hh) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core area of a biosphere reserve.”</i> • Activity 14(ii)(a)(c)(b)(i)(ff)(hh) is triggered as the aquatic ecologist has identified the presence of two (02) small depressions (wetland feature) located adjacent to the development area and the proposed development is expected to be situated within 32m from a watercourse. According to the Ecological Impact Assessment, a small portion of the southern section of the project area occurs within a CBA 1 and CBA 2, whilst the remaining majority of the site occurs within an ESA 1. The Thanda Tula Nature Reserve is a protected area and is also located within 5km of the proposed project area.
<p>GNR. 324 (as amended in 2017)</p>	<p>Activity 18 (b)(i)(gg)(hh)</p>	<ul style="list-style-type: none"> • <i>“The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (b) Free State (i) outside urban areas, within (gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core area of a biosphere</i>

		<p><i>reserve and (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland.”</i></p> <ul style="list-style-type: none"> • Activity 18 (b)(i)(ee)(hh) is triggered since the existing access road to the site will need to be widened by more than 4 metres. The project is located within the Free State Province and outside urban areas. The aquatic ecologist has identified the presence of two (02) small depressions (wetland feature) located adjacent to the development area and the proposed development is expected to be situated within 32m from a watercourse. The Thanda Tula Nature Reserve is a protected area and is also located within 5km of the proposed project area.
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The potentially most significant impacts will occur during the construction phase of the development, which will include the following activities:

- Site clearing and preparation: Certain areas of the site and access road will need to be cleared of vegetation and some areas may need to be levelled.
- Civil works to be conducted:
 - Terrain levelling if necessary– Levelling will be minimal as the potential site chosen is relatively flat.
 - Laying foundation- The structures will be connected to the ground through cement pillars, cement slabs or metal screws. The exact method will depend on the detailed geotechnical analysis.
 - Construction of access and inside roads/paths – The majority of the access road will follow existing, gravel farm roads that may require widening up to 10 m (inclusive of storm water infrastructure). Where new sections of road need to be constructed (lengthened), this will be gravel/hard surfaced access road and only tarred if necessary. A network of gravel internal access roads and a perimeter road of up to 33 km, each with a width of up to 6 m, will be constructed to provide access to the various components of the PV development.
 - Trenching – all Direct Current (DC) and Alternating Current (AC) wiring within the PV plant will be buried underground. Trenches will have a river sand base, space for pipes, backfill of sifted soil and soft sand and concrete layers where vehicles will pass.

2.3 PHOTOVOLTAIC TECHNOLOGY

The term photovoltaic describes a solid-state electronic cell that produces direct current electrical energy from the radiant energy of the sun through a process known as the Photovoltaic Effect. This refers to light energy placing electrons into a higher state of energy to create electricity. Each PV cell is made of silicon (i.e., semiconductors), which is positively and negatively charged on

either side, with electrical conductors attached to both sides to form a circuit. This circuit captures the released electrons in the form of an electric current (direct current).

The key components of the proposed project are described below:

- PV Panel Array - To produce up to 240MW, the proposed facility will require numerous linked cells placed behind a protective glass sheet to form a panel. Multiple panels will be required to form the solar PV arrays which will comprise the PV facility. The PV panels will be tilted at a northern angle in order to capture the most sun or using one-axis tracker structures to follow the sun to increase the yield.



Figure 2.1: Typical example of solar PV array

- Wiring to Central Inverters - Sections of the PV array will be wired to central inverters. The inverter is a pulse width mode inverter that converts direct current (DC) electricity to alternating current (AC) electricity at grid frequency.
- Electrical reticulation network – Energy generated by the PV array will be transmitted via underground medium voltage cables (i.e., up to 33kV) to the onsite Luckhoff Solar 3 substation (the onsite facility substation) where it will be stepped-up to 132kV. Thereafter, the electricity will pass to an offsite facility substation infrastructure (~150 m east of the facility) via a 132kV overhead powerline.

- **Supporting Infrastructure** – The following auxiliary buildings including a gate house, ablutions, workshops, storage and warehousing areas, site offices and a control centre. The project requires the need for both temporary and permanent laydown areas.
- **Battery Energy Storage System** – The Battery Storage Facility will occupy an area of up to 5 hectares. The specifications and the exact capacity of the battery storage remains unspecified at this stage.
- **Roads** – The majority of the access road will follow existing, gravel farm roads that may require widening up to 6 -10 m (inclusive of storm water infrastructure). Where new sections of road need to be constructed (lengthened), this will be gravel/hard surfaced access road and only tarred if necessary. A network of gravel internal access roads and a perimeter road of up to 33 km, each with a width of up to 6 m, will be constructed to provide access to the various components of the PV development. Access will be obtained via the S572 off the R48, an existing gravel road located adjacent to the site.
- **Fencing** - For health, safety and security reasons, the facility will be required to be fenced off from the surrounding farm. Fencing with a height of 3.5 meters will be used.

2.4 LAYOUT DESCRIPTION

The layout plan will consider limitations of the site and aspects such as environmentally sensitive areas, roads, fencing and servitudes on site – refer to Figure A to J. The total surface area proposed for the layout includes the PV panel arrays (spaced to avoid shadowing), access and maintenance roads and associated infrastructure (buildings, power inverters, power line, battery energy storage system, on-site substation and switching station and perimeter fences). Limited features of environmental significance exist on site, however the sensitivities that do exist have to be avoided in the layout of the solar facility which will be further assessed during the EIA phase (refer to Figure A to H).

Table 2.3 below provides detailed information regarding the layout for the proposed facility as per DFFE requirements.

Table 2.3: Technical details for the proposed facility

Component	Description / dimensions
Height of PV panels	6 meters
Area of PV Array	To be confirmed upon receipt of specialist verification findings
Area occupied by inverter / transformer stations / substations / BESS	BESS: up to 5 ha Facility substation: up to 1 ha
Capacity of on-site substation	132kV

Capacity of the power line	132kV
Area occupied by both permanent and construction laydown areas	Temporary Laydown Area: up to 5 ha Permanent Laydown Area: Less than 1 ha will remain in place for operations
Area occupied by buildings	A 33 kV switch room, a gate house, ablutions, workshops, storage and warehousing areas, site offices and a control centre: ~ 1Hectares
Battery storage facility	The Battery Storage Facility will occupy an area of up to 5 hectares. The specifications and the exact capacity of the battery storage remains unspecified at this stage.
Length of internal roads	Approximately 33 km
Width of internal roads	Approximately 6 meters <i>N.B: Only the main access roads may be widened up to 10 meters</i>
Grid connection corridor width	A 100 m wide grid connection corridor
Grid connection corridor length	Approximately 150 m
Power line servitude width	Up to 36 m
Height of fencing	Approximately 3.5 meters

2.5 SERVICES PROVISION

The following sections provides information on services required on the site e.g., water, sewage, refuse removal, and electricity.

2.5.1 Water

Adequate provision of water will be a prerequisite for the development. Four options will be considered, in order of priority by the Developer:

1. Supply from the Local Municipality (LM). The Developer will approach the Local Municipality to enquire whether they can provide all or part of the total water requirements of the Project. Specific arrangements will be agreed with the Local Municipality in a Service Level Agreement (SLA), following the appointment of preferred bidder during the financial close period.
2. Supply from a Private Contractor, which may include extraction from any bulk water supply lines nearby to the site.

3. An existing borehole on site, subject to NWA requirements.
4. A new borehole on site, subject to NWA requirements.

The estimated maximum amount of water required during construction is 34 100kl. The estimated maximum amount of water required during the operational phase is 9 547 kl per annum.

2.5.2 Stormwater

The need for stormwater management and mitigation measures will be considered by a stormwater specialist and any recommendations/management plans included in the Environmental Management Programme (EMPr) to be submitted as part of the EIR.

2.5.3 Sanitation

During construction phase, portable chemical toilets will be utilised, that will be serviced privately or by the local municipality. Wastewater will be disposed of at a licensed landfill site. Should the contractor decide to install a conservancy tanks/s, this will be done in accordance with the NWA.

No effluent will be produced during operation of the facility, except for normal sewage from site and operations staff. This will be collected and treated as per normal standards using a septic or conservancy tank. In cases where the Local Municipality does not permit the use of septic tanks, sewage will be stored in conservancy tank and collected by means of a honey-sucker and treated at an approved facility off site.

2.5.4 Solid Waste

During the construction phase, solid waste 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 an appointed contractor. Any other waste and excess material will be removed once construction is complete and disposed of at a registered waste facility. During the EIA, the applicant will request confirmation from the municipality that they have sufficient capacity at their registered landfills for the solid waste.

During the operational phase household waste will be removed to a licensed landfill site by a private contractor or by the local municipality.

2.5.5 Electricity

Electricity supply during construction will be provided by either diesel generators or arranged with the Local Municipality or Eskom Distribution, via an 11 kV or 22 kV feeder line.

During operation, the electricity will be supplied by the plant.

2.6 Decommissioning of the facility

The operating period will be 20-25 years from the commencement date of the operation phase. It is anticipated that new PV technologies and equipment will be implemented, within the scope of the Environmental Authorisation, when influencing the profitability of the solar facility.

A likely extension of the plant's lifetime would involve putting new, more efficient, solar panels on the existing structures to improve the efficiency of the facility as the technology improves. The specifications of these new panels will be the same as the current panels under consideration, but the conversion efficiency of sunlight to energy will be greater (comparable to new computer chips, that are the same, but faster and more efficient). If, for whatever reason the plant halts operations, the Environmental Authorisation and contract with the landowner will be respected during the decommissioning phase.

The decommissioning process will consist of the following steps:

- The PV facility would be disconnected from the Eskom grid.
- The BESS, inverters and PV modules would be disconnected and disassembled.
- Concrete foundations (if used) would be removed, and the structures would be dismantled.
- Wastewater storage conservancy tank would be responsibly removed, and area would be rehabilitated.
- The underground cables would be unearthed and removed, and buildings would be demolished and removed.
- The fencing would be dismantled and removed.
- The roads can be retained should the landowner choose to retain them, alternatively the roads will be removed, and the compaction will be reversed.
- Most of the wires, steel and PV modules are recyclable and would be recycled to a reasonable extent. The Silicon and Aluminium in PV modules can be removed and reused in the production of new modules.
- Any rubble and non-recyclable materials will be disposed of at a registered landfill facility.

The rehabilitation of the site would form part of the decommissioning phase. The aim would be to restore the land to its original form (or as close as possible). The rehabilitation activities would include the following:

- Removal of all structures and rubble;
- Breaking up compaction where required, loosening of the soil and the redistribution of topsoil; and
- Restoration of the surface to the original contours and application of hydro seeding.

3 LEGISLATIVE AND POLICY CONTEXT

This section aims to address the following requirements of the regulations:

Appendix 2. (2) A scoping report (...) must include-

(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 are to be considered in the assessment process;

3.1 INTRODUCTION

Environmental decision making with regards to solar PV plants is based on numerous policy and legislative documents. These documents inform decisions on project level environmental authorisations issued by the National Department of Forestry, Fisheries and the Environment (DFFE) as well as comments from local and district authorities. Moreover, it is significant to note that they also inform strategic decision making reflected in the IDPs and SDFs. Therefore, to ensure streamlining of environmental authorisations it is imperative for the proposed activity to align with the principles and objectives of key national, provincial and local development policies and legislation. The following acts and policies and their applicability to the proposed development are briefly summarised:

- The Constitution of the Republic of South Africa, 1996 (Act No. 108 of 1996)
- National Environmental Management Act, 1998 (Act No. 107 of 1998) [NEMA]
- The National Energy Act, 2008 (Act 34 of 2008)
- National Water Act, 1998 (Act No. 36 of 1998)
- National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)
- National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)
- The National Heritage Resources Act, 1999 (Act No. 25 of 1999)
- Conservation of Agricultural Resources Act, 1983 (Act No. 85 of 1983)
- The National Forests Act, 1998 (Act 84 of 1998)
- The White Paper on the Energy Policy of the Republic of South Africa (1998)
- The White Paper on Renewable Energy (2003)
- Integrated Resource Plan (IRP) for South Africa (2010-2030)
- National Development Plan of 2030
- National Infrastructure Plan of South Africa (2012)

- New Growth Path Framework (2010)
- Climate Change Bill (2018)
- Climate Change Bill (2021) – for public comment
- Strategic Integrated Projects (SIPs) (2010 – 2030)
- Strategic Environmental Assessment (SEA) for wind and solar PV Energy in South Africa (2014)
- Free State Provincial Spatial Development Framework (PSDF) (2012)
- Xhariep DM Reviewed Draft Integrated Development Plan (IDP) 2021 – 2021 (2021)
- Letsemeng Local Municipality Integrated Development Plan 2021/22 (2021)
- Letsemeng Spatial Development Framework 2019/2020 (SDF) (2018)

The key principles and objectives of each of the legislative and policy documents are briefly summarised in Tables 3.1 and 3.2 to provide a reference framework for the implications for the proposed activity.

3.2 LEGISLATIVE CONTEXT

Table 3.1: Legislative context for the construction of photovoltaic solar plants

LEGISLATION	ADMINISTERING AUTHORITY	DATE	SUMMARY / IMPLICATIONS FOR PROPOSED DEVELOPMENT
The Constitution of South Africa (Act No. 108 of 1996)	National Government	1996	<p>The Constitution is the supreme law of the Republic and all law and conduct must be consistent with the Constitution. The Chapter on the Bill of Rights contains a number of provisions, which are relevant to securing the protection of the environment. Section 24 states that “everyone has the right to (a) an environment that is not harmful to their health or well-being and (b) to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that – (i) prevent pollution and ecological degradation; (ii) promote conservation; and (iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development. The Constitution therefore, compels government to give effect to the people’s environmental right and places government under a legal duty to act as a responsible custodian of the country’s environment. It compels government to pass legislation and use other measures to protect the environment, to prevent pollution and ecological degradation, promote conservation and secure sustainable development.</p> <p>The development of the Luckhoff Solar 3 PV facility and the aspects related thereto considers the creation of an environment which is not harmful or degraded through the implementation of appropriate mitigation measures.</p>
The National Environmental Management Act (Act No. 107 of 1998)	National Department of Environmental Affairs (now known as the Department of Forestry, Fisheries and the Environment) and the Free State	1998	<p>NEMA provides for co-operative governance by establishing principles and procedures for decision-makers on matters affecting the environment. An important function of the Act is to serve as an enabling Act for the promulgation of legislation to effectively address integrated environmental management. Some of the principles in the Act are accountability; affordability; cradle to grave management; equity; integration; open information; polluter pays; subsidiary; waste avoidance and minimisation; co-operative governance; sustainable development; and environmental protection and justice.</p>



	<p>Province Department of Economic, Small Business Development, Tourism and Environmental Affairs (DESTEA)</p>		<p>The mandate for EIA lays with the National Environmental Management Act (107 of 1998) and the EIA Regulations No. 324, 325, 326, and 327 promulgated in terms of Section 24 of NEMA. The EIA Regulations determine that an Environmental Authorisation is required for certain listed activities, which might have a detrimental effect on the environment.</p> <p>The EIA process undertaken for the Luckhoff Solar 3 PV facility is in-line with the requirements of NEMA for the Application for Environmental Authorisation.</p>
<p>The National Energy Act (Act No. 34 of 2008)</p>	<p>Department of Mineral Resources and Energy</p>	<p>of 2008</p>	<p>One of the objectives of the National Energy Act was to promote diversity of supply of energy and its sources. In this regard, the preamble makes direct reference to renewable resources, including solar: “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, taking into account environmental management requirements (...); to provide for (...) increased generation and consumption of renewable energies...” (Preamble).</p> <p>Considering that the Luckhoff Solar 3 PV facility is proposed to make use of PV technology and the solar resource for the generation of electricity, the proposed project is in-line with the Act.</p>
<p>The National Water Act (Act No. 36 of 1998)</p>	<p>Department of Water Affairs (now known as Department of Water and Sanitation)</p>	<p>1998</p>	<p>Sustainability and equity are identified as central guiding principles in the protection, use, development, conservation, management and control of water resources. The intention of the Act is to promote the equitable access to water and the sustainable use of water, redress past racial and gender discrimination, and facilitate economic and social development. The Act provides the rights of access to basic water supply and sanitation, and environmentally, it provides for the protection of aquatic and associated ecosystems, the reduction and prevention of pollution and degradation of water resources.</p> <p>As this Act is founded on the principle that National Government has overall responsibility for and authority over water resource management, including the equitable allocation and beneficial use of water in the public interest, a person can only be entitled to use water if the use is permissible under the Act. Chapter 4 of the Act lays the basis for regulating water use.</p> <p>Also, should a water use license be required for the project, the National Water Act will be applicable in terms of obtaining the relevant license.</p>



<p>National Environmental Management: Waste Act (Act No. 59 of 2008)</p>	<p>National Department Environmental Affairs (DEA) (now known as the Department of Forestry, Fisheries and the Environment)</p>	<p>2008</p>	<p>NEMWA has been developed as part of the law reform process enacted through the White Paper on Integrated Pollution and Waste Management and the National Waste Management Strategy (NWMS). The objectives of the Act relate to the provision of measures to protect health, well-being and the environment, to ensure that people are aware of the impact of waste on their health, well-being and the environment, to provide for compliance with the measures, and to give effect to section 24 of the Constitution in order to secure an environment that is not harmful to health and well-being.</p> <p>Regulations No. R921 (of 2013) promulgated in terms of Section 19(1) of the National Environmental Management: Waste Act (59 of 2008) determines that no person may commence, undertake or conduct a waste management activity listed in this schedule unless a license is issued in respect of that activity. It is not envisaged that a waste permit will be required for the proposed development as no listed activities in terms of NEM:WA are expected to be triggered.</p>
<p>National Environment Management: Air Quality Act (Act No. 39 of 2004)</p>	<p>National Department Environmental Affairs (DEA) (now known as the Department of Forestry, Fisheries and the Environment)</p>	<p>2004</p>	<p>The object of this Act is to protect the environment by providing reasonable measures for the protection and enhancement of the quality of air in the Republic; the prevention of air pollution and ecological degradation; and securing ecologically sustainable development while promoting justifiable economic and social development.</p> <p>Regulations No. R248 (of 31 March 2010) promulgated in terms of Section 21(1)(a) of the National Environmental Management Act: Air Quality Act (39 of 2004) determine that an Atmospheric Emission License (AEL) is required for certain listed activities, which result in atmospheric emissions which have or may have a detrimental effect on the environment. The Regulation also sets out the minimum emission standards for the listed activities. It is not envisaged that an Atmospheric Emission License will be required for the proposed development.</p>
<p>The National Heritage Resources Act</p>	<p>South African Heritage Resources Agency (SAHRA)</p>	<p>1999</p>	<p>The Act aims to introduce an integrated and interactive system for the management of heritage resources, to promote good governance at all levels, and empower civil society to nurture and conserve heritage resources so that they may be bequeathed to future generations and to lay down principles for governing heritage resources management throughout the Republic. It also aims to establish the South African Heritage Resources Agency together with its Council to co-</p>



<p>(Act No. 25 of 1999)</p>		<p>ordinate and promote the management of heritage resources, to set norms and maintain essential national standards and to protect heritage resources, to provide for the protection and management of conservation-worthy places and areas by local authorities, and to provide for matters connected therewith.</p> <p>The Act protects and manages certain categories of heritage resources in South Africa. For the purposes of the Heritage Resources Act, a “heritage resource” includes any place or object of cultural significance. In this regard the Act makes provision for a person undertaking an activity listed in Section 28 of the Act to notify the resources authority. The resources authority may request that a heritage impact assessment be conducted if there is reason to believe that heritage resources will be affected.</p> <p>A case file has been opened on SAHRIS for the Luckhoff Solar 3 PV facility with case reference number 20141, and all relevant documents were submitted for their comments and approval. The Heritage Impact Assessment undertaken for the solar PV facility is included as Appendix E5, and the Palaeontological Impact Assessment is included as Appendix E6.</p>
<p>Conservation of Agricultural Resources Act (Act No. 85 of 1983)</p>	<p>National and Provincial Government</p>	<p>The objective of the Act is to provide control over the utilisation of the natural agricultural resources of the Republic in order to promote the conservation of the soil, the water sources and the vegetation and the combating of weeds and invader plants; and for matters connected therewith.</p> <p>Consent will be required from the Department of Agriculture, Forestry and Fisheries (now known as the Department of Forestry, Fisheries and the Environment) in order to confirm that the proposed development is not located on high potential agricultural land and to approve the long-term lease agreement.</p> <p>A Soils and Agricultural Compliance statement has been undertaken for the Luckhoff Solar 3 PV facility and is included as Appendix E4.</p>
<p>The National Forests Act, 1998 (Act 84 of 1998)</p>	<p>Department of Environmental Affairs (now known as the Department of</p>	<p>The purposes of this Act are to:</p> <ul style="list-style-type: none"> (a) promote the sustainable management and development of forests for the benefit of all; (b) create the conditions necessary to restructure forestry in State forests;



Forestry, Fisheries and the Environment)	<p>(c) provide special measures for the protection of certain forests and trees;</p> <p>(d) promote the sustainable use of forests for environmental, economic, educational, recreational, cultural, health and spiritual purposes.</p> <p>(e) promote community forestry;</p> <p>(f) promote greater participation in all aspects of forestry and the forest products industry by persons disadvantaged by unfair discrimination.</p>
	<p>Section 12(1) read with s15(1) of the NFA stated that the Minister may declare a particular tree, group of trees, woodland; or trees belonging to a particular species, to be a protected tree, group of trees, woodland or species. A list of protected tree species was gazetted in GN 635 of 6 December 2019. The effect of the declaration is that no person may (a) cut, disturb, damage or destroy; or (b) 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 license granted by the Minister; or in terms of an exemption published by the Minister in the Gazette.</p>
	<p>An Ecological Impact Assessment has been undertaken for the Luckhoff Solar 3 PV facility and is included in Appendix E1.</p>

3.3 POLICY CONTEXT

Table 3.2: Policy context for the construction of photovoltaic solar plants

POLICY	ADMINISTERING AUTHORITY	DATE	SUMMARY / IMPLICATIONS FOR PROPOSED DEVELOPMENT
The White Paper on the Energy Policy of the Republic of South Africa	Department of Mineral Resources and Energy	1998	<p>The White Paper on the Energy Policy of the Republic of South Africa establishes the international and national policy context for the energy sector, and identifies the following energy policy objectives:</p> <ul style="list-style-type: none"> • Increasing access to affordable energy services • Improving energy governance • Stimulating economic development



- Managing energy-related environmental and health impacts
- Securing supply through diversity
- Energy policy priorities

The White Paper sets out the advantages of renewable energy and states that Government believes that renewables can in many cases provide the least cost energy service, particularly when social and environmental costs are included. The White Paper acknowledges that South Africa has neglected the development and implementation of renewable energy applications, despite the fact that the country's renewable energy resource base is extensive, and many appropriate applications exist.

The White Paper notes that renewable energy applications have specific characteristics that need to be considered. Advantages include:

- Minimal environmental impacts in operation in comparison with traditional supply technologies; and
- 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.

The Luckhoff Solar 3 V facility is in line with this policy as it proposes the generation of renewable energy from the solar resource.

The White Paper on Renewable Energy Department of 2003
Mineral Resources and Energy

This White Paper on Renewable Energy supplements the *White Paper on Energy Policy*, which recognises that the medium and long-term potential of renewable energy is significant. This Paper sets out Government's vision, policy principles, strategic goals and objectives for promoting and implementing renewable energy in South Africa.

The White Paper notes that while South Africa is well-endowed with renewable energy resources that have the potential to become sustainable alternatives to fossil fuels, these have thus far remained largely



untapped. Government’s long-term goal is the establishment of a renewable energy industry producing modern energy carriers that will offer in future years a sustainable, fully non-subsidised alternative to fossil fuels. The medium-term (10-year) target set in the White Paper is: *10 000 GWh (0.8 Mtoe) renewable energy contribution to final energy consumption by 2013, to be produced mainly from biomass, wind, solar and small-scale hydro. The renewable energy is to be utilised for power generation and non-electric technologies such as solar water heating and bio-fuels. This is approximately 4% (1667 MW) of the projected electricity demand for 2013 (41539 MW)* (Executive Summary, ix).

The Luckhoff Solar 3 PV facility is in line with this paper as it proposes the generation of renewable energy from the solar resource.

<p>Integrated Resource Plan (IRP) for South Africa</p>	<p>Department of Mineral Resources and Energy</p>	<p>2010-2030</p>	<p>The Integrated Resource Plan for Electricity for South Africa of 2010–2030 (further referred to as the IRP) is a “living plan” which is expected to be revised and updated continuously as necessary due to changing circumstances. According to the Summary of the plan the current IRP for South Africa, which was originally initiated by the Department of Energy (DoE) in June 2010 (the Department is now known as Department of Mineral Resources and Energy), led to the Revised Balanced Scenarios (RBS) for the period 2010–2030.</p> <p><i>“This scenario was derived based on the 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”.</i> In addition to all existing and committed power plants, the RBS included 11,4 GW of renewables, which relates to the proposed Luckhoff Solar 3 PV facility. In 2010 several changes were made to the IRP model. The main changes in the IRP were the disaggregation of renewable energy technologies to explicitly display solar photovoltaic (PV), concentrated solar power (CSP), and wind options (RSA, 2011a).</p> <p>The summary of the IRP further explains that traditional cost-optimal scenarios were developed based on the previously mentioned changes in the IRP. This resulted in the Policy-Adjusted IRP, which stated that:</p> <p><i>“The installation of renewables (solar PV, CSP and wind) have been brought forward in order to accelerate a local industry; To account for the uncertainties associated with the costs of renewables and fuels, a nuclear fleet of 9,6 GW is included in the IRP; The emission constraint of the RBS (275 million tons of carbon dioxide per year after 2024) is maintained; and Energy efficiency demand-side management (EEDSM) measures are maintained at the level of the RBS”</i> (RSA, 2011a:6).</p>
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“The Policy-Adjusted IRP includes the same amount of coal and nuclear new builds as the RBS, while reflecting recent developments with respect to prices for renewables. In addition to all existing and committed power plants (including 10 GW committed coal), the plan includes 9,6 GW of nuclear; 6,3 GW of coal; 17,8 GW of renewables; and 8,9 GW of other generation sources” (RSA, 2011a:6).

The IRP highlights the commitments before the next IRP. The commitments pertaining to the purpose of the proposed project in renewable energy is: *“Solar PV programme 2012-2015: In order to facilitate the connection of the first solar PV units to the grid in 2012 a firm commitment to this capacity is necessary. Furthermore, to provide the security of investment to ramp up a sustainable local industry cluster, the first four years from 2012 to 2015 require firm commitment.”*

“Solar PV 2016 to 2019: As with wind, grid upgrades might become necessary for the second round of solar PV installations from 2016 to 2019, depending on their location. To trigger the associated tasks in a timely manner, a firm commitment to these capacities is necessary in the next round of the IRP at the latest. By then, the assumed cost decreases for solar PV will be confirmed” (IRP, 2011a:17).

In conclusion the IRP recommends that an accelerated roll-out in renewable energy options should be allowed with regards to the benefits of the localization in renewable energy technologies (RSA, 2011a). It is however important to take note that since the release of the IRP in 2011 there has been a number of developments in the energy sector of South Africa. Therefore, the IRP was updated and was open for comments until March of 2017. The new IRP of 2019 was formally published in October 2019. For the revision scenario, analysis was conducted. The results revealed that for the period ending 2030 that: *“The committed Renewable Energy Independent Power Producers Programme, including the 27 signed projects and Eskom capacity rollout ending with the last unit of Kusile in 2022, will provide more than sufficient capacity to cover the projected demand and decommissioning of plants up to approximately 2025”; “Imposing annual build limits on renewable energy will not affect the total cumulative capacity and the energy mix for the period up to 2030”; and “the scenario without renewable energy annual build limits provides the least-cost option by 2030” (RSA, 2018:34).*

Lastly, the draft IRP of 2018 also included the scenario analysis for the period post 2030. Here it was observed that: *“Imposing annual build limits on renewable energy will restrict the cumulative renewable installed capacity and the energy mix for this period; adopting no annual build limits on renewables or imposing a more stringent strategy to reduce greenhouse gas emissions implies that no new coal power*



plants will be built in the future unless affordable cleaner forms of coal-to-power are available; and the scenario without renewable energy annual build limits provides the least-cost option by 2050” (RSA, 2018:34–35).

In the final IRP of 2019 key considerations were taken into account together with required actions to be taken for the IRP of 2019 to be credible. In terms of renewable energy technologies like solar and wind, the IRP stated that *“The application of renewable build limits ‘smoothes out’ the capacity allocations for wind and solar PV which provides a constant pipeline of projects to investment; this addresses investor confidence”*. The decision stated against this key consideration is to *“retain the current annual build limits on renewables (wind and PV) pending the finalization of a just transition plan”* (RSA, 2019:46). Hereby the IRP also recognises renewable technologies’ potential to diversify the electricity mix, create new industries and job opportunities and localize across the value chain (RSA, 2019:13).

The Luckhoff Solar 3 PV facility is in line with this plan as it proposes the generation of renewable energy from the solar resource and will contribute to the energy mix of the country as set out in this plan.

**National
Development
Plan of 2030**

The Presidency: -
National
Planning
Commission

The National Development Plan aims to “eliminate poverty and reduce inequality by 2030” (RSA, undated). In order to eliminate or reduce inequality, the economy of South Africa needs to grow faster in order to benefit all South Africans. In May 2010 a draft national development plan was drafted, which highlighted the nine (9) key challenges for South Africa. The highest priority areas according to the plan are considered to be the creation of employment opportunities and to improve the quality of national education. In this regard, the plan sets out three (3) priority areas, namely, to raise employment by a faster growing economy, improve the quality of education, and to build the capability of the state in order to play a more developmental and transformative role. One of the key challenges identified was that the economy is unsustainably resource intensive and the acceleration and expansion of renewable energy was identified as a key intervention strategy to address this challenge.

The development of the Luckhoff Solar 3 PV facility will contribute to the intervention strategy as identified within the plan.



National Infrastructure Plan of South Africa	Presidential Infrastructure Coordinating Commission	2012	<p>In the year 2012 the South African Government adopted a National Infrastructure Plan (hereafter referred to as the Plan). The aim of this Plan is to transform the economic landscape, while strengthening the delivery of basic services and creating new employment opportunities. This Plan also supports the integration of African communities, and also sets out the challenges and enablers that our country needs in order to respond to the planning and development of infrastructure with regards to fostering economic growth (RSA, 2012). The Plan has developed eighteen (18) strategic integrated projects (further referred to as SIPs). These SIPs stretch over all nine (9) provinces, covering social and economic infrastructure, and projects that enhances development and growth. Of the eighteen (18), five (5) are geographically focused, three (3) spatial, three (3) energy, three (3) social infrastructure, two (2) knowledge, one (1) regional integration, and one (1) water and sanitation focussed. The three (3) SIPs according to the Plan, which are energy focused and correlate to the proposed project are as follow:</p> <ul style="list-style-type: none">- SIP 8: Green energy in support of the South African economy;- SIP 9: Electricity generation to support socio-economic development; and- SIP 10: Electricity transmission and distribution for all. <p>SIP 8 according to the Plan <i>“support sustainable green energy initiatives on a national scale through a diverse range of clean energy options as envisaged in the IRP 2010 and support bio-fuel production facilities”</i>. The purpose of SIP 9 according to the Plan is to <i>“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”</i>. SIP 9 should also monitor the implementation of major projects such as new power stations like Medupi, Kusile and Ingula. Lastly, SIP 10 aims to <i>“expand the transmission and distribution network to address historical imbalances, provide access to electricity for all and support economic development”</i> (RSA, 2012:20).</p> <p>The Luckhoff Solar 3 PV facility is in line with this plan as it proposes the generation of renewable energy from the solar resource which supports socio-economic development and will contribute to meeting the electricity demand of the country as set out in this plan.</p>
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New Growth Path Framework	Department of Economic Development -	2011	<p>The New Growth Path was developed after 16 years of South Africa’s democracy, to respond to emerging opportunities and risks while building on policies. This framework provides a dynamic vision on how to collectively achieve a more developed, equitable and democratic society and economy. This framework mainly reflects the commitment of the South African Government to create employment opportunities for its people in all economic policies (RSA, 2011b).</p> <p>This framework sets out the markers for job creation and growth and also identify where there are viable changes in the character and structure of production, in order to create a more inclusive, greener economy in the long-term. It is stated in the framework that in order for this framework to reach its objectives, the Government is committed to:</p> <ul style="list-style-type: none"> - Identify the possible areas of employment creation; and - Develop a policy to facilitate employment creation especially with regards to social equity, sustainable employment and growth in the creation of employment activities (RSA, 2011b). <p>This framework also identifies investments in five key areas, one of which is energy. This framework also states that the green economy is a priority area, which includes the construction of and investment in renewable energy technologies like solar (RSA, 2011b). In this regard it will also assist creating employment opportunities over the medium- and long-term.</p> <p>Considering that the construction of and investment in renewable energy is a key area identified within the framework, the Luckhoff Solar 3 PV facility is considered to be in-line with the framework.</p>
Climate Change Bill	National Department of Environmental Affairs (now known as the Department of Forestry, Fisheries and	2018	<p>On 08 June 2018 the Minister of Environmental Affairs published the Climate Change Bill (“the Bill”) for public comment. The Bill provides a framework for climate change regulation in South Africa aimed at governing South Africa’s sustainable transition to a climate resilient, low carbon economy and society. The Bill provides a procedural outline that will be developed through the creation of frameworks and plans. The following objectives are set within the Bill:</p> <ul style="list-style-type: none"> • Provide for the coordinated and integrated response to climate change and its impacts by all spheres of government in accordance with the principles of cooperative governance;



	the Environment)		<ul style="list-style-type: none"> • Provide for the effective management of inevitable climate change impacts through enhancing adaptive capacity, strengthening resilience and reducing vulnerability to climate change, with a view to building social, economic, and environmental resilience and an adequate national adaptation response in the context of the global climate change response; • Make a fair contribution to the global effort to stabilise greenhouse gas concentrations in the atmosphere at a level that avoids dangerous anthropogenic interference with the climate system within a timeframe and in a manner that enables economic, employment, social and environmental development to proceed in a sustainable manner. <p>The Luckhoff Solar 3 PV facility comprises a renewable energy generation facility and would not result in the generation or release of emissions during its operation.</p>
Climate Change Bill	National Department of Forestry, Fisheries and the Environment	2021	<p>The Department of Forestry, Fisheries and the Environment has published a new Climate Change Bill for public comment. The bill notes that climate change represents an urgent threat to human societies and the planet, and requires an effective, progressive and incremental response from both government and citizens.</p> <p>It recognises that South Africa has a global responsibility to reduce greenhouse gasses and that the anticipated impacts arising as a result of climate change have the potential to undermine achieving of the country's developmental goals.</p> <p>The main objective of the bill is to enable the development of an effective climate change response and the long-term, just transition to a climate-resilient and lower-carbon economy and society, and to provide for matters connected therewith.</p> <p>The Luckhoff Solar 3 PV facility comprises a renewable energy generation facility and would not result in the generation or release of emissions during its operation.</p>
Strategic Integrated Projects (SIPs)	The Presidential Infrastructure Coordinating Committee	2010 - 2030	<p>The Presidential Infrastructure Coordinating Committee (PICC) is integrating and phasing investment plans across 18 Strategic Infrastructure Projects (SIPs) which have five core functions: to unlock opportunity, transform the economic landscape, create new jobs, strengthen the delivery of basic services and support the integration of African economies. A balanced approach is being fostered through greening of the economy, boosting energy security, promoting integrated municipal infrastructure investment, facilitating</p>



integrated urban development, accelerating skills development, investing in rural development and enabling regional integration. SIP 8 and 9 of the energy SIPs supports the development of the solar energy facility:

- 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 – 2030) and supports bio-fuel production facilities.
- SIP 9: Electricity generation to support socio-economic development: The proposed Luckhoff Solar 3 PV facility is a potential SIP 9 Project as electricity will be generated and social and economic upliftment, development and growth will take place within the surrounding communities. It would become a SIP 9 project if selected as a Preferred Bidder project by the Department of Mineral Resources and Energy. SIP 9 supports the acceleration of the construction of new electricity generation capacity in accordance with the IRP 2010 to meet the needs of the economy and address historical imbalances.

The Luckhoff Solar 3 PV facility could be registered as a SIP project once selected as a preferred bidder under the REIPPP Programme. The project would then contribute to the above-mentioned SIPs

Strategic Environmental Assessment (SEA) for wind and solar PV Energy in South Africa

National Department of Environmental Affairs (now known as the Department of Forestry, Fisheries and the Environment)

2014

The then Department of Forestry, Fisheries and the Environment (DFFE) has committed to contribute to the implementation of the National Development Plan and National Infrastructure Plan by undertaking Strategic Environmental Assessments (SEAs) to identify adaptive processes that integrate the regulatory environmental requirements for Strategic Integrated Projects (SIPs) while safeguarding the environment. The wind and solar photovoltaic (PV) SEA were accordingly commissioned by DEA in support of SIP 8, which aims to facilitate the implementation of sustainable green energy initiatives.

This SEA identifies areas where large scale wind and solar PV energy facilities can be developed in terms of SIP 8 and in a manner that limits significant negative impacts on the environment, while yielding the highest possible socio-economic benefits to the country. These areas are referred to as Renewable Energy Development Zones (REDZs).

The REDZs also provide priority areas for investment into the electricity grid. Currently one of the greatest challenges to renewable energy development in South Africa is the saturation of existing grid infrastructure



and the difficulties in expanding the grid. Proactive investment in grid infrastructure is likely to be the most important factor determining the success of REDZs. Although it is intended for the SEA to facilitate proactive grid investment in REDZs, such investment should not be limited to these areas. Suitable wind and solar PV development should still be promoted across the country and any proposed development must be evaluated on its own merit.

The Luckhoff Solar 3 PV facility is not located within a REDZ, but the development will contribute to the expansion of renewable energy facilities and infrastructure within the country, and provide the positive opportunities associated with it.

Free State Provincial Spatial Development Framework (PSDF)
Free State Provincial Government
2012

The Free State PSDF is a policy document that promotes a ‘developmental state’ in accordance with national and provincial legislation and directives. It aligns with the Free State Provincial Growth and Development Strategy which has committed the Free State to ‘building a prosperous, sustainable and growing provincial economy which reduces poverty and improves social development’.

The PSDF includes comprehensive plans and strategies that collectively indicate which type of land-use should be promoted in the Province, where such land-use should take place, and how it should be implemented and managed. In broad terms, the PSDF:

- Indicates the spatial implications of the core development objectives of the Free State Provincial Growth and Development Strategy.
- Serves as a spatial plan that facilitates local economic development.
- Lays down strategies, proposals and guidelines as it relates to sustainable development.
- Facilitates cross-boundary co-operation between municipalities, adjoining provinces, and bordering countries.
- Serves as a manual for integration and standardisation of the planning frameworks of all spheres of government in the Province.

The Free State Provincial Growth and Development Strategy states that sustainable economic development is the only effective means by which the most significant challenge of the Free State, namely poverty, can be addressed. The PSDF gives practical effect to sustainable development, which is defined



as development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs.

The PSDF is prepared in accordance with bioregional planning principles that were adapted to suit the site-specific requirements of the Free State. It incorporates and complies with the relevant protocols, conventions, agreements, legislation and policy at all applicable levels of planning, ranging from the international to the local.

The PSDF builds upon achievements and learns from mistakes of the past, reacts to the challenges of our time, incorporates the traditional knowledge of the people of the Free State, and builds upon international best-practice and technology.

The development of the Luckhoff Solar 3 PV facility is in-line with the framework based on the contributions and opportunities presented by a development of this nature.

Xhariep District Municipality Integrated Development Plan (IDP)

Xhariep District Municipality

2021

The long-term vision of the Xhariep DM is to be: *“A community-oriented municipality, with a sustainable environment for business and economic opportunities”*.

The key words and phrases in the vision must be interpreted as follows:

- Municipality: A municipality consists of the political structures, the administration and the community.
- Community: A social group of any size whose members reside in a specific locality, share government, and often have a common cultural and historical heritage.
- Sustainable: That "meets the needs of the present without compromising the ability of future generations to meet their own needs". It rests on three "pillars" i.e., economic development, social development and environmental protection.
- Opportunities: To make possible or easy. Enabling environments are those where participants feel safe enough to develop relationships and to share experiences.



In order to support the vision statement, the Municipality has identified a mission statement. The Mission statement of the municipality is therefore:

- *“To facilitate and support local municipalities, by promoting a healthy and conducive environment in our communities by ensuring that we deliver on our core functions.*
- *To promote an inclusive society through social/cultural events.*
- *To promote local economic development, by creating sustainable markets for local producers.*
- *To ensure a sound Political and Administrative Leadership”.*

The development of the Luckhoff Solar 3 PV facility will contribute to the goals of the area, albeit to a limited extent.

Letsemeng Local Municipality Integrated Development Plan (IDP)	Letsemeng Local Municipality	2021/22	<p>As per the IDP <i>“Our approach shall continue to be informed by the commitment of the Municipality to the five Pillars of Back to Basics strategies namely;</i></p> <ul style="list-style-type: none"> - <i>Putting people and their concerns first;</i> - <i>Creating conditions for decent living;</i> - <i>Demonstrating good governance;</i> - <i>Ensuring sound financial management; and</i> - <i>Building and maintaining sound institutional and administrative capabilities;”</i> <p>The development of the Luckhoff Solar 3 PV facility will contribute to the goals of the area, albeit to a limited extent.</p>
Letsemeng Spatial Development Framework 2019/2020 (SDF) (2018)	Letsemeng SDF	2019/2020	<p>Spatial Development Frameworks and policies at all spheres of government must address the inclusion of persons and areas that were previously excluded, with an emphasis on informal settlements, former homeland areas and areas characterised by widespread poverty and deprivation.</p> <p>The Spatial Development Framework (SDF) supports the Letsemeng Vision as indicated in the IDP document and is intended to promote an urban form that will deliver the long-term vision for Letsemeng.</p>



The main purpose of the current SDF is to create a town that is sustainable, accessible and efficient. The following objective will ensure that the municipality succeeds in their main purpose.

- Objective 1: To create sustainable human settlement with quality physical, economic and social environments;
- Objective 2: To encourage land reform towards more intensive land uses;
- Objective 3: To encourage urban and regional integration and rectification of past imbalances;
- Objective 4: To create a sustainable local land use management system;
- Objective 5: Support Local Economic Development Opportunities;
- Objective 6: Manage Informal settlements;
- Objective 7: Manage development to ensure environmental sustainability;
- Objective 8: Promote regional connectivity.

The Spatial Development Framework needs to be indicative and therefore there is a need to adopt a set of structuring elements that can give future structure to the urban and rural form of the municipal area. Six (6) spatial structuring elements have been identified; with the main purpose of these structuring elements being:

- To ensure that the SDF achieves the desired urban form;
- To link spatial objectives with clear implementation strategies;
- To ensure that infrastructure is carefully planned;
- Policy and institutional instruments are in place;
- Growth is appropriately managed;
- To ensure that all relevant sectors are aligned to the plan;

The above can be achieved by implementing an effective growth management approach, which steers development to achieve the desired spatial and developmental outcomes. Growth management is a multi-sectoral concept that should be reflected in an integrated management system which relies on the contributions of all service providers in the area.



The development of the Luckhoff Solar 3 PV facility will contribute to the goals of the area, albeit to a limited extent.

3.4 OTHER LEGISLATION

Other legislation mainly refers to the following:

- Planning legislation governing the rezoning process and approval of the layout plan.
- Design standards and legislation for services provision such as water, sewerage, electricity, etc.
- Municipal bylaws related to building plans, building regulations, etc.

3.5 RELEVANT GUIDANCE

The following guidance was considered in conducting the EIA:

- The Equator principles III (2013)¹
- World Bank Group Environmental, Health and Safety General Guidelines (EHS Guidelines) (2007)
- Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution (2007)
- International Finance Corporation's Policy on Environmental and Social Sustainability (2012)
- DEA. (2013). Draft National Renewable Energy Guideline. Department of Environmental Affairs, Pretoria, South Africa
- DEA, (2012), Guideline 5 – Final companion to the National Environmental Management Act (NEMA) Environmental Impact Assessment (EIA) Regulations of 2010
- DEA, (2012), Guideline 7 – Public participation in the Environmental Impact Assessment process
- DEA, (2012), Guideline 9 – Need and desirability
- DEA, (2006), Guideline 3 – General guide to the Environmental Impact Assessment Regulations
- DEAT, (2006), Guideline 4 – Public participation in support of the Environmental Impact Assessment Regulations
- DEAT, (2006), Guideline 5 – Assessment of alternatives and impacts in support of the Environmental Impact Assessment Regulations

¹ Although this report is not written in terms of the Equator Principles (EPs), it fully acknowledges that the EPs will need to be complied with should funding for the project be required.

- BirdLife, (2017). Best Practise Guidelines Birds & Solar Energy: Guidelines for assessing and monitoring the impact of solar power generating facilities on bird in southern Africa.

3.6 CONCLUSION

The S&EIR process is being undertaken in accordance with the EIA Regulations (as amended) published in GNR 326, in terms of Section 24(5) and 44 of the NEMA as amended as well as all relevant National legislation, policy documents, national guidelines, the World Bank EHS Guidelines, the IFC Performance Standards, and the Equator Principles.

The legislative and policy context plays an important role in identifying and assessing the potential social impacts associated with the proposed development, as well as an indication of the need and desirability of the proposed development from a national, provincial and local level. For this reason, the proposed development project will be assessed in terms of its fit with the key legislative, policy and planning documents discussed above.

The main findings of the review of the policy documents on all spheres of Government indicated that strong support was given towards renewable energy, specifically PV solar energy and therefore it is concluded that there is support for the development of the Luckhoff Solar 3 PV facility. The White Paper on the Energy Policy of the Republic of South Africa of 1998 stated that due to the fact that renewable energy resources operate from an unlimited resource base, i.e., the sun, renewable energy can increasingly contribute towards a long-term sustainable energy supply for future generations. This policy further highlights that due to the unlimited resources base of renewable energy in South Africa, renewable energy applications, like PV solar energy and associated infrastructure, are more sustainable in terms of social and environmental costs. The Integrated Resource Planning for Electricity for South Africa of 2010–2030, the National Infrastructure Plan of South Africa and the New Growth Path Framework all support the development of the renewable energy sector. In particular, the IRP also indicated that 43% of the energy generation in South Africa is allocated to renewable energy applications. On a District and Local level limited attention is given explicitly to renewable sources like PV solar energy, however the documents reviewed do make provision for such developments and efficiency in improving the quality of lives in terms of efficient physical infrastructure as well as socio-economic growth. At Provincial, District and Local level the policy documents support the applications of renewables.

The review of the relevant policies and documents related to the energy sector therefore indicate that renewables, like solar energy and the establishment of solar energy facilities and associated infrastructure, are supported on all spheres of Government. The proposed Luckhoff Solar 3 PV facility is therefore supported by the related policy and planning documents reviewed in this section of the report.

4 THE NEED AND DESIRABILITY

This section aims to address the following requirements of the regulations:

Appendix 2. (2) A scoping report (...) must include – (f) a motivation for the need and desirability of the activity in the context of the preferred location.

4.1 THE NEED FOR THE PROPOSED ACTIVITY

The proposed activity is a direct result of the growing demand for electricity and the need for renewable energy in South Africa. According to Eskom, the demand for electricity in South Africa has been growing at approximately 3% per annum. This growing demand, fuelled by increasing economic growth and social development, is placing increasing pressure on South Africa's existing power generation capacity. Coupled with this, is the growing awareness of environmentally responsible development, the impacts of climate change and the need for sustainable development.

Over 90% of South Africa's electricity generation is coal based, the World bank estimates that this results in an annual, per capita carbon emission of ~8.9 tons per person. Based on 2008 fossil-fuel CO₂ emissions statistics released by the Carbon Dioxide Information Analysis Centre, South Africa is the 13th largest carbon dioxide emitting country in the world and the largest emitter in Africa (Boden, et al. 2011). In August 2021 an article confirmed that South Africa is the 12th highest greenhouse gas emitter in the world (source: <https://www.news24.com/fin24/economy/eskom-will-only-able-to-meet-global-air-quality-standards-by-2050-owing-to-financial-woes-20210818>).

The proposed project is intended to form part of the Department of Mineral Resources and Energy's (DMREs) Renewable Energy Independent Power Producer Procurement (REIPPP) Programme or any other appropriate energy generation programmes / opportunities. The REIPPP Programme aims to secure 14 725 Megawatts (MW) of new generation capacity from renewable energy sources, while simultaneously diversifying South Africa's electricity mix. According to the 2021 State of the Nation Address, Government will soon be initiating the procurement of an additional 11 800 MW of power from renewable energy, natural gas, battery storage and coal in line with the Integrated Resource Plan 2019 and fulfilling their commitments under the United Nations Framework Convention on Climate Change and its Paris Agreement which include the reduction of greenhouse gas emissions. Eskom, the largest greenhouse gas emitter of South Africa, has committed in principle to net zero emission by 2050 and to increase its renewable capacity. During the 2022 State of the Nation Address it was indicated that during the past year the government had taken "firm steps" to bring additional generation capacity online as quickly as possible to close the shortfall in terms of electricity. As a result, it was confirmed that several new generation projects will be coming online over the next few years.

Besides capacity additions, several assumptions have changed since the promulgation of IRP 2010–2030. Key assumptions that changed include the electricity demand projection, Eskom's existing plant performance, as well as new technology costs. These changes necessitated the review and update of the IRP which resulted in the draft IRP 2018 as per table 4.1 below:

Table 4.1: Published Draft IRP 2018 (Approved by Cabinet for Consultation)

	Coal	Nuclear	Hydro	Storage (Pumped Storage)	PV	Wind	CSP	Gas / Diesel	Other (CoGen, Biomass, Landfill)	Embedded Generation
2018	39 126	1 860	2 196	2 912	1 474	1 980	300	3 830	499	Unknown
2019	2 155					244	300			200
2020	1 433				114	300				200
2021	1 433				300	818				200
2022	711				400					200
2023	500									200
2024	500									200
2025					670	200				200
2026					1 000	1 500		2 250		200
2027					1 000	1 600		1 200		200
2028					1 000	1 600		1 800		200
2029					1 000	1 600		2 850		200
2030			2 500		1 000	1 600				200
TOTAL INSTALLED	33 847	1 860	4 696	2 912	7 958	11 442	600	11 930	499	2600
Installed Capacity Mix (%)	44.6	2.5	6.2	3.8	10.5	15.1	0.9	15.7	0.7	
<p> Installed Capacity Committed / Already Contracted Capacity New Additional Capacity (IRP Update) </p>										

According to the South African Energy Sector Overview (2021), there is currently 1 723MW of installed PV capacity, while an additional 2 600MW and 860MW from wind and solar has been rewarded as part of Bid window 5 and 6, respectively (latter announced in 2022).

4.2 THE DESIRABILITY OF THE PROPOSED ACTIVITY

The facility's contribution towards sustainable development and the associated benefits to society in general is discussed below:

- Lesser dependence on fossil fuel generated power - The deployment of the facility will have a positive macro-economic impact by reducing South Africa's dependence on fossil fuel generated power and assisting the country in meeting its growing electricity demand.
- Increased surety of supply - By diversifying the sources of power in the country, the surety of supply will increase. The power demands of South Africa are ever increasing and by adding solar power this demand can be met, even exceeded without increasing pollution in relation to the use of fossil fuels. The project has the potential of "securing" economic activity by assisting in removing supply constraints if Eskom generation activities result in a supply shortfall. When supply is constrained, it represents a limitation to economic growth. When a supply reserve is available, it represents an opportunity for economic growth.
- Local economic growth - The proposed project will contribute to local economic growth by supporting industry development in line with provincial and regional goals and ensuring advanced skills are drawn to the Free State Province. The project will likely encounter widespread support from government, civil society and businesses, all of whom see potential opportunities for revenues, employment and business

opportunities locally. The development of the photovoltaic solar facility will in turn lead to growth in tax revenues for local municipalities and sales of carbon credits, resulting in increased foreign direct investment. The location of the proposed development within the Xhariep District Municipality is desirable since 41,9% of households within the Municipality live within the poverty level with an income of less than R30 000 or less per annum (Xhariep SDF, 2010-2011).

- Lower costs of alternative energy - An increase in the number of solar facilities commissioned will eventually reduce the cost of the power generated through solar facilities. This will contribute to the country's objective of utilising more renewable energy and less fossil fuel-based power sources. It will assist in achieving the goal to generate 14 725 MW of electricity from renewable energy as per the Renewable Energy Independent Power Producer Procurement (REIPPP) Programme of the Department of Mineral Resources and Energy. The Government will be initiating the procurement of an additional 11 800 MW of renewable energy as stated during the 2021 State of the Nation Address.
- Reduction in greenhouse gas emissions - The additional power supplied through solar energy will reduce the reliance on the combustion of fossil fuels to produce power. The South African electricity grid is predominantly coal-fired and therefore GHG emissions intensive (coal accounts for more than 92% of the fuel used in South Africa's electricity generation). The reduction of GHG emissions as a result of the project implementation will be achieved due to reduction of CO₂ emissions from combustion of fossil fuel at the existing grid-connected power plants and plants which would likely be built in the absence of the project activity.
- CDM Project - A solar energy facility also qualifies as a Clean Development Mechanism (CDM) project (i.e., a financial mechanism developed to encourage the development of renewable technologies).
- Climate change mitigation - On a global scale, the project makes a contribution to greenhouse gas emission reduction and therefore contributes toward climate change mitigation.
- Reduced environmental impacts - The reduction in non-renewable electricity consumed from the grid will not only result in a reduction in greenhouse gas emissions, but also the prevention of negative impacts associated with coal mining. For example, coal power requires high volumes of water, in areas of South Africa where water supply is already over-stretched and water availability is highly variable. Photovoltaic solar energy technology also does not produce the sulphur emissions, ash or coal mining concerns associated with conventional coal fired electricity generation technologies resulting in a relatively low level of environmental impacts. It is a clean technology which contributes toward a better-quality environment for employees and nearby communities.
- Social benefits - The project activity is likely to have significant long-term, indirect positive social impacts that may extend to a regional and even national scale. The larger scale impacts are to be derived in the utilization of solar power and the experience gained through the construction and operation of the power plant. In

future, this experience can be employed at other similar solar installations in South Africa.

- Provision of job opportunities - The main benefit of the proposed development operating in the area is that local companies or contractors will be hired for the duration of the construction period. The operational phase will provide permanent job opportunities to the local communities from the surrounding area since security guards and general labourers will be required on a full-time basis. Approximately 800 employment opportunities will be created during the construction and operational phases.
- Indirect socio-economic benefits - The increase in the demand for services such as accommodation, transportation, security, general maintenance and catering will generate additional indirect socio-economic benefits for the local community members.
- Effective use of resources - Because of predominantly the climate and soil limitations, the site is totally unsuitable for cultivated crops, and the viable agricultural land use is limited to grazing only. The proposed development in this specific area will generate alternative land use income through rental for the proposed energy facility, which will have a positive impact on agriculture. It will provide the farming enterprise with increased cash flow and rural livelihood, and thereby improve the financial sustainability of agricultural activities.
- Increased access to electricity: According to the Letsemeng LM IDP, the national electricity crises of 2010 and the resultant effects on South African residents and the economy has highlighted how highly reliant we are on electricity as a source of energy. Government has committed to developing measures to promote energy saving, reduce energy costs to the economy, and reduce the negative impact of energy use on the environment.
- Cumulative impacts of low to medium significance – No cumulative impacts with a high residual risk have been identified. In terms of the desirability of the development of sources of renewable energy therefore, it may be preferable to incur a higher cumulative loss in such a region as this one, than to lose land with a higher environmental value elsewhere in the country.

5 DESCRIPTION OF ENVIRONMENTAL ISSUES

This section aims to address the following requirements of the regulations:

Appendix 2. (2) A scoping report (...) must include-

(h) a full description of the process followed to reach the proposed preferred activity, site and location of the development footprint within the site, including –

(i) details of all the alternatives considered;

(ii) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;

(iii) 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.

(iv) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;

(ix) the outcome of the site selection matrix;

(x) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such and

(xi) a concluding statement indicating the preferred alternatives, including preferred location of the activity;

5.1 CONSIDERATION OF ALTERNATIVES

The DEAT 2006 guidelines on ‘assessment of alternatives and impacts’ proposes the consideration of four types of alternatives namely, the no-go, location, activity, and design alternatives. It is, however, important to note that the regulation and guidelines specifically state that only ‘feasible’ and ‘reasonable’ alternatives should be explored. It also recognizes that the consideration of alternatives is an iterative process of feedback between the developer and EAP, which in some instances culminates in a single preferred project proposal.

An initial site assessment (refer to Appendix D) was conducted by the developer on Farm Vijeboom No. 714, Farm Rorich’s Hulp No. 505, Farm Klein Palmietfontein No. 370, and Farm De Dorpsgronden Van Luckhoff No. 577, and the farms were found favorable due to its close proximity to grid connections, solar radiation, ecology and relative flat terrain. Where specific features of environmental sensitivity are identified by the independent specialists as part of the Scoping Phase, these areas and the associated required buffers will be considered by the developer to ensure that the facility layout is appropriate considering the sensitive features present. The site selection also took the site geology, land capability, water availability and land use into consideration before deciding on the specific site within the affected property.

The following sections explore different types of alternatives in relation to the proposed activity in more detail.

5.1.1 No-go alternative

This alternative considers the option of ‘do nothing’ and maintaining the status quo of the affected environment. The description provided in section 5.3 of this report could be considered the baseline conditions (*status quo*) to persist should the no-go alternative be preferred. The site is currently zoned for agricultural and mining land uses. Should the proposed activity not proceed, the site will remain unchanged and will continue to be used for the current land uses present. The area associated with the development footprint has limited agricultural potential and is unsuitable for cultivation, with grazing considered to be the only agricultural option. The potential opportunity costs in terms of alternative land use income through rental for the energy facility and the supporting social and economic development in the area would be lost if the *status quo* persists.

5.1.2 Location alternatives

This alternative asks the question, if there is not, from an environmental perspective, a more suitable location for the proposed activity. No other properties have at this stage been secured by Luckhoff Solar 3 (Pty) Ltd in the Luckhoff area to potentially establish the Luckhoff Solar 3 PV facility. From a local perspective Farm Vijeboom No. 714, Farm Rorich’s Hulp No. 505, Farm Klein Palmietfontein No. 370, and Farm De Dorpsgronden Van Luckhoff No. 577, are preferred due to its suitable climatic conditions, topography (i.e., in terms of slope), environmental conditions (i.e., agricultural potential and archaeology), proximity to a grid connection point (i.e., for the purpose of electricity evacuation), as well as site access (i.e., to facilitate the movement of machinery, equipment, infrastructure and people during the construction phase).

Based on the above site-specific attributes, the study area is considered to be highly preferred in terms of the development of a solar PV facility. As such, no property / location alternatives will be considered. Refer to Figure 5.1.

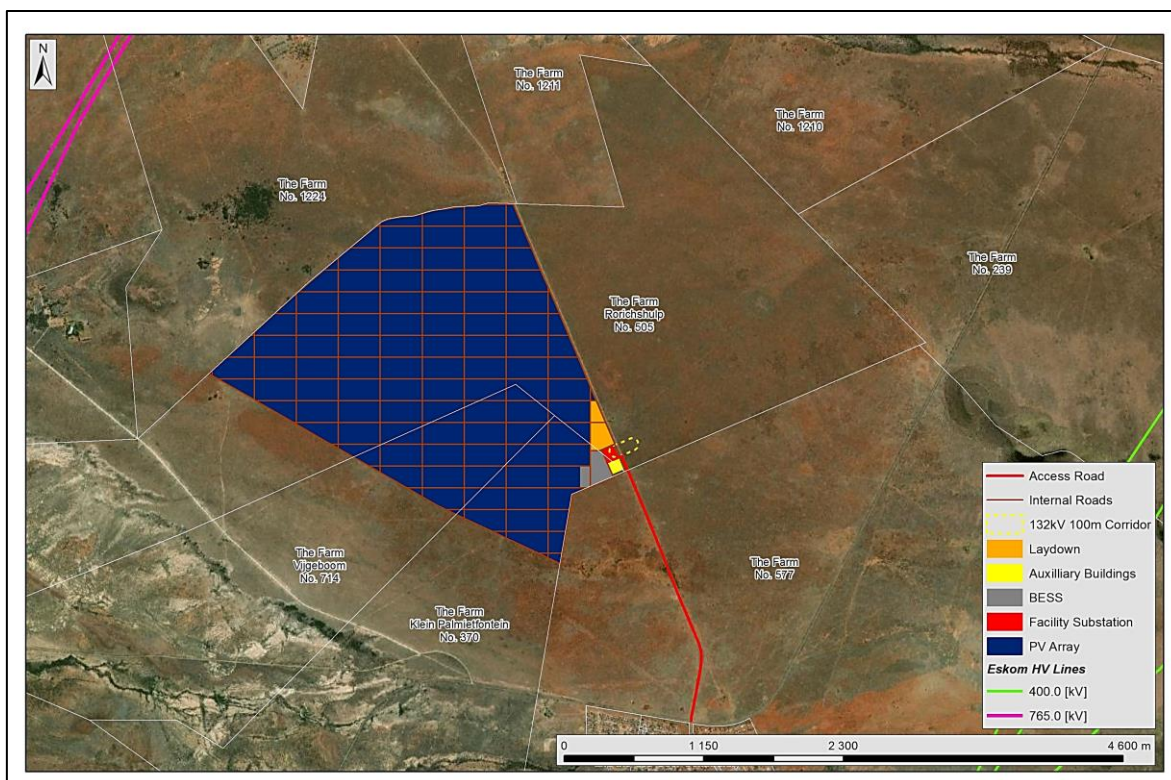


Figure 5.1: Location of the single preferred property alternative.

5.1.3 Activity alternatives

The scoping process also needs to consider if the development of a solar PV facility would be the most appropriate land use for the particular site.

- Photovoltaic (PV) solar facility – Luckhoff Solar 3 (Pty) Ltd is part of a portfolio of solar PV projects throughout South Africa.
- Wind energy facility - Due to the local climatic conditions a wind energy facility is not considered suitable as the area does not have the required wind resource. Furthermore, the applicant has opted for the generation of electricity via solar power rather than the use of wind turbines based on the renewable energy resource available for the area. This alternative is therefore regarded as not feasible and will not be evaluated further in this report.
- Concentrated solar power (CSP) technology - CSP technology requires large volumes of water, and this is a major constraint for this type of technology considering the water challenges and limitation experienced not only in the country but also within the local area. While the irradiation values are high enough to generate sufficient solar power, the water constraints render this alternative not feasible. It must also be noted that the IRP no longer includes the use of CSP as part of the energy mix of the country. Therefore, this alternative will not be considered further in this report.

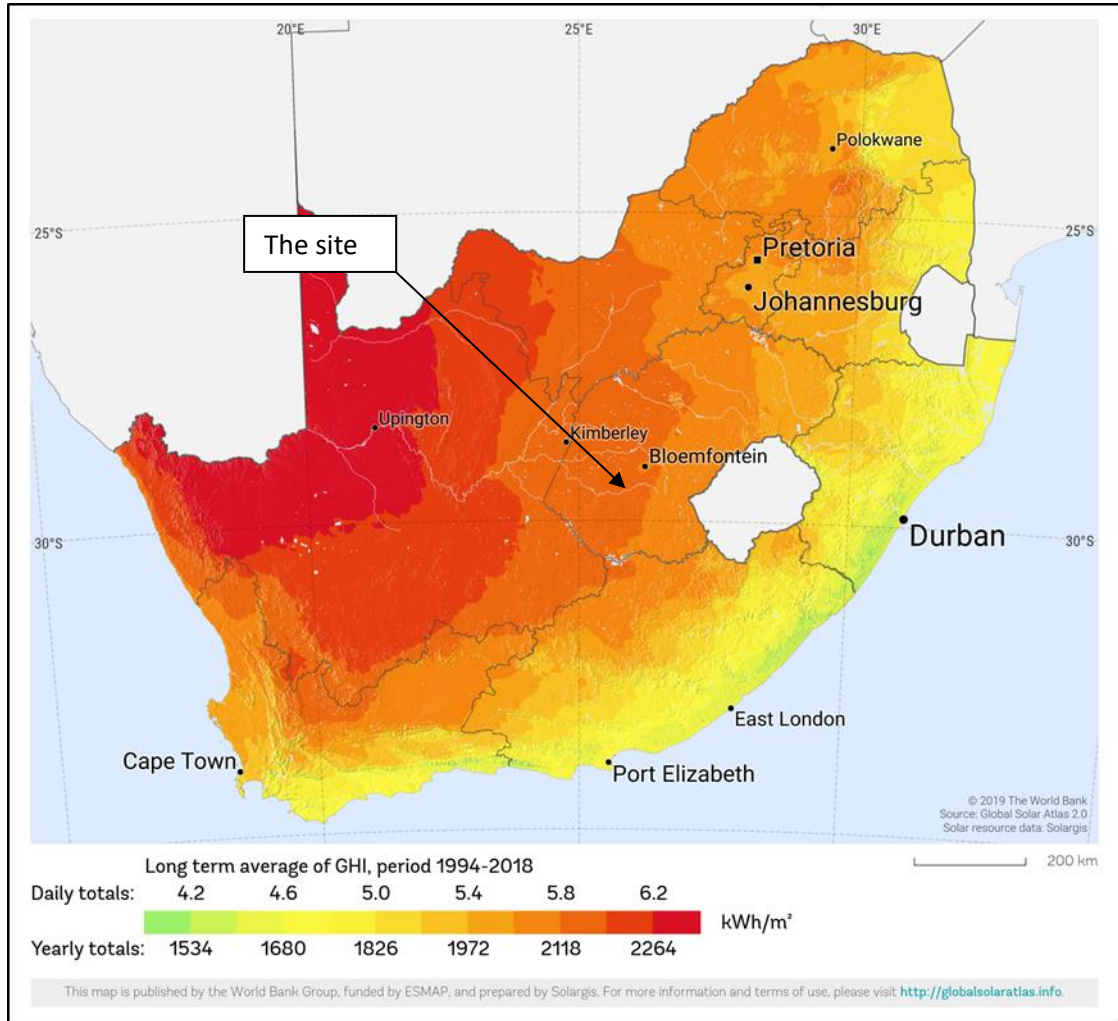


Figure 5.2: Global horizontal irradiation values for South Africa (Solar GIS, 2021) and the Luckhoff Solar 3 PV facility development footprint.

5.1.4 Design and layout alternatives

Design alternatives were considered throughout the planning and design phase (i.e., what would be the best design option for the development?). In this regard discussions on the design were held between the EAP and the developer, which also included the consideration of sensitive environmental areas and features present as identified by the independent specialists that needs to be avoided by the placement of infrastructure. The draft layout plan is included as Appendix G, but it should be noted that the final layout plan will be submitted as part of the EIA Report.

The draft layout follows the limitations of the site and aspects such as environmental sensitive areas (supported by specialist input), areas under cultivation, roads, fencing and servitudes are considered. The total surface area proposed for layout options include the PV panel arrays spaced to avoid shadowing, access and maintenance roads and associated infrastructure (buildings, power inverters, power lines, BESS and perimeter fences). With regards to the structure orientation, the panels will either be fixed to a single-axis horizontal tracking structure where the orientation of the panel varies according to the time of the day, as the

sun moves from east to west or tilted at a fixed angle equivalent to the latitude at which the site is located in order to capture the most sun.

Note: It is customary to develop the final/detailed construction layout of the solar PV facility only once an Independent Power Producer (IPP) is awarded a successful bid under the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) or an alternative programme, after which major contracts are negotiated and final equipment suppliers identified.

For the purpose of the Environmental Impact Assessment (EIA), site layout alternatives will not be comparatively assessed, but rather a single layout will be refined as additional information becomes available throughout the EIA process (e.g., specialist input, additional site surveys, ongoing stakeholder engagement).

The development area presented in the Scoping Report has been selected as a practicable option for the facility, considering technical preference and constraints, as well as initial No-Go layers informed by specialist site surveys.

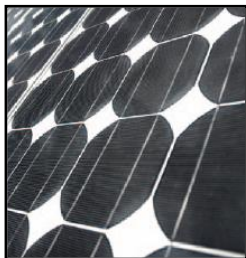
Following further site screening by the specialists (scheduled to take place during the EIA phase), the development footprint will be finalised for impact assessment.

5.1.5 Technology alternatives

There are several types of semiconductor technologies currently available and in use for PV solar panels. Two, however, have become the most widely adopted, namely crystalline silicon and thin film. These technologies are discussed in more detail below:

- Crystalline (high efficiency technology at higher cost):

Crystalline silicon panels are constructed by first putting a single slice of silicon through a series of processing steps, creating one solar cell. These cells are then assembled together in multiples to make a solar panel. Crystalline silicon, also called wafer silicon, is the oldest and the most widely used material in commercial solar panels. Crystalline silicon modules represent 85-90% of the global annual market today. There are two main types of crystalline silicon panels that can be considered for the solar facility:



- Mono-crystalline Silicon - mono-crystalline (also called single crystal) panels use solar cells that are cut from a piece of silicon grown from a single, uniform crystal. Mono-crystalline panels are among the most efficient yet most expensive on the market. They require the highest purity silicon and have the most involved manufacturing process.



- Poly-crystalline Silicon – poly-crystalline panels use solar cells that are cut from multifaceted silicon crystals. They are less uniform in appearance than mono-crystalline cells, resembling pieces of shattered glass. These are the most common solar panels on the market, being less expensive than mono-crystalline silicon. They are also less efficient, though the performance gap has begun to close in recent years (First Solar, 2011).

- Thin film (low-cost technology with lower efficiency):

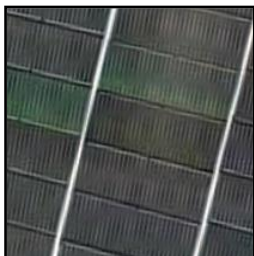
Thin film solar panels are made by placing thin layers of semiconductor material onto various surfaces, usually on glass. The term *thin film* refers to the amount of semiconductor material used. It is applied in a thin film to a surface structure, such as a sheet of glass. Contrary to popular belief, most thin film panels are not flexible. Overall, thin film solar panels offer the lowest manufacturing costs, and are becoming more prevalent in the industry. Thin films currently account for 10-15% of global PV module sales. There are three main types of thin film used:



- Cadmium Telluride (CdTe) - CdTe is a semiconductor compound formed from cadmium and tellurium. CdTe solar panels are manufactured on glass. They are the most common type of thin film solar panel on the market and the most cost-effective to manufacture. CdTe panels perform significantly better in high temperatures and in low-light conditions.



- Amorphous Silicon - Amorphous silicon is the non-crystalline form of silicon and was the first thin film material to yield a commercial product, first used in consumer items such as calculators. It can be deposited in thin layers onto a variety of surfaces and offers lower costs than traditional crystalline silicon, though it is less efficient at converting sunlight into electricity.



- Copper, Indium, Gallium, Selenide (CIGS) - CIGS is a compound semiconductor that can be deposited onto many different materials. CIGS has only recently become available for small commercial applications, and is considered a developing PV technology (First Solar, 2011).

- Bifacial panels:

As the name suggests, bifacial solar panels have two faces, or rather, they can absorb light from both sides of the panel. A lot of potential energy transfer is lost in traditional solar cells when the light hits the back of a solar panel. Most bifacial solar panels use monocrystalline cells, whereas traditional cells use polycrystalline

materials. The monocrystalline materials, alongside the clear light pathway on both sides of the panel, enable the light to be absorbed from either side of the cell, and it is thought that the overall efficiency of these cells can be up to 30% greater in commercial applications. Although, the exact amount is variable depending on the surface that they are installed on. The front side of the solar panel still absorbs most of the solar light, but the back side of the solar panel can absorb between 5-90% of the light absorbed by the front of the solar panel. Refer to Figure 5.3.

Traditional solar panels use an opaque back sheet. By comparison, bifacial solar panels either have a clear/reflective back sheet or have dual panes of glass. Most of these solar panels are frameless so any issues with potential-induced degradation (PID) are reduced. To efficiently convert light into electricity from both sides, bifacial solar cells have selective-area metallization schemes that enable light to pass between the metallized areas, rather than the conventional thick metal collectors as seen with monofacial solar panels.

The technology that (at this stage) proves to be most feasible and reasonable with respect to the proposed solar facility is crystalline silicon panels, due to it being non-reflective, more efficient, and with a higher durability. However, due to the rapid technological advances being made in the field of solar technology the exact type of technology to be used, such as bifacial panels, will only be confirmed at the onset of the project.

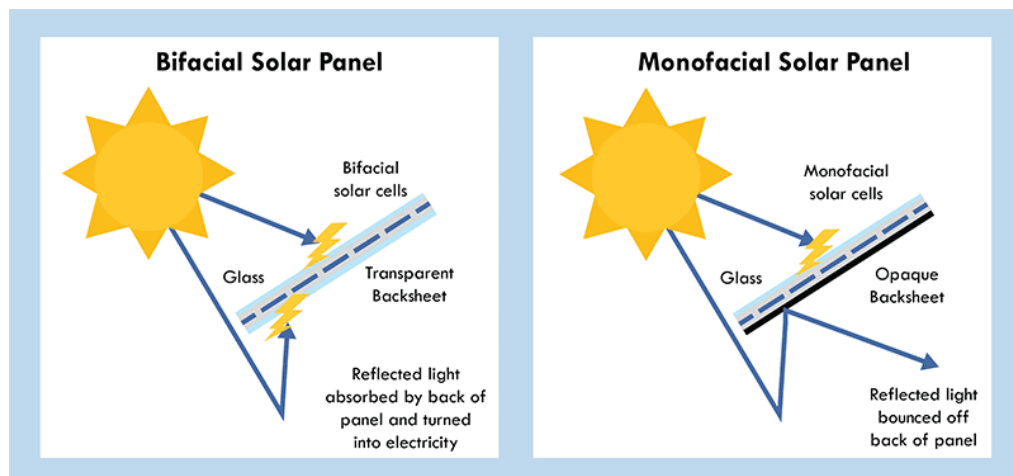


Figure 5.3: Bifacial vs Monofacial Solar Panel absorption.

5.2 PUBLIC PARTICIPATION PROCESS

The following sections provide detailed information on the public participation process conducted in terms of Regulations 39 to 44.

5.2.1 General

The public participation process was conducted strictly in accordance with Regulations 39 to 44. The following three categories of variables were taken into account when deciding the required level of public participation:

- The scale of anticipated impacts;
- The sensitivity of the affected environment and the degree of controversy of the project; and
- The characteristics of the potentially affected parties.

Since the scale of anticipated impacts is low, the general land use of the area is related to mining and agriculture, the limited environmental sensitivity of the site and the fact that no conflict was foreseen between potentially affected parties, no additional public participation mechanisms are considered at this stage of the process. The following actions have already been undertaken:

➤ Newspaper advertisement

Since the proposed development is unlikely to result in any impacts that extend beyond the municipal area where it is located, it was deemed sufficient to advertise in a local newspaper. An advertisement was placed in the Bloemnuus on 13 October 2022 (see Appendix C2) notifying the public of the S&EIR process and requesting Interested and Affected Parties (I&APs) to register with, and submit their comments to Environamics Environmental Consultants. I&APs were given the opportunity to raise comments within 30 days of the advertisement.

➤ Site notices

Site notices were erected on site on 6 October 2022 informing the public of the commencement of the S&EIR process. Photographic evidence of the site notices is included in Appendix C3.

➤ Direct notification of identified I&APs

Identified I&APs, including key stakeholders representing various sectors, has been directly informed of the S&EIR process via registered post, telephone calls, WhatsApps and emails (as relevant). The Background Information Document (BID) was distributed with the notification. For a complete list of I&APs with their contact details see Appendix C4 to this report.

➤ Direct notification of surrounding landowners and occupiers

Written notices were also provided via registered post, WhatsApp or email (as relevant) to all surrounding landowners and occupiers.

➤ Circulation of Draft Scoping Report

Copies of the draft Scoping report has been provided to all I&APs via courier, Dropbox and/or email (as relevant). Hard copies of the report will be made available on request and where an I&AP does not have the resources to view the report on an online platform.

5.2.2 Consultation process

Regulation 41 requires that the landowner, surrounding landowners, municipality, relevant ward councillor, any organ of state having jurisdiction in respect of any aspect of the activity should be given written notice of the activity. A complete list of all the consultees who

received written notice as well as proof of correspondence is attached as Appendices C4 and C5.

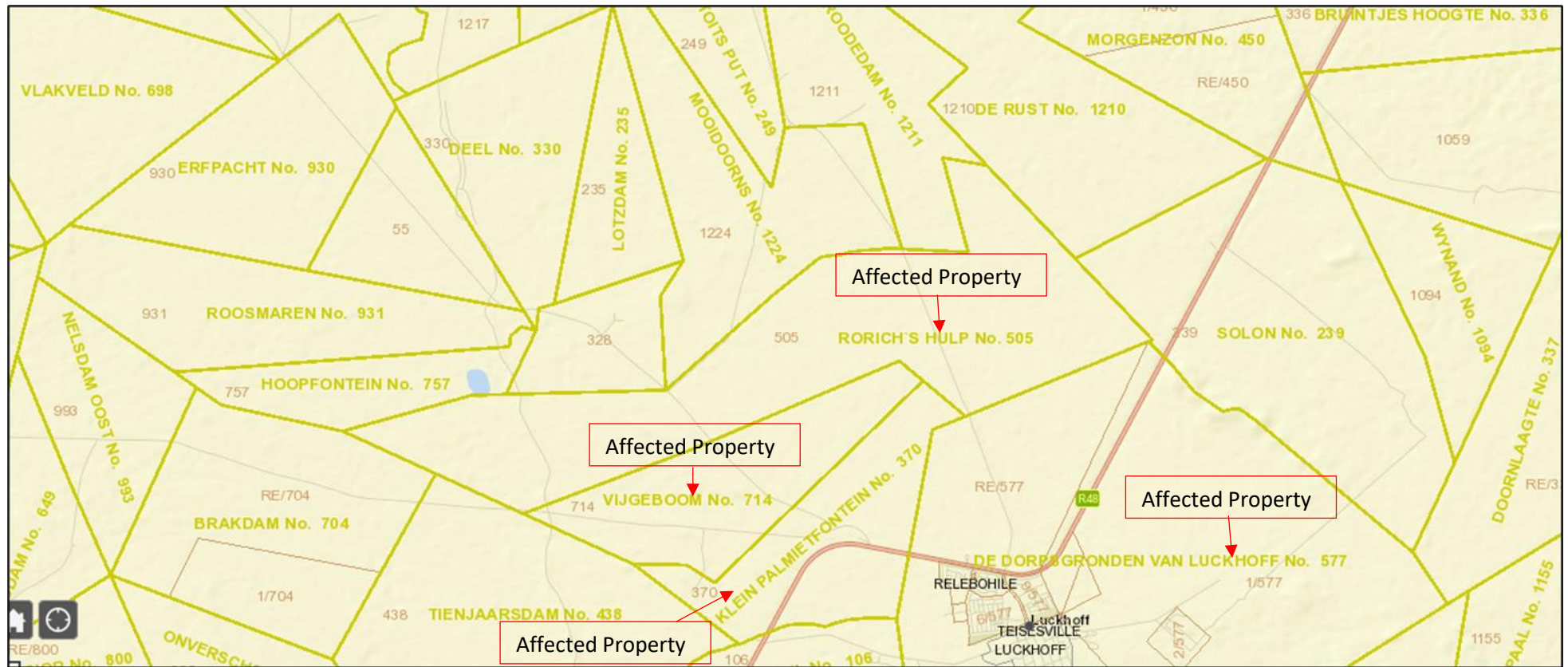


Figure 5.4: Surrounding landowners are identified around the affected properties as indicated

5.2.3 Registered I&APs

I&APs include all stakeholders who deem themselves affected by the proposed activity. According to Regulation 43(1) *“A registered interested and affected party is entitled to comment, in writing, on all reports or plans submitted to such party during the public participation process contemplated in these Regulations and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application, provided that the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application.”*

This report is the Draft Scoping Report which has been made available to all potential and/or registered I&APs and State Departments. They have been provided with a copy of the Draft Scoping Report and have been requested to provide written comments on the report within 30 days. All issues identified during this review period will be documented and compiled into a Comments and Response Report to be included as part of the Final Scoping report.

All comments received prior to the release of the Draft Scoping Report for the 30-day review and comment period have been included in this report as Appendix C5, Appendix C6 and Appendix C7 to provide I&APs an opportunity to confirm that their comments raised during the initial public participation phase has been included and considered as part of the S&EIR process.

5.2.4 Issues raised by I&APs and consultation bodies

Any comments received during the circulation of the draft Scoping Report will be summarised in the final Scoping Report. The full wording and original correspondence are included in Appendix C6.

5.3 THE ENVIRONMENTAL ATTRIBUTES ASSOCIATED WITH THE PREFERRED ALTERNATIVE

The following sections provide general information on the biophysical and socio-economic attributes associated with the preferred alternative (i.e., the location of the development footprint within the affected property).

5.3.1 Biophysical environment

The biophysical environment is described with specific reference to geology, soils, agricultural potential, vegetation and landscape features, climate, biodiversity, heritage features (in terms of archaeology and palaeontology), the visual landscape and the social environment to be affected. A number of specialists were consulted to assist with the compilation of this chapter of the report – refer to the Table 1.2.

However, due to the fact that the area proposed for development (i.e., the development area) exclusively consists of land used for grazing and excludes the areas under cultivation, limited sensitive areas from an ecological, heritage or conservation point have been identified. These include the two (02) small depressions (wetland features) located adjacent to the development footprint. These features are described in more detail below.

5.3.1.1 Geology, soils and agricultural potential

According to the Agriculture Compliance Statement (attached in Appendix E4), the arid climate (low rainfall of approximately 344 mm per annum and high evaporation of approximately 1,510 mm per annum (Schulze, 2009)) is the limiting factor for land capability, regardless of the soil capability and terrain. Moisture availability is very limiting to any kind of agricultural production. Moisture availability is insufficient for crop production without irrigation and the potential agricultural land use of the site is therefore limited to grazing. The land has a fairly high long-term grazing capacity of 13 hectares per large stock unit. Because climate is the limiting factor that controls production potential, it is the only aspect of the agro-ecosystem description that is required for assessing the agricultural impact of this development. All other agricultural potential parameters become irrelevant under the dominant limitation of aridity.

The screening tool classifies agricultural sensitivity according to only two independent criteria – the land capability rating and whether the land is used for cropland or not. All cropland is classified as at least high sensitivity, based on the logic that if it is under crop production, it is indeed suitable for it, irrespective of its land capability rating.

The screening tool sensitivity categories in terms of land capability are based upon the Department of Agriculture's updated and refined, country-wide land capability mapping, released in 2016. The data is generated by GIS modelling. Land capability is defined as the combination of soil, climate, and terrain suitability factors for supporting rain fed agricultural production. It is an indication of what level and type of agricultural production can sustainably be achieved on any land, based on its soil, climate, and terrain. The higher land capability values (≥ 8 to 15) are likely to be suitable as arable land for crop production, while lower values are only likely to be suitable as non-arable grazing land.

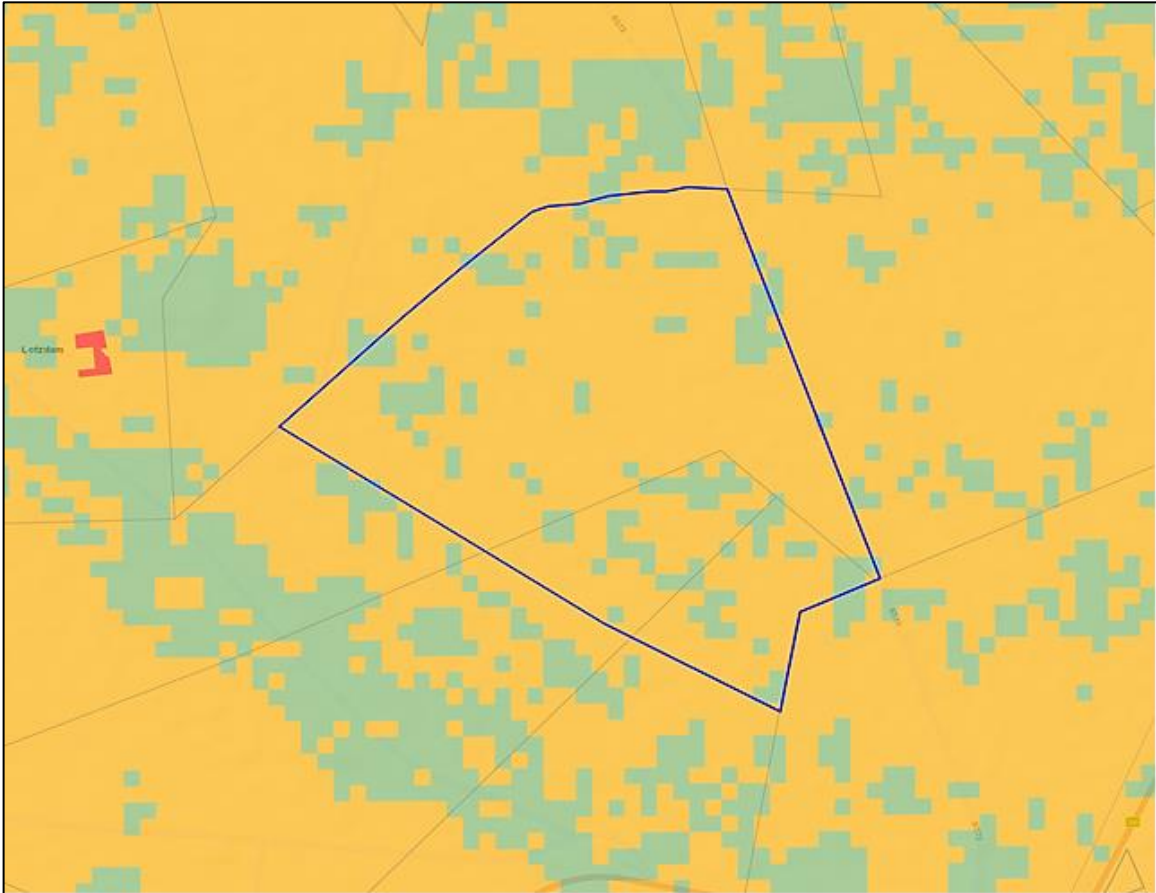


Figure 5.5: Agricultural sensitivity of the development footprint as per the results of the DFFE Screening Tool (Appendix B)

None of the land is classified as cropland and agricultural sensitivity is therefore purely a function of land capability. The classified land capability of the sites is predominantly 6, but ranges from 4 to 7. The small-scale differences in the modelled land capability across the project area are not very accurate or significant at this scale and are more a function of how the data is generated by modelling, than actual meaningful differences in agricultural potential on the ground. Values of 1 to 5 translate to a low agricultural sensitivity and values of 6 to 8 translate to a medium agricultural sensitivity, although there is little real difference between low and medium agricultural sensitivity on the ground.

The low to medium agricultural sensitivity of the site, as identified by the screening tool, is confirmed by this assessment. The motivation for confirming the sensitivity is predominantly that the climate data (low rainfall of approximately 344 mm per annum and high evaporation of approximately 1,510 mm per annum) proves the area to be arid and therefore of limited land capability. Moisture availability is completely insufficient for viable rain-fed crop production. In addition, the land type data shows a high proportion of shallow soils on underlying rock and hardpan carbonate. A low to medium agricultural sensitivity is entirely appropriate for the site, which is of insufficient land capability for crop production.

This site sensitivity verification verifies the entire site as being of low to medium agricultural sensitivity, with a land capability of predominantly 6. The required level of agricultural assessment is therefore confirmed as an Agricultural Compliance Statement.

5.3.1.2 Vegetation, topography and landscape features

The study area is situated predominantly within the Northern Upper Karoo (NKu 3) vegetation unit, associated with the upper reaches of the Lemoenspruit River catchment (D33C), a small subquaternary catchment linked to the Orange / Gariep River. This is located within the Orange River Water Management Area (Kimberley), in the Nama Karoo Eco-region. Refer to Figure 5.6.

The project site is located within the Nama-Karoo Biome which is situated on the central plateau of the western half of South Africa extending into south-eastern Namibia (Mucina *et al.*, 2011). This region is characterised by an arid climate with most rainfall occurring over the summer months (December to April). Mean Annual Rainfall (MAR) increases from 70mm in the north-west (near the desert biome) to 500mm in the south-east with rainfall quantity and reliability increasing eastwards. The project site is located in the eastern portion of the biome and receives a MAR of 286mm per annum (metoebblue.com, Accessed: 21-12-22) with mean annual highs reaching 32 °C and mean annual lows of 1°C.

The Nama-Karoo is underlain by a succession of sedimentary rocks that includes the Cape Supergroup followed by Dwyka tillites and then other fossil rich sediments of the Karoo Supergroup (Mucina *et al.*, 2011). Volcanic activity in the area has resulted in intrusions of igneous rock resulting in the formation of ridges, hills and mountains. Igneous rock is more resistant to weathering than sedimentary rock resulting in the formation of mesas, buttes and plateaus within the biome. These features are often characterised by a higher species diversity than the low-lying flat areas. The topography of the project site is a combination of relatively flat open grassland plains interspersed with high lying rocky ridges, hills and slopes.

The climatic variation, geology and soils associated within this biome have given rise to plains dominated by dwarf succulent shrubs interspersed with grasses, geophytes and annual herbs (Mucina *et al.*, 2011). Variation in the timing of the rainfall and the amount received between years has resulted in variation in the structure, cover and productivity of the vegetation present as well as a diversity of plant forms that range from ephemerals, annuals, geophytes, C₃ and C₄ grasses, succulents, deciduous and evergreen perennial shrubs and trees.

Other factors that have influenced the structure and composition of the vegetation within the biome, and which are therefore ecological drivers, include grazing of domestic livestock and wildlife, fires and rainfall. Increased grazing pressure or fire events, followed by heavy rainfall makes this biome prone to erosion.

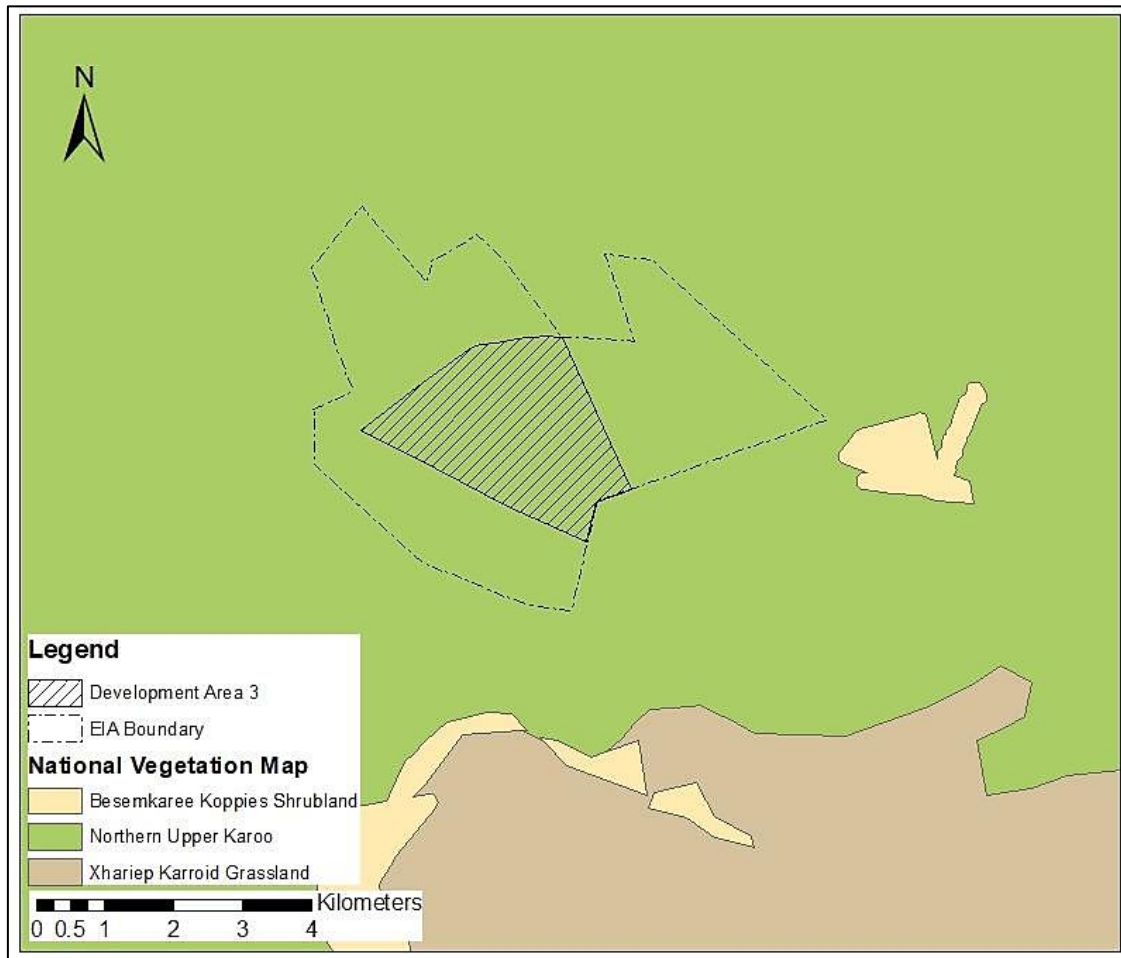


Figure 5.6: National vegetation map for the project site

Vegetation Units:

Vegetation types and distributions specific to the project site are described based on the National Vegetation Map (Figure 5.6 above) and data gathered during the field survey. According to the National Vegetation Map, the entire site occurs within the vegetation type *Northern Upper Karoo*.

The Northern Upper Karoo occurs in the Northern Cape and Free State Provinces and is described as a shrubland dominated by dwarf karoo shrubs, grasses and *Senegalia mellifera subsp. detinens* (Mucina *et al.*, 2011). It is associated with typically flat to gently sloping topography with isolated hills of Upper Karoo Hardeveld.

The Upper Karoo Hardeveld recorded on site is a matrix of grassland and karoo shrubland dominated by grass species such as *Eragrostis lehmanniana*, *Themeda triandra*, *Aristida adscensionis*, *Chloris virgata* and *Digitaria eriantha* and shrubs and herbs such as *Hertia pallens*, *Eriocephalus ericoides*, *Aptosimum marlothii*, *Senecio burchelli*, *Wahlenbergia albens* and *Zygophyllum lichtensteinianum*. There was one patch of shrubs/small trees within the site comprised of *Vachellia karoo*, *Ziziphus mucronata*, *Searsia burchelli*, *Searsia pyroides*, *Searsia*

lancea and Schinus mole. The vegetation has been grazed and is of low diversity and is thus considered near-intact.

This vegetation type is listed as Least Concern with a conservation target of 21%. Although listed as not protected, current data indicates that 94% of this vegetation type remains intact (RLE, 2021).

A total of 41 species from 18 families were recorded within the project site (Table 5.1 below) (a full species list has been included in Appendix 1 of the Ecological specialist report). The Poaceae family had the highest number of species (eight species) followed by the Asteraceae family (six species), Scrophulariaceae family (five species), Anacardiaceae family (4 species). All other families had either one or two species present. Of the 41 recorded species, 38 species are listed as least concern and three as Not Evaluated. No Species of Conservation Concern (SCC) were recorded on site.

Table 5.1: Number of families and species recorded within the project site

Family	No. of Species	Family	No. of Species
POACEAE	8	AMARANTHACEAE	1
ASTERACEAE	6	AMARYLLIDACEAE	1
SCROPHULARIACEAE	5	CAMPANULACEAE	1
ANACARDIACEAE	4	CONVOLVULACEAE	1
ASPARAGACEAE	2	CYPERACEAE	1
ASPHODELACEAE	2	PAPAVERACEAE	1
FABACEAE	2	RHAMNACEAE	1
MALVACEAE	2	SOLANACEAE	1
AIZOACEAE	1	ZYGOPHYLLACEAE	1

Protected Areas, Critical Biodiversity Areas (CBA) and Ecological Support Areas (ESA)

The proposed site falls within the Free State Province and as such their bioregional plan is applicable. It is our understanding that this plan is based on terrestrial data and that the aquatic data has not yet been added to the spatial planning tool data set. Critical Biodiversity Areas (CBAs) are areas that are required to meet the regions biodiversity targets and there are no, or very few, other options available in the landscape to meet these targets. Such sites therefore need to remain in a largely natural state and land management objectives require that these areas are managed for no further degradation and that degraded areas are rehabilitated. A small portion of the southern section of the project area occurs within a CBA 1 and CBA 2. The biodiversity features driving this are the vegetation type Northern Upper Karoo and the species, *Lithops salicola*. The field survey found that there was no suitable habitat within this area to support this species and as such is unlikely to negatively affect the functioning of this feature.

Ecological Support Areas (ESAs) are important for maintaining ecological processes on which CBAs depend and are important in delivering ecosystem services. These areas should remain

in a largely functional state and land management objectives should support ecological processes. The project site occurs within an ESA 1. The biodiversity feature driving the ESA is the vegetation type Northern Upper Karoo. Since 94% of this vegetation type remains intact, the development is unlikely to negatively affect the functioning of this feature. Refer to Figure 5.7.

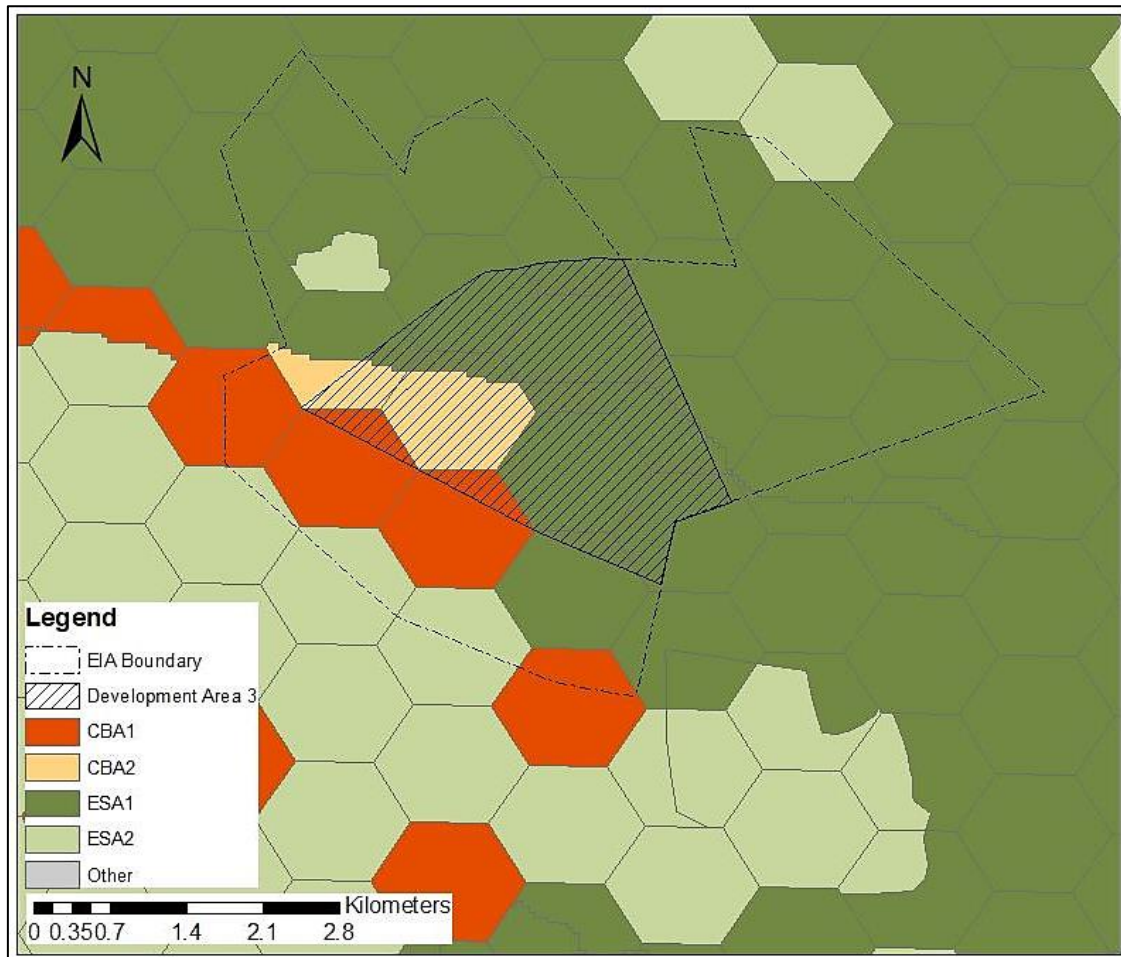


Figure 5.7: Map illustrating the project site in relation to CBAs and ESAs. The site falls within an ESA 1.

The project site does not occur within a formally protected area. However, Thanda Tula Private Reserve is situated directly north of the project boundary and is formal Protected Area. Project infrastructure may cause a barrier for species moving south of the reserve. However, since the town of Luckhoff is situated south of the proposed project, there is already a barrier for species moving south. Refer to Figure 5.8.

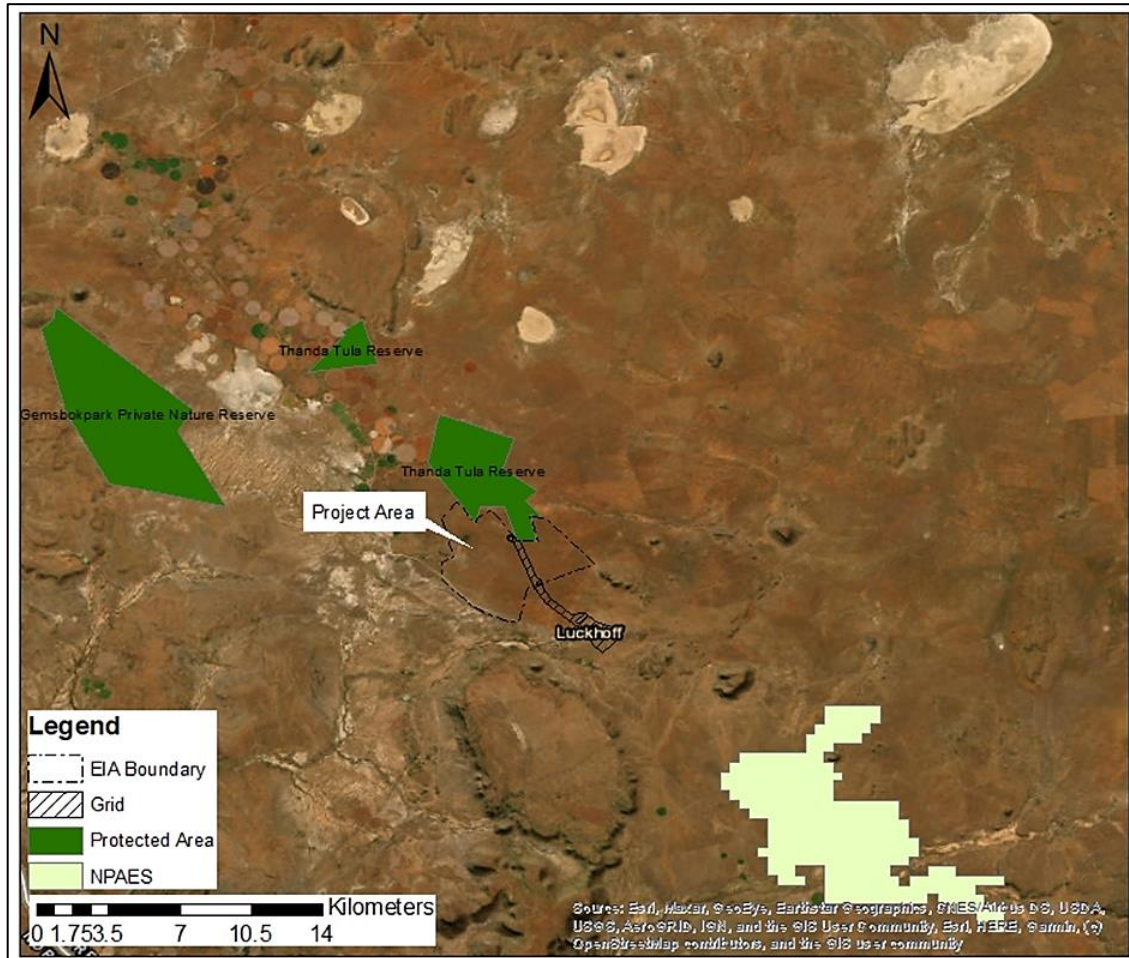


Figure 5.8: Map illustrating the project site in relation to protected areas

Protected Plants in terms of the Free State Nature Conservation Ordinance

Plant species are also protected in the Free State Province according to the Free State Nature Conservation Ordinance. According to this ordinance, no person may pick, import, export, transport, possess, cultivate, or trade in a specimen of a specially protected or protected plant species. Communication with Provincial authorities indicates that a permit is required for all these species if they are expected to be affected by the proposed project.

Although no SCC were recorded, two species (*Aloe broomii* and *Boophone disticha*) are listed as Schedule 6 species on the Free State Nature Conservation Ordinance (No. 8 of 1969). These species will require permits for their removal/destruction if impacted by project infrastructure.

The ecological desktop assessment identified two species of conservation concern that could occur within the project site and the likelihood of occurrence for each of these species assessed:

- *Tridentia virescens*
- *Lithops salicola*

Both species were found to have a low likelihood of occurrence due to their habitat not occurring within the project site.

Declared Invasive Alien Species

The Alien and Invasive Species Regulations (GNR 599 of 2014) are stipulated as part of the National Environmental Management: Biodiversity Act (10/2004). The regulation listed a total of 559 alien species as invasive and further 560 species are listed as prohibited and may not be introduced into South Africa. Below is a brief explanation of the four categories of Invasive Alien Plants as per the regulation.

Category 1 plants are prohibited plants which must be controlled or eradicated. These plants serve no economic purpose and possess characteristics that are harmful to humans, animals or the environment.

- Category 1a: Plants are high-priority emerging species requiring compulsory control. All breeding, growing, moving and selling are banned
- Category 1b: Plants are widespread invasive species controlled by a management program.

Category 2 plants are invaders with certain useful qualities, such as commercial use or for woodlots, animal fodder, soil stabilisation, etc. These plants are allowed in demarcated areas under controlled conditions and in biocontrol reserves.

Category 3 plants are alien plants that are currently growing in, or have escaped from areas such as gardens, but that are proven invaders. No further planting is allowed (except with special permission), nor trade in propagative material. Existing plants may remain but must be prevented from spreading. Plants within the flood line and watercourses must be removed (Bromilow, 2010).

Three exotic species (*Schinus molle*, *Argemone ochroleuca* and *Cymbopogon pospischilii*) were recorded within the project site. *Argemone ochroleuca* is listed as a Category 1b species and must be removed from the project site. It is recommended that an alien invasive management plan is included within the EMPr to manage the spread of exotic and alien invasive species.

5.3.1.3 Wetlands and Riparian Features

The study area is dominated by three major types of natural aquatic features and a small number of artificial barriers associated with catchments and rivers, characterised as follows:

- Ephemeral watercourses with riparian vegetation that included, *Vachellia karroo*, *Searsia lancea*, *Euclea undulata* and *Gymnosporia buxifolia*;
- Depressions, dominated by grass species and
- Dams and weirs / berms with no wetland or aquatic features.

The study area is situated predominantly within the Northern Upper Karoo (NKu 3) vegetation unit, associated with the upper reaches of the Lemoenspruit River catchment (D33C), a small subquaternary catchment linked to the Orange / Gariiep River, refer to Figure 5.9. This is located within the Orange River Water Management Area (Kimberley), in the Nama Karoo Eco-region.

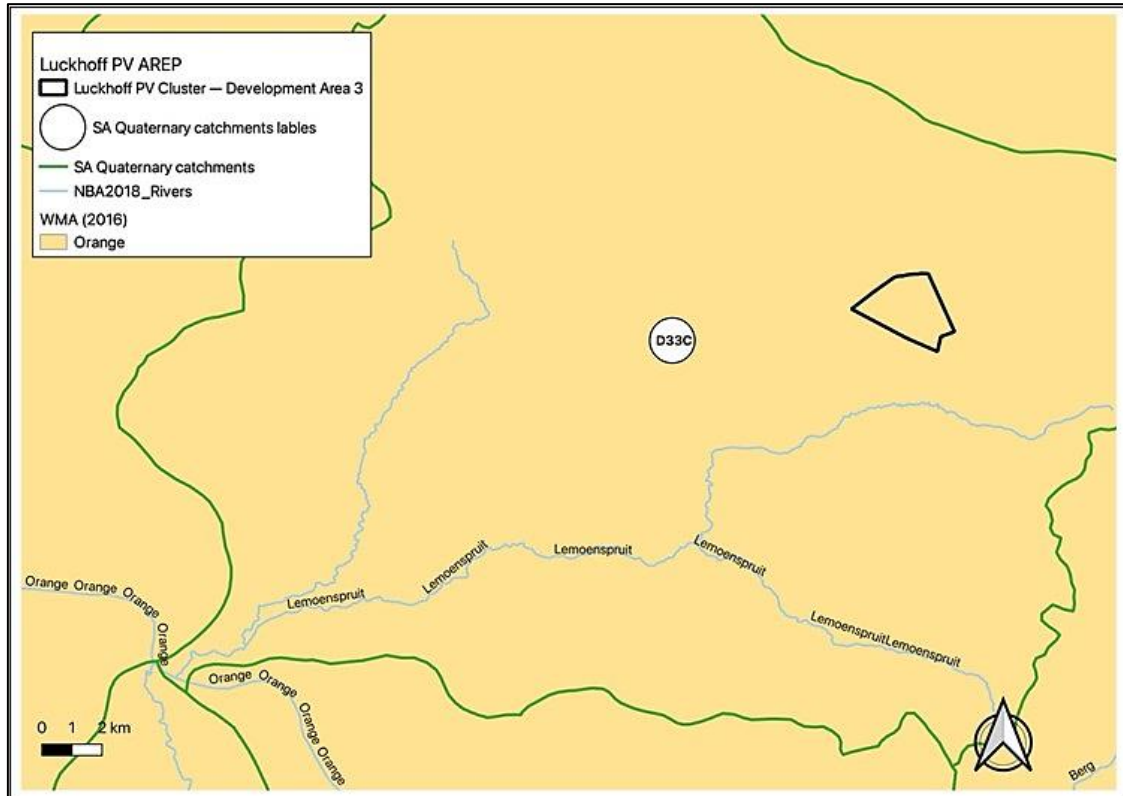


Figure 5.9: Locality map indicating the various quaternary catchments and mainstream rivers within the proposed project’s boundaries

The area is characterised by low lying areas surrounded by inselbergs (koppies). No known or observed watercourses occur within the study area. Similarly, two small depressions were encountered and delineated in this assessment will also be avoided by the development. Assuming no new access roads will be required and that would cross any of these areas listed above. Refer to Figure 5.10 and 5.11.



Figure 5.10: A small depression (red circle) dominated by grass species, that only accumulates water for very short periods

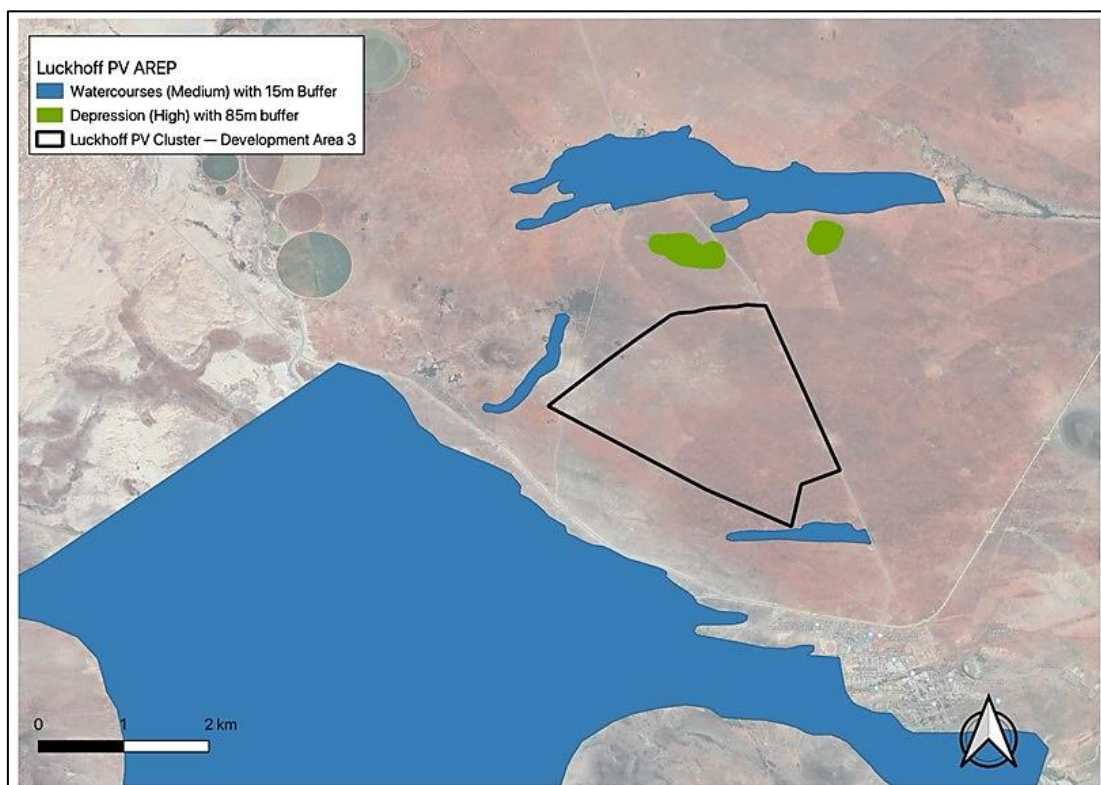


Figure 5.11: Waterbodies delineated in this assessment based on ground-truthing information collected by the aquatic specialist

The Department of Environment Fisheries and Forestry (DFFE) identified the aquatic environment for the study area as having a Low Sensitivity, due to the lack of any aquatic features within the site. The presence of these High, Medium and Low Sensitivity features was confirmed during the required field assessment undertaken by the appointed specialist.

5.3.1.4 Climate

The project site is located within the Nama-Karoo Biome which is situated on the central plateau of the western half of South Africa extending into south-eastern Namibia (Mucina *et al.*, 2011). This region is characterised by an arid climate with most rainfall occurring over the summer months (December to April). Mean Annual Rainfall (MAR) increases from 70mm in the north-west (near the desert biome) to 500mm in the south-east with rainfall quantity and reliability increasing eastwards. The project site is located in the eastern portion of the biome and receives a MAR of 286 mm per annum (metoebblue.com, Accessed: 21-12-22) with mean annual highs reaching 32 °C and mean annual lows of 1°C.

5.3.1.5 Biodiversity

The primary cause of loss of biological diversity is habitat degradation and loss (IUCN, 2004; Primack, 2006). In the case of this study special attention was given to the identification of sensitive species or animal life and birds on site. The following section will discuss the state of biodiversity on the site in more detail.

Avifaunal

According to the Avifaunal Impact Assessment (Appendix E2), approximately 152 bird species have been recorded within the study area, although it is more likely that between 80-100 bird species could occur within the physical boundaries of the proposed solar development footprints (according to the habitat types and the ecological condition thereof). The richness was inferred from the South African Bird Atlas Project (SABAP2) (Harrison et al., 1997; www.sabap2.birdmap.africa) and the presence of suitable habitat in the study area. This equates to 15 % of the approximate 990 species listed for the southern African subregion (and approximately 17.5 % of the 871 species recorded within South Africa). However, the species richness obtained from the pentad grids corresponding to the proposed footprint sites (c. 2940_2440 and 2940_2445) is lower and range between 41 and 67 species, with an average number of 54 species for each full protocol card submitted (for observation of two hours or more; range= 32-59 species).

According to Table 5.2, the study area is poorly represented by biome-restricted species (refer to Table 5.3), although local and regional endemic and near-endemic bird species are expected to be well represented (between 20-40% respectively).

Table 5.2: A summary table of the total number of species, Red listed species (according to Taylor et al., 2015 and the IUCN, 2022), endemics and biome-restricted species (Marnewick et al., 2015) expected (sensu SABAP2) to occur in the study site and immediate surroundings

Description	Expected Richness Value
Total number of species*	152 (15 %)
Number of Red Listed species*	7 (5 %)
Number of biome-restricted species – Namib-Karoo and Kalahari-Highveld <u>Biomes</u> *	5 (20 %)
Number of local endemics (BirdLife SA, 2022)*	4 (10 %)
Number of local near-endemics (BirdLife SA, 2022)*	7 (23 %)
Number of regional endemics (Hockey <i>et al.</i> , 2005)**	22 (21 %)
Number of regional near-endemics (Hockey <i>et al.</i> , 2005)**	24 (39 %)

* only species in the geographic boundaries of South Africa (including Lesotho and eSwatini) were considered.

** only species in the geographic boundaries of southern Africa (including Namibia, Botswana, Zimbabwe and Mozambique south of the Zambezi River) were considered

*** Percentage values in brackets refer to totals compared against the South African avifauna (sensu BirdLife SA, 2022).

Table 5.3: Expected biome-restricted species (Marnewick et al, 2015) likely to occur on the study site and immediate surroundings.

Species	Kalahari-Highveld	Namib-Karoo	Expected Frequency of occurrence
Kalahari Scrub Robin (<i>Cercotrichas paena</i>)	X		Common
Ludwig's Bustard (<i>Neotis ludwigii</i>)		X	Uncommon
Layard's Warbler (<i>Curruca layardi</i>)		X	Common
Pale-winged Starling (<i>Onychognathus nabouroup</i>)		X	Uncommon
Sickle-winged Chat (<i>Emarginata sinuata</i>)		X	Fairly Common

Table 5.4. provides an overview of bird species of conservation concern that could occur on the study site and immediate surroundings based on their historical distribution ranges and the presence of suitable habitat. According to Table 5.4, a total of seven species could occur on the study area which include six globally threatened species and one globally near threatened species.

It is evident from Table 5.4 that the occurrence of threatened species on the study site was low (sensu SABAP2). It is evident that suitable habitat for the occurrence of the globally endangered Secretarybird (*Sagittarius serpentarius*) and the globally endangered Ludwig's Bustard (*Neotis ludwigii*) was absent, thereby suggesting that the probability that these species could occur within the physical boundaries of the study site is high. The status of these two endangered species (in particular their breeding status) will be verified during the EIA/baseline survey of the project phase.

In addition, the nearby "koppies" and outcrops provide suitable habitat for the globally near threatened African Rock Pipit (*Anthus crenatus*) to occur. However, this species is probably absent on the proposed development footprint sites due to the absence of suitable habitat. The remainder of the species (according to Table 5.4) is regarded as highly irregular visitors to the study area.

Table 5.4: Bird species of conservation concern that could utilise the study area and immediate surroundings based on their historical distribution range and the presence of suitable habitat. Red list categories according to the IUCN (2022)* and Taylor et al. (2015)**.

Species	Global Conservation Status*	National Conservation Status**	SABAP2 reporting rate	Preferred Habitat	Potential Likelihood of Occurrence
<i>Anthropoides paradiseus</i> (Blue Crane)	Vulnerable	Near threatened	6.25 (based on a single record)	Prefers open grasslands. Also forages in wetlands, pastures and agricultural land.	Highly irregular foraging visitor although recently (22/08/2022) observed on the study area
<i>Anthus crenatus</i> (African Rock Pipit)	Near threatened	Near threatened	25.00 (based on four records)	Exposed rock and cliffs in arid mountainous terrain or isolated koppies.	Probably absent on the physical development footprint sites due to the absence of suitable habitat. It is a fairly common resident to the nearby Besemkaree Koppies shrubveld.
<i>Oxyura maccoa</i> (Maccoa Duck)	Endangered	Vulnerable	6.25 (based on a single record)	Large saline pans and shallow impoundments.	Probably absent on the physical study site due to the absence of suitable habitat.

Species	Global Conservation Status*	National Conservation Status**	SABAP2 reporting rate	Preferred Habitat	Potential Likelihood of Occurrence
					It was last recorded during 04 November 2010 in the wider study region (sensu SABAP2).
<i>Gyps coprotheres</i> (Cape Vulture)	Vulnerable	Endangered	5 (based on a single record)	Mainly confined to mountain ranges, especially near breeding site. Ventures far afield in search of food.	An irregular foraging/scavenging visitor to the study area pending the presence of food. It was last observed during 2019 on the study area
<i>Gyps africanus</i> (White-backed Vulture)	Critically Endangered	Critically Endangered	6.25 (based on a single record)	Breed on tall, flat-topped trees. Mainly restricted to large rural or game farming areas.	An irregular foraging/scavenging visitor to the study area pending the presence of food. It was last observed during 2015 on the study area
<i>Neotis denhami</i> (Ludwig's Bustard)	Endangered	Endangered	10.00 (based on two independent records)	Open savannoid and arid grassland and open karroid to semi-desert plains.	An uncommon foraging visitor and potential breeding resident. It was last recorded during 2018 on the study area. The breeding status of this species on the study area will be verified during the EIA/baseline survey.
<i>Sagittarius serpentarius</i> (Secretarybird)	Endangered	Endangered	10.00 (known from two independent ad hoc observations)	Prefers open grassland or lightly wooded habitat.	Potentially a regular foraging visitor and breeding resident on the study area – the breeding status of this species on the study area will be verified during the EIA/baseline survey. It was also recently observed on the study area (07/07/2022)

Fauna

All species have a unique geographic range which describes the spatial area where a species is found. This is a species distribution. Some species have a range which covers most of the earth, this is known as a cosmopolitan distribution and others a very limited geographic area known as an endemic distribution. However, just because an area may be within a species distribution the species may no longer inhabit the area or may not inhabit it permanently. For example, large carnivores such as Rhino have a distribution which include the project area, but these animals no longer occur outside of reserves and private game farms. Further, a species may occur in the broader area (QDS/Pentad) where habitat is available and if its preferred habitat is not present onsite it is unlikely to occur. Therefore, the number of species that could occur in the PAOI (Project Area of Interest) and in the project area is often far fewer than species distributions.

Amphibians

- Of the 12 amphibian species with a distribution that includes the project area, 7 species have been confirmed within the same QDS as the study area.
- Microhabitats important to amphibian species include terrestrial and aquatic habitats i.e., not all amphibians require permanent access to water, some species only require access to water for breeding and egg/tadpole development and some species do not require any water and are fully terrestrial.
- The majority of the species confirmed within the same QDS as the study area are unlikely to permanently occur within the project area. Species that do not require permanent water may occur e.g., Tremelo Sand Frog (*Tomopterna cryptotis*) is likely to occur and increase during the wet season.

Reptiles

- Of the 46 reptile species with a distribution that includes the project area, 21 species have been confirmed within the same QDS as the study area.

Mammals

- Of the 72 mammal species with a distribution that includes the project area, 33 species have been confirmed within the same QDS as the study area.
- Mammal species likely to occur in the project area include rodents such as the Mice, Gerbils (*Gerbilliscus sp.*), Ground Squirrel (*Xerus inauris*) and Cape Porcupine (*Hystrix africaeaustralis*), small carnivores such as Yellow Mongoose (*Cynictis penicillata*), Meerkat (*Suricata suricatta*) and Aardwolf (*Proteles cristata*), Hares (*Scrub and Spring*) and small antelope such as Steenbok.
- Springbok and Black-backed Jackal (*Canis mesomela*) are often viewed as a pest by farmers as the springbok damage fences used to enclose livestock and other game and the Jackal preys on livestock, mainly lambs.
- No rocky habitat was recorded on site thus no mammals related to this habitat are expected e.g., Rock Sengi (*Elephantulus sp.*) and Rock Hyrax (*Procavia capensis*).

Species of Conservation Concern

Species of conservation concern (SCC) are those species that are either nationally threatened and listed as critically endangered, endangered, vulnerable or near-threatened and/or endemic and/or range restricted. It refers to a species that may require conservation of what individuals remain to ensure the longevity of the species.

Amphibians

- None of the amphibian species that have a distribution which includes the project area are of conservation concern. However, all amphibian species are protected under the Lists of Threatened and Protected Species issued in Terms of Section 56(1) of the National Environmental Management: Biodiversity Act, 2004.

Reptiles

- None of the reptile species that have a distribution which includes the project area are of conservation concern.

Mammals

- The study area intersects the distribution of 12 mammal species of conservation concern, six threatened and six near-threatened species.
 - Threatened species includes the Black Rhino (*Diceros bicornis*) (CR), Mountain Reedbuck (*Redunca fulvorufula*) listed as endangered and the vulnerable listed Black-footed Cat (*Felis nigripes*), Cheetah (*Acinonyx jubatus*), Leopard (*Panthera pardus*) and Spotted-necked Otter (*Hydrictis maculicollis*).
 - Near-threatened species includes the White Rhino (*Certotherium simum*), Brown Hyaena (*Parahyaena brunnea*), Cape Clawless Otter (*Aonyx capensis*), Vlei Rat (*Otomys auratus*), Serval (*Leptailurus serval*) and African Striped Weasel (*Poecilogale albinucha*).
- The large mammal species would not occur in the project area unless stocked and therefore have not been assessed further. This includes the Black Rhino, Cheetah, Leopard and White Rhino.
- The likelihood of occurrence for the remaining species has been assessed in the table below. Six species have a low likelihood of occurrence within the study area due to lack of available habitat. One species, the Black-footed Cat, has a moderate likelihood of occurrence in the study area and the African Striped Weasel (*Poecilogale albinucha*) has a high likelihood of occurrence in the study area.

Table 5.5: Mammal Species of Conservation Concern likelihood of occurrence within the study area

Name	Threat Status			Habitat	Likelihood of Occurrence
	Global (IUCN)	National (SA red list, 2016)	TOPS		
Southern Mountain Reedbuck <i>Redunca fulvorufula</i>	*EN	EN		<p>Mountain Reedbuck are typically found in high altitude grasslands and rocky ridges and hillsides from 1,500 – 5,000m above sea level (IUCN, 2017 and Taylor <i>et al.</i>, 2016). They are predominantly grazers and occur in drier hilly areas (such as the Nama Karoo) utilising steep slopes and bases of hills that have a higher moisture content and therefore greener, softer grasses. They avoid open areas with no cover. The availability of drinking water is crucial to their survival and therefore existence.</p> <p>In 1999 this species was estimated to have a population of approximately 33,000 individuals but in 2016 was reported to have unexpectedly declined by 73% (IUCN, 2017; Taylor <i>et al.</i>, 2016).</p>	<p>Low</p> <p>No suitable habitat is present within the site.</p>
Black-footed Cat <i>Felis nigripes</i>	*VU	VU	Protected	<p>The Black-footed cat is typically a solitary, ground dweller that is crepuscular and nocturnal (Sliwa <i>et al.</i> 2016). During the day it makes use of dens, preferring hollowed termite mounds when available but also making use of burrows dug by other animals (e.g., Springhares, Ground Squirrels and Aardvark). It hunts small rodents and ground-dwelling birds found in short, open grasslands and is found in dry, open grasslands, savannah and karoo semi-desert. The estimated EOO is 930,000 km² and individual home ranges for males have been recorded to be approximately 16-20km² and for females were 9-10km².</p>	<p>Moderate</p> <p>Suitable habitat present within the site. The nearest record is 60km north (iNat, July 2022)</p>
Spotted-necked Otter <i>(Hydricotis maculicollis)</i>	NT	VU		<p>0-2500m asl</p> <p>Habitat requirements include streams, rivers, lakes (natural & manmade) and open waters which are unpolluted and are not silted.</p> <p>Shelters along water edges with cover provided by boulders, reeds, long grass, dense bushes and overhanging trees.</p> <p>Feed predominantly on fish and occasionally crabs, frogs, insects (esp. dragonfly larvae) and birds.</p>	<p>Low</p> <p>No suitable habitat is present within the site.</p>

Brown Hyaena <i>Parahyaena brunnea</i>	NT	NT		<p>Inhabits desert areas (<100 mm MAR), semi-desert, open scrub and open woodland savannah (<700 mm). Avoids developed areas but can survive close to them. It is estimated that there are 800–2,200 individuals in SA.</p>	<p>Low</p> <p>Suitable habitat is present within the site (i.e., grasslands and karoo scrub) but this species is sparsely distributed and considered uncommon.</p>
African Clawless Otter <i>Aonyx capensis</i>	NT	NT		<p>This species is the most widely distributed otter species in Africa, with a range stretching from Senegal and Mali throughout most of West Africa to Sudan and Ethiopia, and then southwards throughout East Africa to the Western Cape of South Africa (Jacques <i>et al.</i>, 2021).</p> <p>Provided freshwater (0.5–1.5 m deep) is available this species can occur in a variety of habitats. Permanent habitation is dependent on the availability of prey and shelter and females may exhibit territoriality in these areas (Okes, et al., 2016).</p> <p>Although this species can tolerate high levels of pollution, eutrophication, and disturbance (traffic, dogs, etc) in developed areas this is only in moderation (Okes, et al., 2016).</p>	<p>Low</p> <p>No suitable habitat is present within the site.</p>
Vlei Rat <i>Otomys auratus</i>	NT	NT		<p>Inhabits mesic Highveld Grassland</p> <p>and associated with sedges and grasses adapted to densely vegetated wetlands with wet soils (Taylor, Baxter & Child, 2016).</p>	<p>Low</p> <p>No suitable habitat is present within the site.</p>

<p>Serval</p> <p><i>Leptailurus serval</i></p>	<p>LC</p>	<p>NT</p>		<p>This species depends on vegetation boarding water sources such as wetlands, marshland, rank grass and vleis as well as well-watered savannah with long-grass (Ramesh, <i>et al.</i>, 2016).</p> <p>Servals prey on small mammals, birds, reptiles, fish, and rarely invertebrates. Their main diet consists of Vlei Rats (<i>Otomys sp.</i>) and Striped Mice (<i>Rhabdomys pumilio</i>).</p>	<p>Low</p> <p>No suitable habitat is present within the site (i.e., grasslands along water courses)</p>
<p>African Striped Weasel</p> <p><i>Poecilogale albinucha</i></p>	<p>LC</p>	<p>NT</p>		<p>0-2300m asl</p> <p>Wide habitat tolerance including fynbos, lowland rainforest, semi-desert grassland, pine plantations and agricultural fields but mainly found in savanna.</p>	<p>High</p> <p>Given its high habitat tolerance this species could occur on site.</p>

5.3.1.6 Visual landscape

Visual Receptors can be defined as “Individuals, groups or communities who are subject to the visual influence of a particular project”.

Possible visual receptors identified within the 10km radius landscape which due to use could be sensitive to landscape change. They include:

- Area Receptors which include:
 - Luckhoff.
 - One game/hunting farm.
- Linear Receptors which include:
 - R48 regional road.
 - S572 secondary road.
 - Unnamed secondary road.
- Point Receptors which include:
 - Homesteads on farms.
 - Lodging facilities.

Refer to Figure 5.12 and 5.13: Zone of Theoretical Visibility (ZTV). These maps indicate all areas that are in direct line of site of the proposed development up to a distance of 10km.

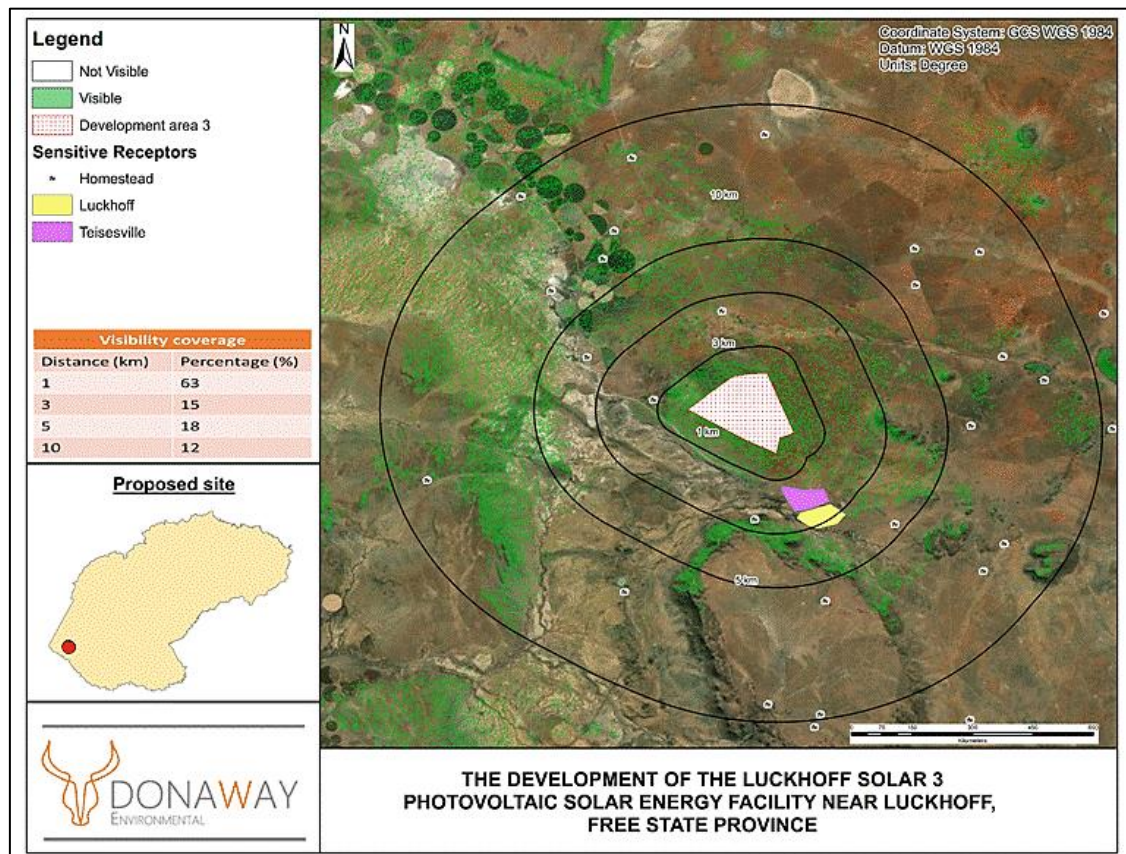


Figure 5.12: Zone of Theoretical Visibility (ZTV) for the SEF, Satellite View

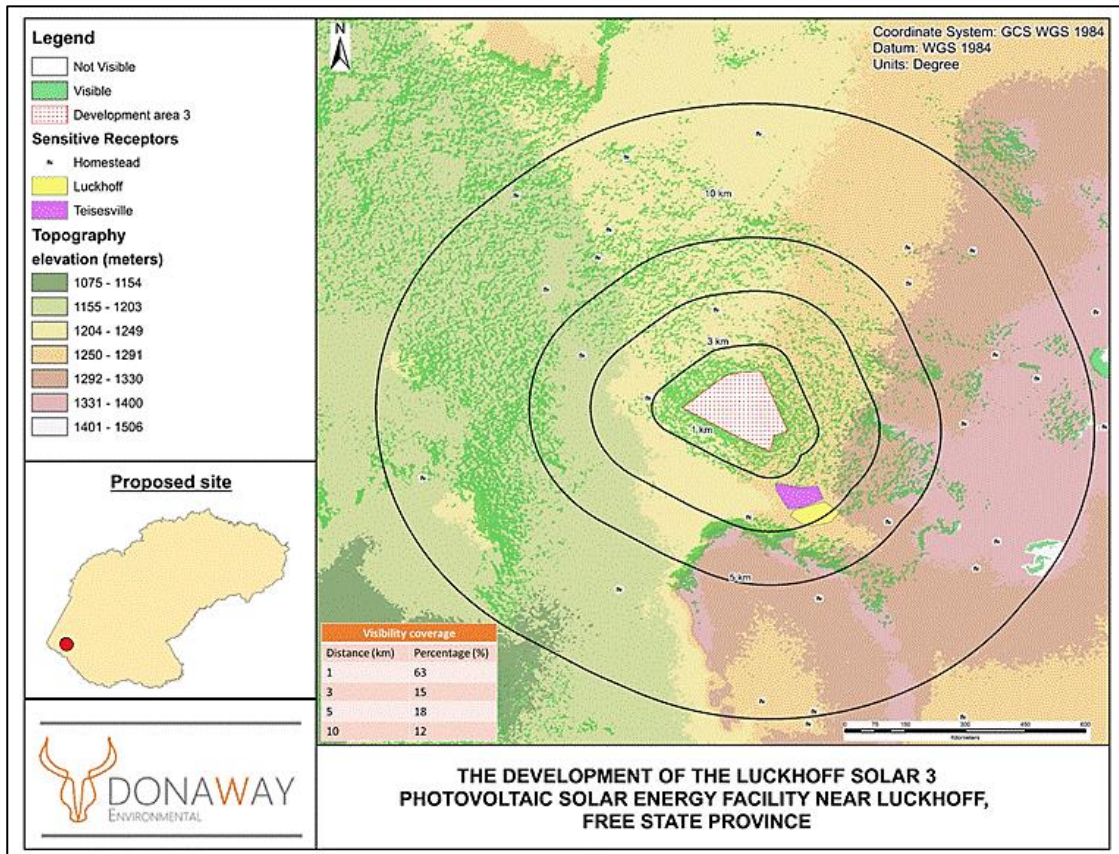


Figure 5.13: Zone of Theoretical Visibility (ZTV) for the SEF, Topography View

Table 5.6 below reflects the visibility rating in terms of proximity on sensitive receptors of the SEF.

Table 5.6: ZTV visibility rating in terms of proximity to the SEF

Radius	Visual Receptors	Visibility rating in terms of proximity
0-1km	<ul style="list-style-type: none"> - S572 secondary road. - One unnamed secondary road. - One game/hunting farm. <p>Coverage: 63%</p>	Very High
1-3km	<ul style="list-style-type: none"> - Two homesteads on farms. - S572 secondary road. - R48 regional road. - Teisesville. - One unnamed secondary road. <p>Coverage: 15%</p>	High
3-5km	<ul style="list-style-type: none"> - One homestead on a farm. - S572 secondary road. - R48 regional road. - One unnamed secondary road. 	Medium

	Coverage: 18%	
5-10km	<ul style="list-style-type: none"> - Six homesteads on farms. - S572 secondary road. - R48 regional road. - One unnamed secondary road. Coverage: 12%	Low

Referring to the assessment score of this VIA report review, the significance of the visual impact will be a “Negative Low Impact”. Sensitive receptors likely to be impacted by the proposed development are the nearby property owners, the town of Luckhoff and people travelling on the R48 regional road, S572 secondary road and an unnamed secondary road located to the west. A large part of the visual landscape is reflecting a farming landscape with a better visual appearance.

It is believed that renewable energy resources are essential to the environmental well-being of the country and planet (WESSA, 2012). Aesthetic characteristics are subjective, and some people find solar farms and their associated infrastructure pleasant and optimistic while others may find it visually invasive; It is mostly perceived as symbols of energy independence, and local prosperity. The visual impact is also dependant on the land use of an area and the sensitivity thereof in terms of visual impact, such as protected areas, parks and other tourism related activities. Considering all positive factors of such a development including economic factors, social factors and sustainability factors, especially in a semi-arid country, the visual impact of this proposed development will be insignificant and is suggested that the development commence, from a visual impact point of view.

5.3.1.7 Traffic consideration

According to the Traffic Impact Study (Appendix E8), suitable accessibility to the site from the external road network is assessed in line with access spacing requirements, required sight lines and road safety considerations. For Luckhoff Solar 3, it is recommended to gain access to the site via the intersection of S572 and the R48 at Luckhoff and then travel on S572 northwards towards the site approximately 2.2 km. Refer to Figure 5.14.

The geometric design and layout for the internal roads from the recommended access points need to be established at detailed design stage. Existing structures and services, such as drainage structures, signage and pipelines will need to be evaluated if impacting on the roads. It needs to be ensured that the gravel sections remain in good condition and will need to be maintained during the additional loading of the construction phase and then reinstated after construction is completed.

The geometric design constraints encountered due to the terrain should be taken into consideration by the geometric designer. Preferably, the internal roads need to be designed with smooth, relatively flat gradients (recommended to be no more than 8%) to allow a larger transport load vehicle to ascend to the respective laydown areas.

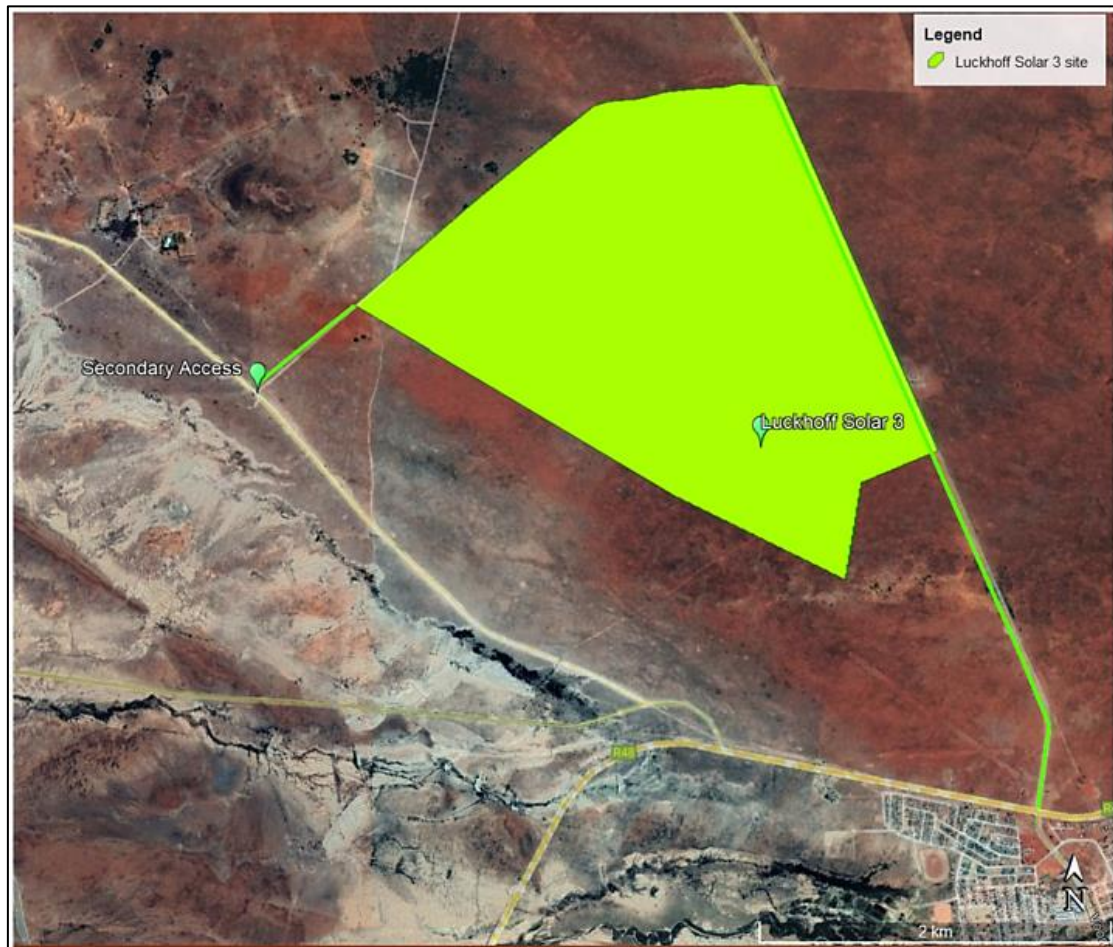


Figure 5.14: Aerial view of the recommended access towards Luckhoff Solar 3

Abnormal permits are required for vehicles exceeding the following permissible maximum dimensions on road freight transport in terms of the Road Traffic Act (Act No. 93 of 1996) and the National Road Traffic Regulations, 2000:

- Length: 22 m for an interlink, 18.5 m for truck and trailer and 13.5 m for a single unit truck
- Width: 2.6 m Height: 4.3 m measured from the ground. Possible height of load – 2.7 m.
- Weight: Gross vehicle mass of 56t resulting in a payload of approximately 30t
- Axle unit limitations: 18t for dual and 24t for triple-axle units
- Axle load limitation: 7.7t on the front axle and 9t on the single or rear axles

Any dimension/mass outside the above will be classified as an Abnormal Load and will necessitate an application to the Department of Transport and Public Works for a permit that will give authorisation for the conveyance of said load. A permit is required for each Province that the haulage route traverses.

In addition to the above, the preferred routes for abnormal load travel should be surveyed prior to construction to identify any problem areas, e.g., intersections with limited turning radii and sections of the road with sharp horizontal curves or steep gradients, which may require modification. After the road modifications have been implemented, it is

recommended to undertake a “dry-run” with the largest abnormal load vehicle, to ensure that the vehicle can travel without disruptions. It needs to be ensured that gravel sections (if any) of the haulage routes remain in good condition and will need to be maintained during the additional loading of the construction phase and reinstated after construction is completed.

There are bridges and culverts along the National and Provincial routes, which need to be confirmed for load bearing capacity and height clearances. However, there are alternative routes which can be investigated if the selected route or sections of the route should not be feasible.

Any low hanging overhead lines (lower than 5.1 m), e.g., Eskom and Telkom lines, along the proposed routes will have to be moved to accommodate the abnormal load vehicles.

From a transport engineering perspective, the proposed development alternatives (i.e., electrical infrastructure compound location alternatives and the technology options for the BESS) are acceptable as they do not have any impact on the traffic on the surrounding road network.

5.3.2 Description of the socio-economic environment

The socio-economic environment is described with specific reference to social, economic, heritage and cultural aspects.

5.3.2.1 Socio-economic conditions

Free State Province is the landlocked core of the country. It is centrally placed, with good transport corridors to the north and the coast. It is the third biggest of South Africa’s nine provinces in terms of size, and primary agriculture is a key economic sector. Mining is also important but has been declining steadily since 2008.

The Free State is situated in the heart of the country, between the Vaal River in the north and the Orange River in the south, bordered by the Northern Cape, Eastern Cape, North West, Mpumalanga, KwaZulu-Natal and Gauteng provinces, as well as Lesotho. The Free State is a rural province of farmland, mountains, goldfields, and widely dispersed towns. This province is an open, flat grassland with plenty of agriculture that is central to the country’s economy. Mining is its largest employer.

Bloemfontein is the capital and is home to the Supreme Court of Appeal, as well as the University of Free State and the Central University of Technology. The province also has 12 gold mines, producing 30 percent of South Africa’s output.

Although the Free State is the third-largest province in South Africa, it has the second-smallest population and the second-lowest population density. It covers an area of 129 825km² and has a population of 2 834 714 – 5.1% of the national population. Languages spoken include Sesotho (64.4%), Afrikaans (11.9%) and Zulu (9.1%). The Free State Province contributes 5.4% to South Africa’s total gross domestic product (2006).

Agriculture is a key economic sector – 8% of the country’s produce comes from Free State. In 2010, agriculture provided 19.2% of all formal employment opportunities in the region. The economy is dominated by agriculture, mining and manufacturing. Known as the ‘bread-basket’

of South Africa, about 90% of the province is under cultivation for crop production. It produces approximately 34% of the total maize production of South Africa, 37% of wheat, 53% of sorghum, 33% of potatoes, 18% of red meat, 30% of groundnuts and 15% of wool. The province is the world's fifth-largest gold producer, with mining the major employer.

Other mineral resources – gold, diamonds, and low-grade coal – are also important to the province; mining contributed 9% to the local economy and employed some 33 000 people in 2010. Other commodities include clay, gypsum, salt, and uranium.

Manufacturing also features in the provincial economic profile. This sector makes up 14% of the provincial output, with petro-chemicals (via Sasol) taking account of more than 85% of the output.

Free State is strategically placed to take advantage of the national transport infrastructure. Two corridors are of particular importance: the Harrismith node on the N3 corridor between Gauteng and KwaZulu-Natal and the N8. The N1 joins Gauteng to the Western Cape. Bloemfontein International Airport handles about 250 000 passengers and about 221 000 tons of cargo a year.

Important towns include Welkom, the heart of the goldfields; Odendaalsrus, another gold-mining town; Sasolburg; Kroonstad; Parys; and Phuthaditjhaba. The Free State is also home to the Vredefort Dome, the largest visible meteor-impact site in the world, which was formed two billion years ago when a meteorite 10 kilometres wide slammed into Earth. The Vredefort Dome is one of South Africa's seven UNESCO World Heritage sites.

In the north-eastern Free State is the Golden Gate Highlands National Park, which is the province's prime tourist attraction.

Xhariep District Municipality

The Xhariep District Municipality is a Category C municipality situated in the southern part of the Free State. It is bordered by the Mangaung Metro to the north, Eastern Cape to the south, Lesotho to the east, and Northern Cape to the west.

It is the largest district in the province, making up just more than a third of its geographical area. It is comprised of three local municipalities: Letsemeng, Kopanong and Mohokare, which include 21 towns. Its administrative headquarters are in Trompsburg, which lies 125km south of Bloemfontein.

The towns in this district boast abundant natural resources such as water and agricultural land. The largest dam in South Africa is situated at the southern tip of the district. Three national roads (N1 – Gauteng to Cape Town, N6 – Eastern Cape to Bloemfontein and N8 – Bloemfontein to Kimberley) pass through this area.

The municipality consists of the following towns: Bethulie, Edenburg, Fauresmith, Gariep Dam, Jacobsdal, Jagersfontein, Koffiefontein, Luckhoff, Oppermansgronde, Petrusburg, Philippolis, Reddersburg, Rouxville, Smithfield, Springfontein, Trompsburg, Waterkloof, Zastron.

The main economic sectors include: Agriculture, construction, mining, transport and communication.

In 2016 the Municipality had a population of 125 884. By 2016 only 34.7% of dwellings had piped water inside their dwellings and 6.8% of household still did not have electricity in their dwellings.

Letsemeng Local Municipality

The Letsemeng Local Municipality is a Category B municipality situated in the south-western Free State Province within the Xhariep District. It is bordered in the north by the Lejweleputswa District, in the south by Kopanong, in the east by the Mangaung Metro, and in the west by the Northern Cape Province. It is one of three municipalities in the district, making up almost a third of its geographical area. Koffiefontein is the municipal head office.

The socio-economic growth of the municipality is centred on agriculture. The municipal area also has mining activities, with diamond minerals being the major natural resource that helps with employment creation.

The municipality covers an area of 9 826km² and consists of the following towns: Jacobsdal, Koffiefontein, Luckhoff, Oppermansgronde and Petrusburg.

The main economic sectors in the municipality are Farming and Mining.

5.3.2.2 Cultural and heritage aspects

The cultural landscape qualities of the region essentially consist of two components. The first is a rural area in which the human occupation is made up of a very limited pre-colonial Stone Age and Iron Age occupation. The second and much later component is a colonial farmer one, with a very limited urban component consisting of a number of smaller towns, most of which developed during the last 120 to 150 years.

Stone Age

The Orange River and some of its tributaries are well known for its river gravels, in some places containing large numbers of Early Stone Age tools (Acheullian) (Sampson 1972). The larger region also produced what was to become the Fauresmith industry, first identified by Van Riet Lowe. The Fauresmith is regarded to represent a transitional phase between the ESA and MSA, and have some technological and typological elements of the latter. There is a tendency towards smaller tools and small hand-axes in particular seem to be a characteristic feature of the Fauresmith. Assemblages include refined hand-axes, long blades, convergent flakes/points, scrapers and prepared cores used in the manufacture of these tool types. This combination of Modes 2 and 3 makes it a likely transitional industry (Barham & Mitchell 2008:229).

Although reports indicate that sites containing Later Stone Age lithics are few and far between, a number of rock engraving sites dating to the Later Stone Age as well as the historic period are known to exist in the larger region, especially in the region on the eastern side of the Riet River. In the latter case, people riding horses are depicted. Many of these engravings from different sites have been removed and are “exhibited” in the town of Koffiefontein.

Most of the archaeological remains recorded in the larger region of the project area consist of a background scatter of weathered and patinated, typologically mixed Middle Stone Age (MSA) artefacts, with a few isolated samples dating to the Fauresmith period. These artefacts

occur dispersed within the surface gravels, rather than as discrete concentrations. The fact that there appears to be no stratigraphic context and no organic remains are preserved would suggest that most of the proposed Luckhoff 1 development area is of low archaeological heritage sensitivity.

As yet, no sites dating to the Early Iron Age have been reported from the region and most sites date to the Late Iron Age. A number of stone walled settlement sites, classified by Maggs (1976) as type R ruins, occur north and south of the study area. These sites represent a transitional phase between Khoi herders settling permanently and Iron Age Tswana-speaking people entering the area. These settlements were first described by William Burchell during the first two decades of the 19th century. A large number of graves, located in close vicinity to the Riet River, have been archaeologically investigated (Humphreys 1973).

The town of Luckhoff was established in 1892 and named after the Reverend H.J. Luckhoff (1842 – 1943). Like Fauresmith, sheep farming is the backbone of the town economy. The Van der Kloof Dam, originally named the P.K. le Roux Dam, was completed 1977, is located approximately 30km south of the study region.

Site specific review

From a review of the available old maps and aerial photographs it can be seen that the project area has always been open space, with the main activity being grazing or the making of agricultural fields.



Figure 5.15: Aerial view of the project area dating to 2022

During the survey, the following sites, features and objects of cultural significance were identified in the project area.

Stone Age

- No sites, features or objects of cultural significance dating to the Stone Age were identified in the project area.

Iron Age

- No sites, features or objects of cultural significance dating to the Iron Age were identified in the project area.

Historic period

- No sites, features or objects of cultural significance dating to the historic period were identified in the project area.

Palaeontology

The Palaeontological Impact Assessment (refer to Appendix E6), found that the proposed development is underlain by Quaternary aeolian sand as well as calcrete. The PalaeoMap of the South African Heritage Resources Information System (SAHRIS) indicates that the Palaeontological Sensitivity of the calcretes is High while that of the aeolian sands are Moderate (Almond and Pether, 2009; Almond et al., 2013). Update geology (Council for Geosciences, Pretoria) indicates that the study area is underlain by calcrete, surface limestones and Hardpan as well as alluvium, colluvium, eluvium, gravel, scree, sand, soil and debris. The Quaternary Superficial Sediments, at depth is probably underlain by the Tierberg Formation (Ecca Group, Karoo Supergroup).

It is considered that the proposed Luckhoff Solar 3 Photovoltaic Solar Energy Facility in the Free State will not lead to detrimental impacts on the palaeontological resources of the area. The construction of the development may therefore be authorised as the development footprint is not considered sensitive in terms of palaeontological resources. It is consequently recommended that no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.

If fossil remains are discovered during any phase of construction, either on the surface or uncovered by excavations, the ECO/site manager in charge of these developments must be notified immediately. These discoveries must be secured and the ECO/site manager must alert SAHRA so that appropriate mitigation (documented and collection) can be undertaken by a professional palaeontologist. The specialist would need a collection permit from SAHRA. Fossil material must be curated in an approved collection (museum or university) and all fieldwork and reports must meet the minimum standards for palaeontological impact studies developed by SAHRA.

5.4 SITE SELECTION MATRIX

Due to the nature of the proposed development, the location of the solar PV facility is largely dependent on technical and environmental factors such as solar irradiation, climatic conditions, topography of the site, access to the grid and capacity of the grid. Studies of solar irradiation worldwide indicate that the Free State Province has a high potential for the generation of power from solar.

The receptiveness of the site to PV Development includes the presence of optimal conditions for the siting of a solar energy facility due to high irradiation values and optimum grid connection opportunities (i.e., the grid connection points are located within the affected property which minimizes the length of power line development and consolidates the overall impacts and disturbance of the project within the affected property). Farm Vijeboom No. 714, Farm Rorich's Hulp No. 505, Farm Klein Palmietfontein No. 370, and Farm De Dorpsgronden Van Luckhoff No. 577, where the project is proposed to be located is considered favorable and suitable from a technical perspective due to the following characteristics:

- Climatic conditions: Climatic conditions determine if the project will be viable from an economic perspective as the solar PV facility is directly dependent on the annual direct solar irradiation values of a particular area. The Free State receives high averages of direct normal and global horizontal irradiation, daily. This is an indication that the regional location of the project includes a low number of rainy days and a high number of daylight hours experienced in the region. Global Horizontal Radiation of ~2118 kWh/m²/year is relevant in the area.
- Topographic conditions: The surface area on which the proposed facility will be located has a favourable level topography, which facilitates work involved with construction and maintenance of the facility and ensures that shadowing on the panels do not occur. The topographic conditions, which are favourable, minimizes the significance of the impact that will occur during the clearing and leveling of the site for the construction activities.

- Extent of the site: A significant portion of land is required to evacuate the prescribed 240MW and space is a constraining factor in PV facility installations. Provision was made to assess a larger area than is required for the facility to make provision for any other environmental or technical constraints that may arise and avoiding those areas. Larger farms are sought after to make provision for any constraints imposed by the Department of Agriculture on the extent of land that may be used for such facilities per farm, as well as the opportunities presented for the avoidance of sensitive environmental features present. Farm Vijeboom No. 714, Farm Rorich's Hulp No. 505, Farm Klein Palmietfontein No. 370, and Farm De Dorpsgronden Van Luckhoff No. 577, and the development footprint assessed therein is considered to provide an opportunity for the successful construction and operation of a solar PV facility with a capacity of 240MW, as well as opportunities for the avoidance and mitigation of impacts on the affected environment and sensitive environmental features.
- Site availability and access: The land is available for lease by the developer. Reluctant farm owners or farmers over capitalizing hamper efforts to find suitable farms. Access will be obtained via the intersection of S572 and the R48 at Luckhoff and then travel on S572 northwards towards the site approximately 2.2 km.
- Grid connection: In order for the PV facility to connect to the national grid the facility will have to construct an on-site substation, Eskom switching station and a power line from the project site to connect to the Eskom grid. Available grid connections are becoming scarce and play a huge role when selecting a viable site. Three grid connection options are available and all three are located within the affected property which presents an opportunity for the consolidation of infrastructure and disturbance within the affected landscape.
- Environmental sensitivities: From an environmental perspective the proposed site is considered highly desirable due to limited environmental sensitivities in terms of geology, and soils, agricultural potential, vegetation and landscape features, climate, biodiversity and the visual landscape – refer to Section 5.3.1 of this report. The area proposed for development exclusively consists of land used for agriculture, but a wetland feature (small depression) is located adjacent to the development footprint, as well as a few plant species of conservation concern, that will need to be considered by the developer for the placement of the facility infrastructure within the development footprint.

It is evident from the discussion above that Farm Vijeboom No. 714, Farm Rorich's Hulp No. 505, Farm Klein Palmietfontein No. 370, and Farm De Dorpsgronden Van Luckhoff No. 577, may be considered favourable and suitable in terms of the site and environmental characteristics. As mentioned previously, no alternative areas on the property have been considered for the placement of the development footprint as the assessed development footprint avoids areas that are under cultivation within the affected property. The development footprint of this project will cover a significant portion of the farm; however, provision will be made to exclude any sensitive areas from the facility layout to be developed within the development footprint.

5.5 CONCLUDING STATEMENT ON ALTERNATIVES

When considering the information provided by the specialists with regards to the site selection criteria, the site is identified as preferred due to the fact that the opportunities presented on the site to develop the project in such a way which avoids the areas and features (including the associated buffers) of environmental sensitivity.

Therefore, development of the 240 MW Luckhoff Solar 3 PV Facility on Farm Vijeboom No. 714, Farm Rorich's Hulp No. 505, Farm Klein Palmietfontein No. 370, and Farm De Dorpsgronden Van Luckhoff No. 577, is the preferred option.

Considering the environmental sensitive features present within the development footprint, the Applicant has proposed a draft facility layout which considers technical constraints, and thereby aim to avoid any direct impact on sensitive features. The draft layout will be further assessed as part of the EIA Phase of the project. Refer to Figure J for the draft layout proposed for development.

6 DESCRIPTION OF THE IMPACTS AND RISKS

This section aims to address the following requirements of the regulations:

Appendix 2. (2) A scoping report (...) must include-

(v) 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-

(aa) can be reversed;

(bb) may cause irreplaceable loss of resources; and

(cc) can be avoided, managed or mitigated;

(vi) 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;

(vii) 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;

(viii) the possible mitigation measures that could be applied and level of residual risk;

6.1 SCOPING METHODOLOGY

The contents and methodology of the scoping report aims to provide, as far as possible, a user-friendly analysis of information to allow for easy interpretation.

- Checklist (see section 6.1.1): The checklist consists of a list of structured questions related to the environmental parameters and specific human actions. They assist in ordering thinking, data collection, presentation and alert against the omission of possible impacts.
- Matrix (see section 6.1.2): The matrix analysis provides a holistic indication of the relationship and interaction between the various activities, development phases and the impact thereof on the environment. The method aims at providing a first order cause and effect relationship between the environment and the proposed activity. The matrix is designed to indicate the relationship between the different stressors and receptors which leads to specific impacts. The matrix also indicates the specialist studies that have been conducted to address potentially the most significant impacts.

6.1.1 Checklist analysis

The independent consultant conducted a site visit on 6 October 2022. The site visit was conducted to ensure a proper analysis of the site-specific characteristics of the study area. Table 6.1 provides a checklist, which is designed to stimulate thought regarding possible consequences of specific actions and so assist scoping of key issues. It consists of a list of

structured questions related to the environmental parameters and specific human actions. They assist in ordering thinking, data collection, presentation and alert against the omission of possible impacts. The table highlights certain issues, which are further analysed in matrix format in section 6.2.

Table 6.1: Environmental checklist

QUESTION	YES	NO	Un- sure	Description
1. Are any of the following located on the site earmarked for the development?				
I. A river, stream, dam or wetland	X			Two (02) small depressions (wetland feature) are located adjacent to the development area and the proposed development is expected to be situated within 32m from a watercourse.
II. A conservation or open space area		X		According to the Ecological Impact Assessment, a small portion of the southern section of the project area occurs within a CBA 1 and CBA 2, whilst the remaining majority of the site occurs within an ESA Thanda Tula Nature Reserve is located within 5km of the site.
III. An area that is of cultural importance		X		No sites, features or objects of cultural significance were identified
IV. Site of geological significance		X		None.
V. Areas of outstanding natural beauty		X		None.
VI. Highly productive agricultural land		X		None.
VII. Floodplain		X		None.
VIII. Indigenous Forest		X		None.
IX. Grass land	X			The topography of the project site is a combination of relatively flat open grassland plains interspersed with high lying rocky ridges, hills and slopes
X. Bird nesting sites		X		The Avifauna Impact Assessment (refer to Appendix E2) does not make any reference to nesting sites on the area earmarked for the development.

XI. Red data species		×		The Avifauna Impact Assessment (refer to Appendix E2) did not record any Red Data Species on site but indicated that some species of conservation concern may occur on site
XII. Tourist resort		×		None.
2. Will the project potentially result in potential?				
I. Removal of people		×		None.
II. Visual Impacts	×			The VIA (refer to Appendix E3) confirmed that the significance of the visual impact will be a "Negative Low Impact". The only receptors likely to be impacted by the proposed development are the nearby property owners, the town of Luckhoff and people travelling on the R48 regional road. S572 secondary road and an unnamed secondary road located to the west.
III. Noise pollution		×		Construction activities will result in the generation of noise over a period of 12-18 months. The noise impact is unlikely to be significant.
IV. Construction of an access road		×		It is recommended to access the site turning off the R48 onto the S572 towards the site.
V. Risk to human or valuable ecosystems due to explosion/fire/ discharge of waste into water or air.		×		None.
VI. Accumulation of large workforce (>50 manual workers) into the site.	×			Approximately 500 employment opportunities will be created during the construction phase and 50 employment opportunities during the operation phase of the SPP project.

VII. Utilisation of significant volumes of local raw materials such as water, wood etc.	×			The estimated maximum amount of water required during the facility's 20 years of production is approximately 9547kl per annum.
VIII. Job creation	×			Approximately 500 employment opportunities will be created during the construction phase and 50 employment opportunities during the operation phase of the SPP project.
IX. Traffic generation	×			It is estimated that 26 trips per day will be generated over the 12–18-month construction period for the SPP.
X. Soil erosion	×			The site will need to be cleared or graded to a limited extent, which may potentially result in a degree of dust being created, increased runoff and potentially soil erosion. The time that these areas are left bare will be limited to the construction phase, since vegetation will be allowed to grow back after construction.
XI. Installation of additional bulk telecommunication transmission lines or facilities		×		None.
3. Is the proposed project located near the following?				
I. A river, stream, dam or wetland	×			Two (02) small depressions (wetland feature) are located adjacent to the development area and the proposed development is expected to be situated within 32m from a watercourse.
II. A conservation or open space area		×		According to the Ecological Impact Assessment, a small portion of the southern section of the project area occurs within a CBA 1 and CBA 2, whilst the remaining majority of the site occurs within an ESA Thanda Tula Nature Reserve is located within 5km of the site.
III. An area that is of cultural importance		×		None.

IV. A site of geological significance		×		None.
V. An area of outstanding natural beauty		×		None.
VI. Highly productive agricultural land		×		None.
VII. A tourist resort	×			Thanda Tula Nature Reserve and lodge is located within 5km of the site.
VIII. A formal or informal settlement	×			The town of Luckhoff is located approximately 3km south of the proposed development.

6.1.2 Matrix analysis

The matrix describes the relevant listed activities, the aspects of the development that will apply to the specific listed activity, a description of the environmental issues and potential impacts, the significance and magnitude of the potential impacts and possible mitigation measures. The matrix also highlights areas of particular concern (see Table 6.2) for more in-depth assessment during the EIA process. An indication is provided of the specialist studies being conducted and which informed the initial assessment. Each cell is evaluated individually in terms of the nature of the impact, duration and its significance – should no mitigation measures be applied. This is important since many impacts would not be considered insignificant if proper mitigation measures were implemented.

In order to conceptualise the different impacts, the matrix specify the following:

- **Stressor:** Indicates the aspect of the proposed activity, which initiates and cause impacts on elements of the environment.
- **Receptor:** Highlights the recipient and most important components of the environment affected by the stressor.
- **Impacts:** Indicates the net result of the cause-effect between the stressor and receptor.
- **Mitigation:** Impacts need to be mitigated to minimise the effect on the environment.

Please refer to **Appendix E** (specialist studies) for a more in-depth assessment of the potential environmental impacts.

Table 6.2: Matrix analysis

For ease of reference the significance of the impacts is colour-coded as follow:

Low significance		Medium significance		High significance		Positive impact	
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LISTED ACTIVITY (The Stressor)	ASPECTS OF THE DEVELOPMENT /ACTIVITY	POTENTIAL IMPACTS		SIGNIFICANCE AND MAGNITUDE OF POTENTIAL IMPACTS							MITIGATION OF POTENTIAL IMPACTS			SPECIALIST STUDIES / INFORMATION	
		Receptors	Impact description / consequence	Minor	Major	Extent	Duration	Probability	Reversibility	Irreplaceable loss of resources	Possible Mitigation	Possible mitigation measures	Level of residual risk		
CONSTRUCTION PHASE															
<p><u>Activity 11(i) (GN.R. 327):</u> “The development of facilities or infrastructure for the transmission and distribution of electricity outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts.”</p> <p><u>Activity 12(ii)(a)(c) (GN.R. 327):</u> “The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (a) within a watercourse or (c) within 32 meters of a watercourse measured from the edge of a watercourse.”</p> <p><u>Activity 19 (GN.R. 327):</u> “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</p>	<p><u>Site clearing and preparation</u></p> <p>Certain areas of the site will need to be cleared of vegetation and some areas may need to be levelled.</p> <p><u>Civil works</u></p> <p>The main civil works are:</p> <ul style="list-style-type: none"> • Terrain levelling if necessary– Levelling will be minimal as the potential site chosen is relatively flat. • Laying foundation- The structures will be connected to the ground through cement pillars, cement slabs or metal screws. The exact method will depend on the detailed geotechnical analysis. • Construction of access and inside roads/paths – existing paths will be used where reasonably possible. Additionally, the turning 	BIOPHYSICAL ENVIRONMENT	Flora	<ul style="list-style-type: none"> • Loss of Northern Upper Karoo Vegetation • The clearing of vegetation for the construction of the SEF and associated infrastructure will result in the permanent loss of approximately 480ha of Northern Upper Karoo. • The extent of vegetation that will be impacted equates to 1.2% of the remaining extent of this vegetation unit. • The loss of this vegetation type, which is listed as Least Concern, will have an overall impact of low significance. • This impact is difficult to mitigate as the loss of vegetation is definite and permanent and as such the impact will remain of low significance even after mitigation measures have been implemented. 	-		S	LT	Pr	BR	ML	No	- See Table 6.3	L	Ecological Impact Assessment (Appendix E1)

<p>10 cubic metres from a watercourse.”</p> <p><u>Activity 24 (ii) (GN.R 327):</u> “The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters.”</p> <p><u>Activity 28(ii) (GN.R. 327):</u> “Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare.”</p> <p><u>Activity 56 (ii) (GN.R 327):</u> “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...”</p> <p><u>Activity 1 (GN.R. 325):</u> “The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more...”</p> <p><u>Activity 15 (GN.R. 325):</u> “The clearance of an area of 20 hectares or more of indigenous vegetation...”</p> <p><u>Activity 4 (b)(i)(ee)(gg) (GN.R 324):</u> “The development of a road wider than 4 metres with</p>	<p>circle for trucks will also be taken into consideration.</p> <p><u>Transportation and installation of PV panels into an Array</u></p> <p>The panels are assembled at the supplier’s premises and will be transported from the factory to the site on trucks. The panels will be mounted on metal structures which are fixed into the ground either through a concrete foundation or a deep-seated screw.</p> <p><u>Wiring to the Central Inverters</u></p> <p>Sections of the PV array will be wired to central inverters. The inverter is a pulse width mode inverter that converts direct current (DC) electricity to alternating current (AC) electricity at grid frequency.</p>		<p>Flora</p>	<ul style="list-style-type: none"> Loss of Plant Species of Conservation Concern No restricted range species or CR, EN or VU species were recorded within the site during the field survey. Additionally, the desktop assessment did not identify any SCC with a high likelihood of occurrence within the site. The impact is therefore negligible. 	Negligible		Not Applicable as impact is negligible					N/A	L	Ecological Impact Assessment (Appendix E1)
			Fauna and Flora	<ul style="list-style-type: none"> Fragmentation is one of the most important impacts on vegetation as it creates breaks in previously continuous vegetation, causing a reduction in the gene pool and a decrease in species richness and diversity. This impact occurs when more and more areas are cleared, resulting in the isolation of functional ecosystems, which results in reduced biodiversity and reduced movement due to the absence of ecological corridors. The infrastructure associated with the Photovoltaic Solar Facility, particularly the roads, will increase habitat fragmentation by creating breaks in the environment. However, the movement of species (fauna and seeds) will not be entirely prohibited due to the nature of the infrastructure and the ecological 	-	L	L	Pr	PR	ML	Yes	- See Table 6.3	L	Ecological Impact Assessment (Appendix E1)

<p>a reserve less than 13,5 metres within (b) the Free State, (i) outside urban areas, (ee) within critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans, (gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve, excluding disturbed areas.”</p> <p>Activity 10 (b)(i)(ee)(gg)(hh) (GN.R 324): “The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (b) in the Free State, (i) outside urban areas,(ee) critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans (gg) Areas within 10 kilometres from national parks or world heritage sites or 5</p>				functioning of the site can still be maintained.										
	Fauna			<ul style="list-style-type: none"> Loss of faunal habitat The clearing of vegetation for the construction of project infrastructure will result in the permanent loss of approximately 480ha of faunal habitat. This impact is difficult to mitigate as the loss of habitat is definite and permanent and as such the impact will remain even after mitigation measures have been implemented. 	-	L	LT	D	BR	ML	No	- See Table 6.3	L	Ecological Impact Assessment (Appendix E1)
	Fauna			<ul style="list-style-type: none"> Disturbance to Faunal Species Construction activities may generate noise, dust, vibrations and light pollution. This disturbance may cause faunal species to leave the area or disrupt foraging and/or breeding behaviour of those that remain. 	-	L	LT	Pr	BR	ML	No	- See Table 6.3	L	Ecological Impact Assessment (Appendix E1)

<p>kilometres from any other protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve and (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland.”</p> <p><u>Activity 12 (b)(ii)(iv) (GN.R 324):</u> “The clearance of an area of 300 square metres or more of indigenous vegetation (b) in the Free State, (ii) within critical biodiversity areas identified in bioregional plans (iv) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland.”</p> <p><u>Activity 14(ii)(a)(c)(b)(i)(ff)(hh) (GN.R 324):</u> “The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more, where such development occurs (a) within a watercourse or (c) within 32 metres of a watercourse, measured from the edge of a watercourse, (b) within the Free State, (i) outside urban areas within (ff) critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans (hh) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in</p>			Fauna	<ul style="list-style-type: none"> • Mortality of faunal species • Construction activities may inadvertently kill terrestrial vertebrate fauna during vegetation clearing, earth works and driving across the site. • Fauna perceived as dangerous may be persecuted out of fear. 	-		L	P	Po	I	ML	Yes	- See Table 6.3	M	Ecological Impact Assessment (Appendix E1)
			Fauna	<ul style="list-style-type: none"> • Loss of faunal species of conservation concern 	-		L	LT	Po	I	SL	Yes	- See Table 6.3	L	Ecological Impact Assessment (Appendix E1)
			Air	<ul style="list-style-type: none"> • Air pollution due to the increase of traffic of construction vehicles and the undertaking of construction activities. 	-		S	S	D	CR	NL	Yes	- Dust suppression measures must be implemented for heavy vehicles such as wetting of gravel roads on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers.	L	-
			Geology	<ul style="list-style-type: none"> • Collapsible soil. • Seepage. • Active soil (high soil heave). • Erodible soil. • Hard/compact geology. If the bedrock occurs close to surface it may present problems when driving solar panel columns. 	-	-	S	S	Pr	CR	NL	Yes	- The most effective mitigation will be the minimisation of the project footprint by using the existing roads in the area and not create new roads to prevent other	L	-

<p>terms of NEMPAA or from the core area of a biosphere reserve.”</p> <p>Activity 18 (b)(i)(gg)(hh) (GN.R 324): “The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (b) Free State (i) outside urban areas, within (gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core area of a biosphere reserve and (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland.”</p>				<ul style="list-style-type: none"> The presence of undermined ground. Instability due to soluble rock. Steep slopes or areas of unstable natural slopes. Areas subject to seismic activity. 								<p>areas also getting compacted.</p> <ul style="list-style-type: none"> Retention of vegetation where possible to avoid soil erosion. 		
	Existing services infrastructure			<ul style="list-style-type: none"> Generation of waste that need to be accommodated at a licensed landfill site. Generation of sewage that need to be accommodated by the local sewage plant. Increase in construction vehicles on existing roads. 	-	L	S	D	PR	ML	Yes	-	L	Confirmation from the Local Municipality
	Groundwater			<ul style="list-style-type: none"> Pollution due to construction vehicles and the storage and handling of dangerous goods. 	-	S	S	Pr	CR	ML	Yes	<ul style="list-style-type: none"> A groundwater monitoring programme (quality and groundwater levels) should be designed and installed for the site. Monitoring boreholes should be securely capped, and must be fitted with a suitable sanitary seal to prevent surface water flowing down the outside of the casing. Full construction details of monitoring boreholes must be recorded when they are drilled. Sampling of monitoring boreholes should be done according to recognised standards. 	L	-

			Aquatic Ecology	<ul style="list-style-type: none"> Loss of habitat containing protected species or Species of Special Concern Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones. Loss can also include a functional loss, through change in vegetation type via alien encroachment, reducing aquatic biodiversity. 	-		S	S	Po	PR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)
			Aquatic Ecology	<ul style="list-style-type: none"> Loss of CBAs or potential areas with conservation potential Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones and have been included in any Critical Biodiversity Areas 	-		S	S	Po	PR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)
			Aquatic Ecology	<ul style="list-style-type: none"> Potential spread of alien vegetation During construction, complete clearing of the PV panel areas, as well any ancillary structures (offices and substations) will be required. This disturbance then allows for the alien species to colonise the soils, if left unmanaged. 	-		S	S	Po	PR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)

			Aquatic Ecology	<ul style="list-style-type: none"> Loss of riparian and or wetland habitat During construction, complete clearing of the PV panel areas, as well any ancillary structures (offices and substations) will be required, which may impact the aquatic function or any corridors or connections between aquatic systems. However, these areas can be avoided by the proposed layout. 	-		S	S	Po	PR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)
			Aquatic Ecology	<ul style="list-style-type: none"> Changes to the hydrological regime and increase potential for erosion Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones and have been included in any Critical Biodiversity Areas 	-		S	S	Po	PR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)
			Aquatic Ecology	<ul style="list-style-type: none"> Changes to surface water quality characteristics During construction or decommissioning, earthworks will expose and mobilise earth materials, and a number of materials as well as chemicals will be imported and used on site and may end up in the surface water, including soaps, oils, grease and fuels, human wastes, cementitious wastes, paints and solvents, etc. 	-		S	S	Po	PR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)

				<ul style="list-style-type: none"> Any spills during transport or while works area conducted in proximity to a watercourse has the potential to affect the surrounding biota. This can result in possible deterioration in aquatic ecosystem integrity and species diversity. 														
			General Environment (risks associated with BESS)	<ul style="list-style-type: none"> Mechanical breakdown / Exposure to high temperatures Fires, electrocutions and spillage of toxic substances into the surrounding environment. Spillage of hazardous substances into the surrounding environment. Soil contamination – leachate from spillages which could lead to an impact of the productivity of soil forms in affected areas. Water Pollution – spillages into surrounding watercourses as well as groundwater. Health impacts – on the surrounding communities, particularly those relying on watercourses (i.e., rivers, streams, etc) as a primary source of water. Generation of hazardous waste 	-	S	M	Pr	PR	ML	Yes	<ul style="list-style-type: none"> Operators are trained and competent to operate the BESS. Training should include the discussion of the following: <ul style="list-style-type: none"> Potential impact of electrolyte spills on groundwater; Suitable disposal of waste and effluent; Key measures in the EMPr relevant to worker’s activities; How incidents and suggestions for improvement can be reported. Training records should be kept on file and be made available during audits. Battery supplier user manuals safety specifications and Material Safety Data Sheets (MSDS) are filed on site at all times. 	L	-				

													<ul style="list-style-type: none"> - Compile method statements for approval by the Technical/SHEQ Manager for the operation and management and replacement of the battery units / electrolyte for the duration of the project life cycle. Method statements should be kept on site at all times. - Provide signage on site specifying the types of batteries in use and the risk of exposure to hazardous material and electric shock. Signage should also specify how electrical and chemical fires should be dealt with by first responders, and the potential risks to first responders (e.g. the inhalation of toxic fumes, etc.). - Firefighting equipment should readily be available at the BESS area and within the site. - Maintain strict access control to the BESS area. - Ensure all maintenance contractors / staff are familiar with the 	
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												<p>BESS to ensure issues are identified timeously and addressed with the supplier where relevant.</p> <ul style="list-style-type: none"> - The applicant in consultation with the supplier must compile and implement a Leak and Detection Monitoring Programme during the project life cycle of the BESS. - Batteries must be strictly maintained by the supplier or suitably qualified persons for the duration of the project life cycle. No unauthorised personnel should be allowed to maintain the BESS. - Damaged and used batteries must be removed from site by the supplier or any other suitably qualified professional for recycling or appropriate disposal. - The applicant should obtain a cradle to grave battery management plan from the supplier during the planning and design phase of the system. The plan 	
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													must be kept on site and adhered to.		
SOCIAL/ECONOMIC ENVIRONMENT	Local unemployment rate	<ul style="list-style-type: none"> Job creation. Business opportunities. Skills development. 	+	L	S	D	CR	NL	Yes	-	See Table 6.3	M	Social Impact Assessment (Appendix E7)		
	Economic multiplier effects	<ul style="list-style-type: none"> Significance of the impact from the economic multiplier effects from the use of local goods and services. 	+	P	S	D	CR	NL	Yes	-	See Table 6.3	M	Social Impact Assessment (Appendix E7)		
	Improvements on shared infrastructure	<ul style="list-style-type: none"> Investment into upgrading and maintain shared infrastructure such as roads and stormwater infrastructure on farms may benefit farming operations 	+	P	S	D	CR	NL	Yes	-	See Table 6.3	M	Social Impact Assessment (Appendix E7)		
	Potential loss of productive farmland	<ul style="list-style-type: none"> The potential loss in productive farmland during the construction phase, due to factors such as the construction of roads, the preparation of foundations, power lines, offices etc. 	-	S	S	Po	PR	ML	Yes	-	See Table 6.3	L	Social Impact Assessment (Appendix E7)		
	Influx of jobseekers and change in population in the study area.	<ul style="list-style-type: none"> In-migration of labourers in search of employment opportunities, and a resultant change in population, and increase in pressure on local resources and social networks, or existing services and infrastructure 	-	L	L	Pr	I	SL	Yes	-	See Table 6.3	L	Social Impact Assessment (Appendix E7)		
	Safety and security impacts	<ul style="list-style-type: none"> Temporary increase in safety and security concerns associated with the influx of people during the construction phase 	-	L	S	U	CR	NL	Yes	-	See Table 6.3	L	Social Impact Assessment (Appendix E7)		
	Daily living and movement patterns	<ul style="list-style-type: none"> Temporary increase in traffic disruptions and movement patterns during the construction phase. 	-	P	S	Pr	PR	NL	Yes	-	See Table 6.3	L	Social Impact Assessment (Appendix E7)		

			Nuisance impacts (noise and dust)	<ul style="list-style-type: none"> Nuisance impacts in terms of temporary increase in noise and dust, and wear and tear on access roads to the site. 	-		L	S	Pr	CR	NL	Yes	- See Table 6.3	L	Social Impact Assessment (Appendix E7)	
			Increased risk of potential veld fires	<ul style="list-style-type: none"> The potential loss of livestock, crops, and farmsteads in the area. This also includes the damage and loss of farm infrastructure and the threatening of human lives that are associated with the increased risk of veld fires 	-		S	S	Pr	CR	ML	Yes	- See Table 6.3	L	Social Impact Assessment (Appendix E7)	
			Sense of place	<ul style="list-style-type: none"> Intrusion impacts from construction activities will have an impact on the area's "sense of place". 	-		L	S	Pr	CR	NL	Yes	- See Table 6.3	L	Social Impact Assessment (Appendix E7)	
			Visual landscape	<ul style="list-style-type: none"> Visual impact of construction activities on sensitive visual receptors in close proximity to the SEF 	-		L	S	Po	CR	NL	Yes	- See Table 6.3	L	Visual Impact Assessment (Appendix E3)	
			Traffic volumes	<ul style="list-style-type: none"> Increase in development trips for the duration of the construction Phase Associated noise, dust and exhaust pollution 	-		L	M	D	CR	NL	Yes	- See Table 6.3	L	Traffic Impact Assessment (Appendix E8)	
			Tourism industry	<ul style="list-style-type: none"> Since there are no sensitive tourism facilities in close proximity to the site, the proposed activities will not have an impact on tourism in the area. 	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			Heritage resources	<ul style="list-style-type: none"> As no sites, features or objects of cultural historic significance have been identified in the project area, there would be no impact as a result of the proposed development 	+		S	S	U	CR	NL	N/A	- For the current study, as no sites, features or objects of cultural significance were identified, no mitigation measures are proposed.	L	Heritage Impact Assessment (Appendix E5)	

			Paleontological Heritage	<ul style="list-style-type: none"> Destroy or permanently seal-in fossils at or below the surface that are then no longer available for scientific study 	-	S	P	U	-	IR	N/A	N/A	L	Paleontological Impact Assessment (Appendix E6)
OPERATIONAL PHASE														
<p><u>Activity 11(i) (GN.R. 327):</u> "The development of facilities or infrastructure for the transmission and distribution of electricity outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts."</p> <p><u>Activity 12(ii)(a)(c) (GN.R. 327):</u> "The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (a) within a watercourse or (c) within 32 meters of a watercourse measured from the edge of a watercourse."</p> <p><u>Activity 1 (GN.R 325):</u> "The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more."</p> <p><u>Activity 10 (b)(i)(ee)(gg)(hh) (GN.R 324):</u> "The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (b)</p>	<p><u>Habitat disturbance</u></p> <p>Habitat disturbance as a result of construction and operational activities</p> <p>The key components of the proposed project are described below:</p> <ul style="list-style-type: none"> <u>PV Panel Array</u> - To produce up to 240MW, the proposed facility will require numerous linked cells placed behind a protective glass sheet to form a panel. Multiple panels will be required to form the solar PV arrays which will comprise the PV facility. The PV panels will be tilted at a northern angle in order to capture the most sun or using one-axis tracker structures to follow the sun to increase the yield. <u>Electrical reticulation network</u> - Energy generated by the PV array will be transmitted via underground medium voltage cables (i.e., up to 33kV) to the onsite Luckhoff Solar 3 substation 	BIOPHYSICAL ENVIRONMENT	Flora	<ul style="list-style-type: none"> Infestation of Alien Plant Species If laydown areas and roads are not rehabilitated, these disturbed areas can become places for alien invasive species to become established, and if left unmitigated, these species can spread and establish themselves in intact vegetation, resulting in the displacement of indigenous species and possible local extinctions of SCC. Three exotic species (<i>Schinus molle</i>, <i>Argemone ochroleuca</i> and <i>Cymbopogon pospischilii</i>) were recorded within the project site. <i>Argemone ochroleuca</i> is listed as a Category 1b species. 	-	L	M	Po	CR	SL	Yes	- See Table 6.4	L	Ecological Impact Assessment (Appendix E1)
			Fauna	<ul style="list-style-type: none"> Disturbance to Faunal Species Operation activities may generate disturbance to faunal species disrupting foraging and/or breeding behaviour. 	-	L	L	Pr	BR	ML	Yes	- See Table 6.4	L	Ecological Impact Assessment (Appendix E1)
			Fauna	<ul style="list-style-type: none"> Mortality of faunal species Operation activities may kill terrestrial vertebrate fauna specifically driving across the site. 	-	L	P	Po	I	ML	Yes	- See Table 6.4	M	Ecological Impact Assessment (Appendix E1)

<p><i>in the Free State, (i) outside urban areas,(ee) critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans (gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve and (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."</i></p>	<p>(the onsite facility substation) where it will be stepped-up to 132kV. Thereafter, the electricity will pass to offsite facility substation infrastructure (~150 m east of the facility) via a 132kV overhead powerline</p> <ul style="list-style-type: none"> • <u>Supporting Infrastructure</u> – The following auxiliary buildings including a gate house, ablutions, workshops, storage and warehousing areas, site offices and a control centre. The project requires the need for both temporary and permanent laydown areas • <u>Roads</u> – The majority of the access road will follow existing, gravel farm roads that may require widening up to 6 -10 m (inclusive of storm water infrastructure). Where new sections of road need to be constructed (lengthened), this will be gravel/hard surfaced access road and only tarred if necessary. A network of gravel internal access roads and a perimeter road of up to 33 km, each with a width of up to 6 m, will be constructed to provide access to the various components of the PV development. Access will be obtained via the S572 off the R48, an 	<p>SOCIAL/E CONOMIC</p>		<ul style="list-style-type: none"> • Fauna perceived as dangerous may be persecuted out of fear. 												
			Air quality	<ul style="list-style-type: none"> • The proposed development will not result in any air pollution during the operational phase. 	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			Geology	<ul style="list-style-type: none"> • Collapsible soil. • Active soil (high soil heave). • Erodible soil. • Hard/compact geology. If the bedrock occurs close to surface it may present problems when driving power line columns. • The presence of undermined ground. • Instability due to soluble rock. • Steep slopes or areas of unstable natural slopes. • Areas subject to seismic activity. • Areas subject to flooding. 	-		S	S	Po	PR	ML	Yes	<ul style="list-style-type: none"> - Surface drainage should be provided to prevent water ponding. - Mitigation measures proposed by the detailed engineering geological investigation should be implemented. 	L	-	
			Groundwater	<ul style="list-style-type: none"> • Leakage of hazardous materials. The development will comprise of a distribution substation and will include transformer bays which will contain transformer oils. Leakage of these oils can contaminate water supplies. 	-		L	L	Po	PR	ML	Yes	<ul style="list-style-type: none"> - All areas in which substances potentially hazardous to groundwater are stored, loaded, worked with or disposed of should be securely bunded (impermeable floor and sides) to prevent accidental discharge to groundwater. 	L	-	
			Aquatic Ecology	<ul style="list-style-type: none"> • Potential spread of alien vegetation 	-		S	S	Po	PR	NL	Yes	<ul style="list-style-type: none"> - See Table 6.4 	L	Aquatic Ecological Assessment (Appendix E1)	
Employment opportunities	<ul style="list-style-type: none"> • The creation of employment opportunities and skills development 		+	P	L	D	I	NL	Yes	<ul style="list-style-type: none"> - See Table 6.4 	M	Social Impact Assessment (Appendix E7)				

<p>existing gravel road located adjacent to the site.</p> <ul style="list-style-type: none"> Fencing - For health, safety and security reasons, the facility will be required to be fenced off from the surrounding farm. Fencing with a height of 3.5 meters will be used. 	and skills development	opportunities during the operation phase for the country and local economy.																	
	Development of non-polluting, renewable energy infrastructure	<ul style="list-style-type: none"> Development of non-polluting, renewable energy infrastructure 																Social Impact Assessment (Appendix E7)	
	Loss of agricultural land and overall productivity	<ul style="list-style-type: none"> Loss of agricultural land and overall productivity as a result of the operation of the proposed project on an agricultural property. 																	Social Impact Assessment (Appendix E7)
	Contribution to LED and social upliftment	<ul style="list-style-type: none"> Contribution to LED and social upliftment during the operation of the project 																	Social Impact Assessment (Appendix E7)
	Impact on tourism	<ul style="list-style-type: none"> The potential impact on tourism due to the establishment of the Luckhoff Solar 3 SEF 																	Social Impact Assessment (Appendix E7)
	Sense of place	<ul style="list-style-type: none"> Visual impacts and sense of place impacts associated with the operation phase of Luckhoff Solar 3 SEF. 																	Social Impact Assessment (Appendix E7)
	Increase in household earnings	<ul style="list-style-type: none"> The creation of employment opportunities and skills development opportunities during the operation phase for the households involved in the project would create an opportunity for an increase in household earnings. 																	Social Impact Assessment (Appendix E7)
	Visual landscape	<ul style="list-style-type: none"> Visual impact on sensitive visual receptors within a 1km radius from the SEF 																	Visual Impact Assessment (Appendix E3)
	Visual landscape	<ul style="list-style-type: none"> Visual impact on sensitive visual receptors between a 1km and 3km radius from the SEF 																	Visual Impact Assessment (Appendix E3)

			Visual landscape	<ul style="list-style-type: none"> Visual impact on sensitive visual receptors within a 3-5km radius from the SEF 	-		L	L	U	PR	ML	Yes	- See Table 6.4	L	Visual Impact Assessment (Appendix E3)
			Visual landscape	<ul style="list-style-type: none"> Visual impact on sensitive visual receptors within a 5-10km radius from the SEF 	-		L	L	U	CR	NL	Yes	- See Table 6.4	L	Visual Impact Assessment (Appendix E3)
			Visual landscape	<ul style="list-style-type: none"> Visual impacts of lighting at night on sensitive visual receptors in close proximity to the proposed facility 	-		L	L	U	CR	NL	Yes	- See Table 6.4	L	Visual Impact Assessment (Appendix E3)
			Visual landscape	<ul style="list-style-type: none"> Visual impacts of glint and glare as a visual distraction and possible air travel hazard 	-		L	L	U	CR	NL	Yes	- See Table 6.4	L	Visual Impact Assessment (Appendix E3)
			Visual landscape	<ul style="list-style-type: none"> Visual impacts on sense of place associated with the operational phase of the SEF 	-		L	L	Po	CR	ML	Yes	- See Table 6.4	L	Visual Impact Assessment (Appendix E3)
			Traffic volumes	<ul style="list-style-type: none"> Slight increase in trips due to permanent staff on site. Increase in trips around twice a year for transport of water to site for the cleaning of solar panels (water source to be clarified – borehole or transported to site / size of water tankers if water is to be delivered on site). 	-		L	S	Pr	CR	NL	Yes	- See Table 6.4	L	Traffic Impact Assessment (Appendix E8)
			Health & Safety	<ul style="list-style-type: none"> The proposed development will not result in any health and safety impacts during the operational phase. 	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	-	N/A	N/A
			Noise levels	<ul style="list-style-type: none"> The proposed development will not result in any noise pollution during the operational phase. 	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			Heritage resources	<ul style="list-style-type: none"> As no sites, features or objects of cultural historic significance have been 	+		S	S	U	CR	NL	N/A	For the current study, as no sites, features or objects of cultural	L	Heritage Impact

				identified in the project area, there would be no impact as a result of the proposed development								significance were identified, no mitigation measures are proposed.		Assessment (Appendix E5)	
			Electricity supply	<ul style="list-style-type: none"> Generation of additional electricity. The power line will transport generated electricity into the grid. 	+		I	L	D	I	N/A	Yes	-	N/A	-
			Electrical infrastructure	<ul style="list-style-type: none"> Additional electrical infrastructure. The proposed solar facility will add to the existing electrical infrastructure and aid to lessen the reliance of electricity generation from coal-fired power stations. 	+		I	L	D	I	N/A	Yes	-	N/A	-
DECOMMISSIONING PHASE															
-	<p><u>Dismantlement of infrastructure</u></p> <p>During the decommissioning phase the Solar PV Energy facility and its associated infrastructure will be dismantled.</p> <p><u>Rehabilitation of biophysical environment</u></p> <p>The biophysical environment will be rehabilitated.</p>	BIOPHYSICAL ENVIRONMENT	Flora	<ul style="list-style-type: none"> Loss of Indigenous Vegetation The decommissioning of the Photovoltaic Solar Facility will require laydown areas and will disrupt vegetation that has re-established around the areas that were disturbed during the construction phase. The loss of vegetation will be similar to the construction phase impacts. 	-		S	L	P	BR	ML	Yes	- See Table 6.5	L	Ecological Impact Assessment (Appendix E1)
			Fauna	<ul style="list-style-type: none"> Disturbance to Faunal Species Decommissioning activities may generate disturbance to faunal species disrupting foraging and/or breeding behaviour. 	-		L	L	Pr	BR	ML	Yes	- See Table 6.5	L	Ecological Impact Assessment (Appendix E1)
			Fauna	<ul style="list-style-type: none"> Mortality of faunal species Decommissioning activities may kill terrestrial 	-		L	P	Po	I	ML	Yes	- See Table 6.5	L	Ecological Impact

				vertebrate fauna specifically driving across the site. <ul style="list-style-type: none"> Fauna perceived as dangerous may be persecuted out of fear 											Assessment (Appendix E1)
			Air quality	<ul style="list-style-type: none"> Air pollution due to the increase of traffic of construction vehicles. 	-		S	S	D	CR	NL	Yes	- Regular maintenance of equipment to ensure reduced exhaust emissions.	L	-
			Geology	<ul style="list-style-type: none"> It is not foreseen that the decommissioning phase will impact on the geology of the site or vice versa. 	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			Existing services infrastructure	<ul style="list-style-type: none"> Generation of waste that needs to be accommodated at a licensed landfill site. Generation of sewage that needs to be accommodated by the municipal sewerage system and the local sewage plant. Increase in construction vehicles. 	-		L	S	D	I	NL	Yes	-	L	-
			Groundwater	<ul style="list-style-type: none"> Pollution due to construction vehicles. 	-		S	S	Pr	CR	ML	Yes	-	L	-
			Aquatic Ecology	<ul style="list-style-type: none"> Loss of habitat containing protected species or Species of Special Concern Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones. Loss can also include a functional loss, through change in vegetation type 	-		S	S	Po	PR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)

				via alien encroachment, reducing aquatic biodiversity.													
			Aquatic Ecology	<ul style="list-style-type: none"> Loss of CBAs or potential areas with conservation potential Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones and have been included in any Critical Biodiversity Areas 	-	S	S	Po	PR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)			
			Aquatic Ecology	<ul style="list-style-type: none"> Loss of riparian and or wetland habitat During construction/decommissioning, complete clearing of the PV panel areas, as well any ancillary structures (offices and substations) will be required, which may impact the aquatic function or any corridors or connections between aquatic systems. However, these areas can be avoided by the proposed layout. 	-	S	S	Po	PR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)			
			Aquatic Ecology	<ul style="list-style-type: none"> Changes to the hydrological regime and increase potential for erosion Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within 	-	S	S	Po	PR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)			

			the buffer zones and have been included in any Critical Biodiversity Areas											
		Aquatic Ecology	<ul style="list-style-type: none"> Changes to surface water quality characteristics During construction or decommissioning, earthworks will expose and mobilise earth materials, and a number of materials as well as chemicals will be imported and used on site and may end up in the surface water, including soaps, oils, grease and fuels, human wastes, cementitious wastes, paints and solvents, etc. Any spills during transport or while works area conducted in proximity to a watercourse has the potential to affect the surrounding biota. This can result in possible deterioration in aquatic ecosystem integrity and species diversity. 	-		S	S	Po	PR	NL	Yes	- See Table 6.3	L	Aquatic Ecological Assessment (Appendix E1)
		Traffic volumes	<ul style="list-style-type: none"> Increase in development trips for the duration of the construction Phase Associated noise, dust and exhaust pollution 	-		L	M	D	CR	NL	Yes	- See Table 6.3	L	Traffic Impact Assessment (Appendix E8)
		Tourism industry	<ul style="list-style-type: none"> Since there are no tourism facilities in close proximity to the site, the decommissioning activities will not have an impact on tourism in the area. 	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Nature of the impact:	(N/A) No impact	(+) Positive Impact (-)	Negative Impact		
Geographical extent:	(S) Site;	(L) Local/District;	(P) Province/Region;	(I) International and National	
Probability:	(U) Unlikely;	(Po) Possible;	(Pr) Probable;	(D) Definite	
Duration:	(S) Short Term;	(M) Medium Term;	(L) Long Term;	(P) Permanent	
Intensity / Magnitude:	(L) Low;	(M) Medium;	(H) High;	(VH) Very High	
Reversibility:	(CR) Completely Reversible;	(PR) Partly Reversible;	(BR) Barely Reversible;	-	
Irreplaceable loss of resources:	(IR) Irreversible	(NL) No Loss;	(ML) Marginal Loss;	(SL) Significant Loss;	(CL) Complete Loss
Level of residual risk:	(L) Low;	(M) Medium;	(H) High;	(VH) Very High	-

6.2 KEY ISSUES IDENTIFIED

From the above it is evident that mitigation measures should be available for potential impacts associated with the proposed activity and development phases. The scoping methodology identified the following key issues which should be addressed in more detail in the EIA report.

6.2.1 Impacts during the construction phase

During the construction phase the following activities will have various potential impacts on the biophysical and socio-economic environment:

- Activity 11(i) (GN.R. 327): *“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.”*
- Activity 12(ii)(a)(c) (GN.R. 327): *“The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (a) within a watercourse or (c) within 32 meters of a watercourse measured from the edge of a watercourse.”*
- Activity 19 (GN.R. 327): *“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.”*
- Activity 24 (ii) (GN.R 327): *“The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters.”*
- Activity 28(ii) (GN.R. 327): *“Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare.”*
- Activity 56 (ii) (GN.R 327): *“ 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...”*
- Activity 1 (GN.R. 325): *“The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more...”*
- Activity 15 (GN.R. 325): *“The clearance of an area of 20 hectares or more of indigenous vegetation...”*
- Activity 4 (b)(i)(ee)(gg) (GN.R 324): *“The development of a road wider than 4 metres with a reserve less than 13,5 metres within (b) the Free State, (i) outside urban areas, (ee) within critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans, (gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve, excluding disturbed areas.”*

- Activity 10 (b)(i)(ee)(gg)(hh) (GN.R 324): *“The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (b) in the Free State, (i) outside urban areas,(ee) critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans (gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve and (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland.”*
- Activity 12 (b)(ii)(iv) (GN.R 324): *“The clearance of an area of 300 square metres or more of indigenous vegetation (b) in the Free State, (ii) within critical biodiversity areas identified in bioregional plans (iv) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland.”*
- Activity 14(ii)(a)(c)(b)(i)(ff)(hh) (GN.R 324): *“The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more, where such development occurs (a) within a watercourse or (c) within 32 metres of a watercourse, measured from the edge of a watercourse, (b) within the Free State, (i) outside urban areas within (ff) critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans (hh) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core area of a biosphere reserve.”*
- Activity 18 (b)(i)(gg)(hh) (GN.R 324): *“The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (b) Free State (i) outside urban areas, within (gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core area of a biosphere reserve and (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland.”*

During the construction phase temporary negative impacts are foreseen over the short term. Table 6.3 summarizes the potentially most significant impacts and the mitigation measures that are proposed during the construction phase.

Table 6.3: Impacts and the mitigation measures during the construction phase

SPECIALIST STUDY	IMPACT	PRE-MITIGATION RATING	POST MITIGATION RATING	SUMMARY OF MITIGATION MEASURES
Ecological Impact Assessment (Appendix E1)	<p>Loss of Northern Upper Karoo</p> <p>The clearing of vegetation for the construction of the SEF and associated infrastructure will result in the permanent loss of approximately 480ha of Northern Upper Karoo. The extent of vegetation that will be impacted equates to 1.2% of the remaining extent of this vegetation unit. The loss of this vegetation type, which is listed as Least Concern, will have an overall impact of low significance. This impact is difficult to mitigate as the loss of vegetation is definite and permanent and as such the</p>	Negative Low	Negative Low	<ul style="list-style-type: none"> • Construction vehicles and machinery must not encroach into identified 'no-go' areas or areas outside the project footprint. • Topsoil (20 cm, where possible) must be collected and stored in an area of low (preferable) and medium sensitivity and used to rehabilitate impacted areas that are no longer required during the operational phase (e.g., laydown areas). • Only indigenous species must be used for rehabilitation. • Where possible, lay down areas must be located within previously disturbed sites. • Employees must be prohibited from making open fires during the construction phase. • Employees must be prohibited from collecting plants. It is recommended that spot checks of pockets and bags are done on a regular basis to ensure that no unlawful harvesting of plant species is occurring. • An alien invasive management plan for the site must be created. • An in-situ search and rescue plan must be developed and implemented for succulents and geophytes that will be impacted by the construction of the project site. • Plant translocation to adjacent suitable habitat may only be done for species that are not range restricted and for populations that have not been quantified as regionally significant.

	<p>impact will remain of low significance even after mitigation measures have been implemented.</p>			<ul style="list-style-type: none"> In such cases that this is not feasible, any requirement for translocation must be discussed with the relative authorities prior to translocation taking place.
	<p>Loss of faunal habitat</p> <p>The clearing of vegetation for the construction of project infrastructure will result in the permanent loss of approximately 480ha of faunal habitat. This impact is difficult to mitigate as the loss of habitat is definite and permanent and as such the impact will remain even after mitigation measures have been implemented.</p>	<p>Negative Low</p>	<p>Negative Low</p>	<ul style="list-style-type: none"> Existing roads must be used as far as possible and road networks consolidated. Construction vehicles and machinery must not encroach into areas outside the project footprint. Where possible, lay down areas must be located within previously disturbed sites. Employees must be prohibited from making open fires during the construction phase.
	<p>Disturbance to terrestrial vertebrate faunal species that may use the site and immediate surrounds</p> <p>Construction activities may generate noise, dust, vibrations and light pollution. This disturbance may cause faunal species to</p>	<p>Negative Low</p>	<p>Negative Low</p>	<ul style="list-style-type: none"> Any fencing required must be wildlife permeable especially at strategic places such as along drainage lines. This allows for small and small-medium sized animals to move between their natural habitat unencumbered. If electrified strands are to be used, there must be no strands within 30 cm of the ground. As an example, if a tortoise touches this strand it automatically retreats into its shell and does not move because it senses danger, and the repeated shocks eventually kill it (Arnot & Moteno, 2017).

	<p>leave the area or disrupt foraging and/or breeding behaviour of those that remain.</p>			<ul style="list-style-type: none"> • Ensure walls allow access for small fauna (openings at the base at intervals) within the developed area. • External night lighting must be down lights, placed as low to the ground as possible and of low UV emitting lights, such as most LEDs. Lighting in open space areas within development must be minimised. This is to avoid attracting insects and their predators to the lights and minimising unnecessary mortalities. • Vehicles and machinery must meet best practice standards in terms of noise • Dust suppression techniques such as road watering required during windy periods • Minimise barriers to faunal movement (construct side walls of pavements, gutters, and trenches with a gradual slope and not at right angles to allow small faunal species to exit).
	<p>Loss of Plant Species of Conservation Concern</p> <p>No restricted range species or CR, EN or VU species were recorded within the site during the field survey. Additionally, the desktop assessment did not identify any SCC with a high likelihood of occurrence within the site. The impact is therefore negligible.</p>	Negligible	Negligible	<ul style="list-style-type: none"> • N/A

	<p>Loss of faunal Species of Conservation Concern</p> <p>Only one faunal SCC has a high likelihood of occurrence, the NT African Striped Weasel (<i>Poecilogale albinucha</i>). Although listed this species has a large distribution and considered locally common.</p>	Negative Low	Negative Low	<ul style="list-style-type: none"> • A clause must be included in contracts for all personnel working on site stating that: “no wild animals will be hunted, killed, poisoned or captured. No wild animals will be imported into, exported from or transported in or through the province. No wild animals will be sold, bought, donated and no person associated with the development will be in possession of any live wild animal, carcass or anything manufactured from the carcass.” A clause relating to fines, possible dismissal and legal prosecution must be included should any of the above transgressions occur.
	<p>Disruption of Ecosystem Function and Process</p> <p>Fragmentation is one of the most important impacts on vegetation as it creates breaks in previously continuous vegetation, causing a reduction in the gene pool and a decrease in species richness and diversity. This impact occurs when more and more areas are cleared, resulting in the isolation of functional ecosystems, which results in reduced</p>	Negative Low	Negative Low	<ul style="list-style-type: none"> • In addition to the mitigation measures listed under impact 1, the following should be implemented: <ul style="list-style-type: none"> ○ Rehabilitate laydown areas ○ Use existing access roads and upgrade these where necessary

	<p>biodiversity and reduced movement due to the absence of ecological corridors.</p> <p>The infrastructure associated with the Photovoltaic Solar Facility, particularly the roads, will increase habitat fragmentation by creating breaks in the environment. However, the movement of species (fauna and seeds) will not be entirely prohibited due to the nature of the infrastructure and the ecological functioning of the site can still be maintained.</p>			
	<p>Mortality of faunal species due to accidental death and/or persecution</p> <p>Construction activities may inadvertently kill terrestrial vertebrate fauna during vegetation clearing, earth</p>	<p>Negative Medium</p>	<p>Negative Low</p>	<ul style="list-style-type: none"> • During construction induction material must iterate safety to fauna and personnel through avoidance of wildlife. • Speed restrictions within the development for all vehicles (30km/h is recommended) should be in place to reduce the impact of killed fauna on the project roads. • Any terrestrial vertebrate fauna found on site during construction must be relocated to habitat immediately adjacent to the development and should these be SCC recorded on iNaturalist.

	works and driving across the site. Fauna perceived as dangerous may be persecuted out of fear.			<ul style="list-style-type: none"> • A snake handler should be on call to provide removal and relocation service should any snakes be found on site or in neighbouring homes, note that October is when snakes are most active as they emerge from hibernation. • Mortality of terrestrial vertebrate species on roads must be monitored and reported (carcasses need to be collected and frozen and circumstances of roadkill investigated).
Avifauna Impact Assessment (Appendix E2)	Displacement of priority avian species from important habitats (PV array and associated infrastructure)	Negative High	Negative Medium	<ul style="list-style-type: none"> • It is difficult to mitigate against the loss of habitat since clearing of vegetation (or habitat) will be required for the infrastructure associated with the project. The PV facilities and associated infrastructure occur predominantly on habitat types of medium sensitivity. The best practicable mitigation will be to consolidate infrastructure. • Avoid and buffer areas where threatened bird species occur (e.g., Secretarybird and Ludwig's Bustard – to be confirmed during the EIA/baseline surveys). • All road networks must be planned with care to minimise dissection or fragmentation of important avifaunal habitat type. Where possible, the use of existing roads is encouraged.
	Displacement of resident avifauna through increased disturbance (PV array and associated infrastructure)	Negative High	Negative Medium	<ul style="list-style-type: none"> • It is difficult to mitigate against the loss of habitat since clearing of vegetation (or habitat) will be required for the infrastructure associated with the project. The PV facilities and associated infrastructure occur predominantly on habitat types of medium sensitivity. The best practicable mitigation will be to consolidate infrastructure. • All road networks must be planned with care to minimise dissection or fragmentation of important avifaunal habitat type. Where possible, the use of existing roads is encouraged.

	Loss of important avian habitats (PV array and associated infrastructure)	Negative High	Negative Medium	<ul style="list-style-type: none"> • It is difficult to mitigate against the loss of habitat since clearing of vegetation (or habitat) will be required for the infrastructure associated with the project. The PV facilities and associated infrastructure occur predominantly on habitat types of medium sensitivity. The best practicable mitigation will be to consolidate infrastructure. • Avoid and buffer habitat with high preliminary avian sensitivities. Where necessary, relocate or remove artificial watering points.
	Displacement of priority avian species from important habitats (Power Line)	Negative High	Negative Medium	<ul style="list-style-type: none"> • It is difficult to mitigate against the loss of habitat since clearing of vegetation (or habitat) will be required for the infrastructure associated with the project. The grid connection infrastructure occurs predominantly on habitat types of medium sensitivity. The best practicable mitigation will be to consolidate infrastructure (e.g. proposed powerline) to areas where existing impacts occur (e.g. placing the proposed powerline alongside existing powerlines). • Conduct a “walk-through” of the powerline servitude to identify potential areas where threatened bird species utilise the area – either re-align the powerline or move pylon footprints. • All road networks must be planned with care to minimise dissection or fragmentation of important avifaunal habitat type. Where possible, the use of existing roads is encouraged
	Displacement of resident avifauna through increased disturbance (Power Line)	Negative Medium	Negative Low	<ul style="list-style-type: none"> • It is difficult to mitigate against the loss of habitat since clearing of vegetation (or habitat) will be required for the infrastructure associated with the project. The grid connection infrastructure occurs predominantly on habitat types of medium sensitivity. The best practicable mitigation will be to consolidate infrastructure (e.g., proposed powerline) to areas where existing impacts occur (e.g., placing the proposed powerline alongside existing powerlines).

				<ul style="list-style-type: none"> All road networks must be planned with care to minimise dissection or fragmentation of important avifaunal habitat type. Where possible, the use of existing roads is encouraged
	Loss of important avian habitats (Power Line)	Negative Medium	Negative Low	<ul style="list-style-type: none"> Avoid and buffer habitat with high preliminary avian sensitivities. Where necessary, relocate or remove artificial watering points. Conduct a “walk-through” of the powerline servitude to identify potential areas where threatened bird species utilise the area – either re-align the powerline or move pylon footprints.
Aquatic Ecological Assessment (Appendix E1)	Loss of habitat containing protected species or Species of Special Concern	Negative Medium	Negative Low	<p>Mitigation measures to reduce residual risk or enhance opportunities:</p> <ul style="list-style-type: none"> A pre-construction walkthrough with an aquatic specialist is recommended and they can assist with the development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to micro-siting of the final layout. Where large cut and fill areas are required these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation. Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc). <p>To minimise the impact of the access roads:</p> <ul style="list-style-type: none"> Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible. Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Any unnecessary intrusion into these areas is prohibited. Where intrusion

				<p>is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.</p> <ul style="list-style-type: none"> • Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils. • All pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that headcut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert. • The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist during a pre-construction walkdown. • Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities. • Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.
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				<ul style="list-style-type: none"> All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated. It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.
	Loss of CBAs or potential areas with conservation potential	Negative Medium	Negative Low	<p>Mitigation measures to reduce residual risk or enhance opportunities:</p> <ul style="list-style-type: none"> The aquatic systems have been mapped to a finer scale and have taken cognizance of any potential CBAs. If High / No-Go are avoided by the major infrastructure, then aquatic zones associated with the development can be avoided, noting that at Present the Free State Province does not have any spatial data on Aquatic CBAs A pre-construction walkthrough with an aquatic specialist is recommended and they can assist with the development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to micro-siting of the final layout. Where large cut and fill areas are required these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation. Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc). <p>To minimise the impact of the access roads:</p>

				<ul style="list-style-type: none"> • Use existing roads or upgrade existing tracks to cross wetlands rather than constructing entirely new roads wherever possible. • Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Any unnecessary intrusion into these areas is prohibited. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences. • Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils. • All pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert. • The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist during a pre-construction walkdown. • Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.
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				<ul style="list-style-type: none"> Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted. All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated. It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.
	Potential spread of alien vegetation	Negative Medium	Negative Low	<p>Mitigation measures to reduce residual risk or enhance opportunities:</p> <ul style="list-style-type: none"> Alien vegetation management must be initiated at the beginning of the construction period and must extend into any remaining areas into the operation phase on the facility The revegetation of any temporary sites as well as any previously degraded areas must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications Regeneration of alien vegetation must be monitored once all areas have been cleared, forming part of a long-term alien vegetation management plan
	Loss of riparian and or wetland habitat	Negative Medium	Negative Low	<p>Mitigation measures to reduce residual risk or enhance opportunities:</p> <ul style="list-style-type: none"> A pre-construction walkthrough with an aquatic specialist is recommended and they can assist with the development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to micro-siting of the final layout.

				<ul style="list-style-type: none"> • Where large cut and fill areas are required these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation. • Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc). <p>To minimise the impact of the access roads:</p> <ul style="list-style-type: none"> • Use existing roads or upgrade existing tracks to cross wetlands rather than constructing entirely new roads wherever possible. • Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Any unnecessary intrusion into these areas is prohibited. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences. • Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils. • All pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert. • The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from
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				<p>being formed. The related designs must be assessed by an aquatic specialist during a pre-construction walkdown.</p> <ul style="list-style-type: none"> • Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities. • Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted. • All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated. • It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.
	<p>Changes to the hydrological regime and increase potential for erosion</p>	<p>Negative Medium</p>	<p>Negative Low</p>	<p>Mitigation measures to reduce residual risk or enhance opportunities:</p> <ul style="list-style-type: none"> • The preferred option is recommended as all aquatic systems have been avoided • No stormwater discharged may be directed to delineated aquatic zones or the associated buffers.

				<ul style="list-style-type: none"> • A stormwater management plan must be developed post EA, detailing the structures and actions that must be installed to prevent the increase of surface water flows directly into any natural systems. • Effective stormwater management must include measures to slow, spread and deplete the energy of concentrated flows through effective stabilisation (gabions and Reno mattresses) and the re-vegetation of any disturbed areas <p>To minimise the impact of the access roads:</p> <ul style="list-style-type: none"> • Use existing roads or upgrade existing tracks to cross wetlands rather than constructing entirely new roads wherever possible. • Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Any unnecessary intrusion into these areas is prohibited. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences. • Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils. • All pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert. • The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist during a pre-construction walkdown.
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				<ul style="list-style-type: none"> • Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities. • Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted. • All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated. • It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.
	Changes to surface water quality characteristics	Negative Medium	Negative Low	<p>Mitigation measures to reduce residual risk or enhance opportunities:</p> <ul style="list-style-type: none"> • All liquid chemicals including fuels and oil, including for the BESS, must be stored in with secondary containment (bunds or containers or berms) that can contain a leak or spill. Such facilities must be inspected routinely and must have the suitable PPE and spill kits needed to contain likely worst-case scenario leak or spill in that facility, safely.

				<ul style="list-style-type: none"> • Washing and cleaning of equipment must be done in designated wash bays, where rinse water is contained in evaporation/sedimentation ponds (to capture oils, grease cement and sediment). • Mechanical plant and bowsers must not be refueled or serviced within 100m of a river channel or wetland. • All construction camps, lay down areas, wash bays, batching plants or areas and any stores should be more than 50 m from any demarcated water courses. • Littering and contamination associated with construction activity must be avoided through effective construction camp management. • No stockpiling should take place within or near a water course. • All stockpiles must be protected and located in flat areas where run-off will be minimised and sediment recoverable. • ESO monitors the site on a daily basis to ensure plant is in working order (minimise leaks), spills are prevented and if they do occur, are quickly rectified.
Visual Impact Assessment (Appendix E3)	Visual impact of construction activities on sensitive visual receptors in close proximity to the SEF	Negative Medium	Negative Low	<p>Planning:</p> <ul style="list-style-type: none"> • Retain and maintain natural vegetation immediately adjacent to the development footprint. <p>Construction:</p> <ul style="list-style-type: none"> • Ensure that vegetation is not unnecessarily removed during the construction phase. • Plan the placement of laydown areas and temporary construction equipment camps in order to minimise vegetation clearing (i.e., in already disturbed areas) where possible. • Restrict the activities and movement of construction workers and vehicles to the immediate construction site and existing access roads.

				<ul style="list-style-type: none"> • Ensure that rubble, litter, etc. are appropriately stored (if it can't be removed daily) and then disposed of regularly at a licenced waste site. • Reduce and control dust during construction by utilising dust suppression measures. • Limit construction activities between 07:00 and 18:00, where possible, in order to reduce the impacts of construction lighting. • Rehabilitate all disturbed areas immediately after the completion of construction work and maintain good housekeeping.
Social Impact Assessment (Appendix E7)	The creation of direct and indirect employment opportunities during the construction phase of the project	Low Positive	Medium Positive	<p>Enhancement:</p> <ul style="list-style-type: none"> • A local employment policy should be adopted to maximise opportunities made available to the local labour force. • Labour should be sourced from the local labour pool, and only if the necessary skills are unavailable should labour be sourced from (in order of preference) the greater Letsemeng LM, Xhariep DM, Free State Province, South Africa, or elsewhere. • Where feasible, training and skills development programmes should be initiated prior to the commencement of the construction phase. • As with the labour force, suppliers should also as far as possible be sourced locally. • As far as possible local contractors that are compliant with Broad-Based Black Economic Empowerment (B-BBEE) criteria should be used. • The recruitment selection process should seek to promote gender equality and the employment of women wherever possible.
	Significance of the impact from the economic multiplier effects from the	Low Positive	Medium Positive	<p>Enhancement:</p> <ul style="list-style-type: none"> • It is recommended that a local procurement policy is adopted to maximise the benefit to the local economy. • A database of local companies, specifically Historically Disadvantaged Individuals (HDIs) which qualify as potential service providers (e.g.,

	use of local goods and services.			<p>construction companies, security companies, catering companies, waste collection companies, transportation companies etc.) should be created and companies listed thereon should be invited to bid for project-related work where applicable.</p> <ul style="list-style-type: none"> Local procurement is encouraged along with engagement with local authorities and business organisations to investigate the possibility of procurement of construction materials, goods and products from local suppliers where feasible.
	Investment into upgrading and maintain shared infrastructure such as roads and stormwater infrastructure on farms may benefit farming operations	Low Positive	Low Positive	<p>Enhancement:</p> <ul style="list-style-type: none"> The project would contribute to an upgrade in the shared infrastructure of the LM as well as in the maintenance of this infrastructure. The LM would be encouraged to participate in this maintenance and upgrade where it would be feasible for them to be involved. A database of local companies, specifically Historically Disadvantaged Individuals (HDIs) which qualify as potential service providers (e.g., construction companies, security companies, catering companies, waste collection companies, transportation companies etc.) should be created (or sourced from the local Municipality, where available) and companies listed thereon should be invited to bid for project-related work where applicable and this would include the maintenance of this shared infrastructure.
	The potential loss in productive farmland during the construction phase, due to factors such as the construction of roads, the	Negative Medium	Negative Low	<ul style="list-style-type: none"> The proposed site for the Luckhoff Solar 3 SEF needs to be fenced off prior to the construction phase and all construction related activities should be confined in this fenced off area. Livestock grazing on the proposed site need to be relocated.

	preparation of foundations, power lines, offices etc			<ul style="list-style-type: none"> • All affected areas, which are disturbed during the construction phase, need to be rehabilitated prior to the operational phase and should be continuously monitored by the Environmental Control Officer (ECO). • Implement, manage and monitor a grievance mechanism for the recording and management of social issues and complaints.
	In-migration of labourers in search of employment opportunities, and a resultant change in population, and increase in pressure on local resources and social networks, or existing services and infrastructure	Negative Medium	Negative Low	<ul style="list-style-type: none"> • Develop and implement a local procurement policy which prioritises “locals first” to prevent the movement of people into the area in search of work. • Engage with local community representatives prior to construction to facilitate the adoption of the locals first procurement policy. • Provide transportation for workers (from Luckhoff and surrounds) to ensure workers can easily access their place of employment and do not need to move closer to the project site. • Working hours should be kept between daylight hours during the construction phase, and / or as any deviation that is approved by the relevant authorities. • Compile and implement a grievance mechanism. • Appoint a Community Liaison Officer (CLO) to assist with the procurement of local labour. • Prevent the recruitment of workers at the project site. • Implement, manage and monitor a grievance mechanism for the recording and management of social issues and complaints. • Establish clear rules and regulations for access to the proposed site. • Appoint a security company and implement appropriate security procedures to ensure that workers do not remain onsite after working hours. • Inform local community organisations and policing forums of construction times and the duration of the construction phase.

				<ul style="list-style-type: none"> Establish procedures for the control and removal of loiterers from the construction site.
	Temporary increase in safety and security concerns associated with the influx of people during the construction phase	Negative Medium	Negative Low	<ul style="list-style-type: none"> Working hours should be kept within daylight hours during the construction phase, and / or as any deviation that is approved by the relevant authorities. Provide transportation for workers to prevent loitering within or near the project site outside of working hours. The perimeter of the construction site should be appropriately secured to prevent any unauthorised access to the site. The fencing of the site should be maintained throughout the construction period. The appointed EPC Contractor must appoint a security company to ensure appropriate security procedures and measures are implemented. Access in and out of the construction site should be strictly controlled by a security company appointed to the project. A CLO should be appointed as a grievance mechanism. A method of communication should be implemented whereby procedures to lodge complaints are set out for the local community to express any complaints or grievances with the construction process. The EPC Contractor should implement a stakeholder management plan to address neighbouring farmer concerns regarding safety and security. The project proposed must prepare and implement a Fire Management Plan; this must be done in conjunction with surrounding landowners. The EPC Contractor must prepare a Method Statement which deals with fire prevention and management.
	Temporary increase in traffic disruptions and	Negative Medium	Negative Low	<ul style="list-style-type: none"> All vehicles must be road worthy, and drivers must be qualified, obey traffic rules, follow speed limits and be made aware of the potential road safety issues.

	<p>movement patterns during the construction phase.</p>			<ul style="list-style-type: none"> • Heavy vehicles should be inspected regularly to ensure their road worthiness. • Provision of adequate and strategically placed traffic warning signs, that have to be maintained for the duration of the construction phase, and control measures along the S572 and R48 regional road to warn road users of the construction activities taking place for the duration of the construction phase. Warning signs must be always visible, especially at night. • Implement penalties for reckless driving to enforce compliance to traffic rules. • Avoid heavy vehicle activity during “peak” hours (when children are taken to school, or people are driving to work). • The developer and EPC Contractor must ensure that all fencing along access roads is maintained in the present condition or repaired if disturbed due to construction activities. • The developer and EPC Contractor must ensure that the roads utilised for construction activities are either maintained in the present condition or upgraded if disturbed due to construction activities. • The EPC Contractor must ensure that damage / wear and tear caused by construction related traffic to the access roads is repaired before the completion of the construction phase. • A method of communication must be implemented whereby procedures to lodge complaints are set out for the local community to express any complaints or grievances with the construction process.
	<p>Nuisance impacts in terms of temporary increase in noise and dust, and wear</p>	<p>Negative Medium</p>	<p>Negative Low</p>	<ul style="list-style-type: none"> • The movement of heavy vehicles associated with the construction phase should be timed to avoid weekends, public holidays, and holiday periods where feasible.

	and tear on access roads to the site			<ul style="list-style-type: none"> • Dust suppression measures must be implemented for heavy vehicles such as wetting of gravel roads on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers. • Ensure all vehicles are road worthy, drivers are qualified and are made aware of the potential noise and dust issues. • A CLO should be appointed, and a grievance mechanism implemented.
	The potential loss of livestock, crops, and farmsteads in the area. This also includes the damage and loss of farm infrastructure and the threatening of human lives that are associated with the increased risk of veld fires	Negative Medium	Negative Low	<ul style="list-style-type: none"> • A firebreak should be implemented before the construction phase. The firebreak should be controlled and implemented around the perimeters of the project site. • Adequate fire-fighting equipment should be provided and readily available on site and all staff should be trained in firefighting and how to use the fire-fighting equipment. • No staff (except security) should be accommodated overnight on site and the contractor should ensure that no open fires are allowed on site. The use of cooking or heating implements should only be used in designated areas. • Contractors need to ensure that any construction related activities that might pose potential fire risks, are done in the designated areas where it is also managed properly. • Precautionary measures need to be taken during high wind conditions or during the winter months when the fields are dry. • The contractor should enter an agreement with the local farmers before the construction phase that any damages or losses during the construction phase related to the risk of fire and that are created by staff during the construction phase, are borne by the contractor.
	Intrusion impacts from construction activities will	Negative Low	Negative Low	<ul style="list-style-type: none"> • Implement mitigation measures identified in the Visual Impact Assessment (VIA) prepared for the project.

	have an impact on the area's "sense of place".			<ul style="list-style-type: none"> • Limit noise generating activities to normal daylight working hours and avoid weekends and public holidays. • The movement of heavy vehicles associated with the construction phase should be timed to avoid weekends, public holidays, and holiday periods where feasible. • Dust suppression measures must be implemented for heavy vehicles such as wetting of gravel roads 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. • Communication, complaints, and grievance channels must be implemented and contact details of the CLO must be provided to the local community in the study area.
Traffic Impact Assessment (Appendix E8)	<p>Increase in development trips for the duration of the construction Phase</p> <p>Associated noise, dust and exhaust pollution</p>	Negative Medium	Negative Low	<ul style="list-style-type: none"> • Stagger component delivery to site. • Reduce the construction period. • Stagger the construction Phase. • The use of mobile batch plants and quarries in close proximity to the site would decrease the impact on the surrounding road network • Staff and general trips should occur outside of peak traffic periods as much as possible. • Maintenance of haulage routes. • Design and maintenance of internal roads. • Provide two access points to the site to split construction vehicle trips.

6.2.2 Impacts during the operational phase

During the operational phase the site will serve as a solar plant. The potential impacts will take place over a period of 20 – 25 years. During the operational phase the following activities will have various potential impacts on the biophysical and socio-economic environment:

- Activity 11(i) (GN.R. 327): *“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.”*
- Activity 1 (GN.R 325): *“The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more.”*
- Activity 10 (b)(i)(ee)(gg)(hh) (GN.R 324): *“The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (b) in the Free State, (i) outside urban areas,(ee) critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans (gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve and (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland.”*

During the operational phase minor negative impacts are foreseen over the long term. The latter refers to at least a 20-year period. Table 6.4 summarizes the potentially most significant impacts and the mitigation measures that are proposed during the operational phase.

Table 6.4: Impacts and the mitigation measures during the operational phase

SPECIALIST STUDY	IMPACT	PRE-MITIGATION RATING	POST MITIGATION RATING	SUMMARY OF MITIGATION MEASURES
Ecological Impact Assessment (Appendix E1)	<p>Infestation of Alien Plant Species</p> <p>If laydown areas and roads are not rehabilitated, these disturbed areas can become places for alien invasive species to become established, and if left unmitigated, these species can spread and establish themselves in intact vegetation, resulting in the displacement of indigenous species and possible local extinctions of SCC.</p> <p>Three exotic species (<i>Schinus molle</i>, <i>Argemone ochroleuca</i> and <i>Cymbopogon pospischilii</i>) were recorded within the project site. <i>Argemone</i></p>	Negative Low	Negative Low	<ul style="list-style-type: none"> • The site must be checked regularly for the presence of alien invasive species. When alien invasive species are found, immediate action must be taken to remove them. • <i>Argemone ochroleuca</i> currently noted on site must be removed and disposed of. • An alien invasive management plan must be incorporated into the EMPr. • The ECO must create a list with accompanying photographs of possible alien invasive species that could occur on site prior to construction. This photo guide must be used to determine if any alien invasive species are present.

	<i>ochroleuca</i> is listed as a Category 1b species.			
	Disturbance to terrestrial vertebrate faunal species Operation activities may generate disturbance to faunal species disrupting foraging and/or breeding behaviour.	Negative Low	Negative Low	<ul style="list-style-type: none"> • Maintenance must be restricted to daylight hours • Vehicles must meet best practice standards in terms of noise • Dust suppression techniques such as road watering required during windy periods
	Mortality of faunal species Operation activities may kill terrestrial vertebrate fauna specifically driving across the site. Fauna perceived as dangerous may be persecuted out of fear.	Negative Medium	Negative Low	<ul style="list-style-type: none"> • Speed restrictions within the development for all vehicles (30km/h is recommended) should be in place to reduce the impact of killed fauna on the project roads. • Mortality of terrestrial vertebrate species on roads must be monitored and reported (carcasses need to be collected and frozen and circumstances of roadkill investigated). • Only cleaning chemicals least harmful to faunal species should be used during landscaping. Runoff can cause chemical to enter aquatic systems and may impact on faunal species that inhabit them.
Avifauna Impact Assessment (Appendix E2)	Displacement of priority avian species from important habitats	Negative Medium	Negative Low	<ul style="list-style-type: none"> • Avoid and buffer habitat with high preliminary avian sensitivities.
	Displacement of resident avifauna through increased disturbance	Negative Medium	Negative Low	<ul style="list-style-type: none"> • Avoid and buffer habitat with high preliminary avian sensitivities.

Collisions with PV panels leading to injury or loss of avian life	Negative Medium	Negative Medium	<ul style="list-style-type: none"> • Apply bird deterrent devices such as rotating flashers/reflectors to the panels for birds that may mistake the panels for open water and to prevent them from landing on the panels - these should especially be placed at panels nearest to pans and watering points. Security/CCTV cameras may be installed to quantify mortalities (cameras are also installed along the perimeter fence for security measures and may also prove effective to quantify mortalities). • Buffer ephemeral drainage systems (by at least 500m – buffer width will be re-evaluated pending the results obtained during the EIA/baseline surveys). • Implement additional pre-construction monitoring to evaluate important bird flyways/dispersal routes. • Implement post-construction monitoring. If post-construction monitoring predicts and/or confirms any bird mortalities, an option is to employ video cameras at selected areas to document bird mortalities and to conduct direct observations and carcass searches on a regular and systematic basis.
Displacement of priority avian species from important habitats (Power Line)	Negative Medium	Negative Low	<ul style="list-style-type: none"> • Avoid and buffer habitat with high preliminary avian sensitivities.
Displacement of resident avifauna through increased disturbance (Power Line)	Negative Medium	Negative Low	<ul style="list-style-type: none"> • Avoid and buffer habitat with high preliminary avian sensitivities.
Collision when flying into power line infrastructure	Negative High	Negative Medium	<ul style="list-style-type: none"> • Apply bird deterrent devices to the power lines and make use of "bird-friendly" pylon structures.

				<ul style="list-style-type: none"> • Avoid the placement of any watering points in close proximity to any overhead electrical infrastructure. • To aid post-construction monitoring and/or monitoring of bird mortality rates, it is advised to conduct direct observations and carcass searches on a regular and systematic basis. • Collisions will be reduced if the grid corridor is placed alongside existing powerlines.
	Electrocution when perched on power line infrastructure	Negative Medium	Negative Low	<ul style="list-style-type: none"> • Avoid the placement of watering points in close proximity to any overhead electrical infrastructure. • Make use of bird-friendly pylons and bird guards as recommended by EWT.
Aquatic Ecological Assessment (Appendix E1)	Potential spread of alien vegetation	Negative Medium	Negative Low	<ul style="list-style-type: none"> • Refer to Construction Phase mitigation (Table 6.3)
Visual Impact Assessment (Appendix E3)	Visual impact on sensitive visual receptors within a 1km radius from the SEF	Negative Medium	Negative Low	<p>Planning:</p> <ul style="list-style-type: none"> • Retain/re-establish and maintain natural vegetation immediately adjacent to the development footprint. • Where insufficient natural vegetation exists next to the property, a 'screen' can be planted if the landowner requests additional mitigation. This can be done using endemic, fast growers that are water efficient. <p>Operations:</p> <ul style="list-style-type: none"> • Maintain general appearance of the facility as a whole.
	Visual impact on sensitive visual receptors between a 1km and 3km radius from the SEF	Negative Medium	Negative Low	
	Visual impact on sensitive visual receptors within a 3-5km radius from the SEF	Negative Low	Negative Low	

	Visual impact on sensitive visual receptors within a 5-10km radius from the SEF	Negative Low	Negative Low	
	Visual impacts of lighting at night on sensitive visual receptors in close proximity to the proposed facility	Negative Medium	Negative Low	<p>Planning & Operation</p> <p>As far as practically possible:</p> <ul style="list-style-type: none"> • Shield the source of light by physical barriers (walls, vegetation etc.) • Limit mounting heights of lighting fixtures, or alternatively use footlights or bollard level lights. • Make use of minimum lumen or wattage in fixtures. • Make use of down-lighters, or shield fixtures. • Make use of low-pressure sodium lighting or other types of low impact lighting. • Make use of motion detectors on security lighting. This will allow the site to remain in relative darkness, until lighting is required for security or maintenance purposes. • The use of night vision or thermal security cameras are very effective and can replace security lighting entirely.
	Visual impacts of glint and glare as a visual distraction and possible air travel hazard	Negative Low	Negative Low	<ul style="list-style-type: none"> • No mitigation measures are required.
	Visual impacts on sense of place associated with the operational phase of the SEF	Negative Medium	Negative Low	<ul style="list-style-type: none"> • It is believed that renewable energy resources are essential to the environmental well-being of the country and planet (WESSA, 2012). Aesthetic issues are subjective, and some people find solar farms and their associated infrastructure pleasant and optimistic while others may find it visually

				<p>invasive; it is mostly perceived as symbols of energy independence; and local prosperity.</p> <ul style="list-style-type: none"> The subjectivity towards the project in its entirety can be influenced by creating a “Green Energy” awareness campaign, educating the local community and potentially tourists on the benefits of renewable energy. This can be achieved by also hosting an ‘open day’ where the local community can have the opportunity to view the completed project which may enlist a sense of pride in the renewable energy project in their area. Implement good housekeeping measures.
Social Impact Assessment (Appendix E7)	The creation of employment opportunities and skills development opportunities during the operation phase for the country and local economy	Positive Low	Positive Medium	<p>Enhancement:</p> <ul style="list-style-type: none"> It is recommended that local employment policy is adopted to maximise the opportunities made available to the local community. The recruitment selection process should seek to promote gender equality and the employment of women wherever possible. Vocational training programs should be established to promote the development of skills.
	Development of non-polluting, renewable energy infrastructure	Positive Medium	Positive Medium	<ul style="list-style-type: none"> N/A
	Loss of agricultural land and overall productivity as a result of the operation of	Negative Medium	Negative Low	<ul style="list-style-type: none"> The proposed mitigation measures for the construction phase should have been implemented at this stage. Mitigation measures from the Agricultural and Soil Report, should also be implemented.

	the proposed project on an agricultural property			
	Contribution to LED and social upliftment during the operation of the project	Positive Medium	Positive High	<p>Enhancement:</p> <ul style="list-style-type: none"> • A CNA must be conducted to ensure that the LED and social upliftment programmes proposed by the project are meaningful. • Ongoing communication and reporting are required to ensure that maximum benefit is obtained from the programmes identified, and to prevent the possibility for such programmes to be misused. • The programmes should be reviewed on an ongoing basis to ensure that they are best suited to the needs of the community at the time (bearing in mind that these are likely to change over time).
	The potential impact on tourism due to the establishment of the Luckhoff Solar 3 SEF	Positive/Negative Low	Positive/Negative Low	<ul style="list-style-type: none"> • Due to the extent of the project no viable mitigation measures can be implemented to eliminate the visual impact of the PV panels, but the subjectivity towards the PV panels can be influenced by creating a “Green Energy” awareness campaign, educating the local community and tourists on the benefits of renewable energy. Tourists visiting the area should be made aware of South Africa’s movement towards renewable energy. This might create a positive feeling of a country moving forward in terms of environmental sustainability. This could be implemented by constructing a visitor’s centre on the property allocated to the proposed solar farm which should be opened to school fieldtrips, the local community, and tourists

	Visual impacts and sense of place impacts associated with the operation phase of Luckhoff Solar 3 SEF	Negative Low	Negative Low	<ul style="list-style-type: none"> To effectively mitigate the visual impact and the impact on sense of place during the operational phase of the proposed Luckhoff Solar 3 SEF, it is suggested that the recommendations made in the Visual Impact Assessment (specialist study) should be followed in this regard.
	The creation of employment opportunities and skills development opportunities during the operation phase for the households involved in the project would create an opportunity for an increase in household earnings	Positive Low	Positive Medium	<p>Enhancement:</p> <ul style="list-style-type: none"> It is recommended that local employment policy is adopted to maximise the opportunities made available to the local community. With the recruitment of the local community for job creation and increase in household earnings will automatically be seen in the area surrounding the development.
Traffic Impact Assessment (Appendix E8)	<p>Slight increase in trips due to permanent staff on site.</p> <p>Increase in trips around twice a year for transport of water to site for the cleaning of solar panels (water source to be clarified – borehole or transported to site/size of water tankers if water is to be delivered on site)</p>	Negative Low	Negative Low	<ul style="list-style-type: none"> Source on-site water supply if possible. Utilise cleaning systems for the panels needing less vehicle trips. Schedule trips for the provision of water for the cleaning of panels outside peak traffic times as much as possible.

6.2.3 Impacts during the decommissioning phase

The physical environment will benefit from the closure of the solar facility since the site will be restored to its natural state. Table 6.5 provides a summary of the impacts during the decommissioning phase. The decommissioning phase will however potentially result in impact on soils, pressure on existing service infrastructure, surface water and the loss of permanent employment. Skilled staff will be eminently employable, and a number of temporary jobs will also be created in the process. Decommissioning of a PV facility will leave a positive impact on the habitat and biodiversity in the area as the area will be rehabilitated to its natural state.

Table 6.5: Impacts and the mitigation measures during the decommissioning phase

SPECIALIST STUDY	IMPACT	PRE-MITIGATION RATING	POST MITIGATION RATING	SUMMARY OF MITIGATION MEASURES
Ecological Impact Assessment (Appendix E1)	Loss of Indigenous Vegetation The decommissioning of the Photovoltaic Solar Facility will require laydown areas and will disrupt vegetation that has re-established around the areas that were disturbed during the construction phase. The loss of vegetation will be similar to the construction phase impacts.	Negative Low	Negative Low	<ul style="list-style-type: none"> Refer to mitigation measures listed under Table 6.3
	Disturbance to terrestrial vertebrate faunal species Decommissioning activities may generate	Negative Low	Negative Low	<ul style="list-style-type: none"> Refer to mitigation measures listed under construction and operational impact (Table 6.3 and 6.4)

	disturbance to faunal species disrupting foraging and/or breeding behaviour			
	<p>Mortality of faunal species</p> <p>Decommissioning activities may kill terrestrial vertebrate fauna specifically driving across the site. Fauna perceived as dangerous may be persecuted out of fear.</p>	Negative Medium	Negative Low	<ul style="list-style-type: none"> Refer to mitigation measures listed under construction and operational impact (Table 6.3 and 6.4)
Avifauna Impact Assessment (Appendix E2)	Displacement of priority avian species from important habitats	Negative Low	Negative Low	<ul style="list-style-type: none"> Avoid the temporary storage (laydown) of removed infrastructure on habitat with a high avian sensitivity. Rehabilitation should make use of indigenous floristic species that are native to the study area.
	Displacement of resident avifauna through increased disturbance	Negative Low	Negative Low	<ul style="list-style-type: none"> Avoid the temporary storage (laydown) of removed infrastructure on habitat with a high avian sensitivity. Rehabilitation should make use of indigenous floristic species that are native to the study area.
	Loss of habitat containing protected	Negative Medium	Negative Low	<ul style="list-style-type: none"> Refer to construction mitigation measures (Table 6.3)

Aquatic Ecological Assessment (Appendix E1)	species or Species of Special Concern			
	Loss of CBAs or potential areas with conservation potential	Negative Medium	Negative Low	<ul style="list-style-type: none"> Refer to construction mitigation measures (Table 6.3)
	Loss of riparian and or wetland habitat	Negative Medium	Negative Low	<ul style="list-style-type: none"> Refer to construction mitigation measures (Table 6.3)
	Changes to the hydrological regime and increase potential for erosion	Negative Medium	Negative Low	<ul style="list-style-type: none"> Refer to construction mitigation measures (Table 6.3)
	Changes to surface water quality characteristics	Negative Medium	Negative Low	<ul style="list-style-type: none"> Refer to construction mitigation measures (Table 6.3)
Social Impact Assessment (Appendix E7)	Loss of employment opportunities	Negative Low	Negative Low	<ul style="list-style-type: none"> It is not expected that the facility will be decommissioned.
Traffic Impact Assessment (Appendix E8)	Increase in development trips for the duration of the construction Phase Associated noise, dust and exhaust pollution	Negative Medium	Negative Low	<ul style="list-style-type: none"> Refer to construction mitigation measures (Table 6.3)

7 CUMULATIVE EFFECTS ASSESSMENT

This section aims to address the requirements of Section 2 of the NEMA to consider cumulative impacts as part of any environmental assessment process.

7.1 Introduction

The EIA Regulations (2017) determine that cumulative impacts, *“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.”* Cumulative impacts can be incremental, interactive, sequential or synergistic. EIAs have traditionally failed to come to terms with such impacts, largely as a result of the following considerations:

- Cumulative effects may be local, regional or global in scale and dealing with such impacts requires coordinated institutional arrangements;
- Complexity - dependent on numerous fluctuating influencing factors which may be completely independent of the controllable actions of the proponent or communities; and
- Project level investigations are ill-equipped to deal with broader biophysical, social and economic considerations.

Despite these challenges, cumulative impacts have been afforded increased attention in this Scoping Report and for each impact a separate section has been added which discusses any cumulative issues, and where applicable, draws attention to other issues that may contextualise or add value to the interpretation of the impact – refer to Appendix E. This chapter analyses the proposed project’s potential cumulative impacts in more detail by: (1) defining the geographic area considered for the cumulative effects analysis; (2) providing an overview of relevant past and present actions in the project vicinity that may affect cumulative impacts; (3) presenting the reasonably foreseeable actions in the geographic area of consideration; and (4) determining whether there are adverse cumulative effects associated with the resource areas analysed.

The term "Cumulative Effect" has for the purpose of this report been defined as: the summation of effects over time which can be attributed to the operation of the project itself, and the overall effects on the ecosystem of the project area that can be attributed to the project and other existing and planned future projects.

7.2 Geographic Area of Evaluation

The geographic area of evaluation is the spatial boundary in which the cumulative effects analysis was undertaken. The spatial boundary evaluated in this cumulative effects analysis generally includes an area of a 30km radius surrounding the proposed development – refer to Figure 7.1 below.

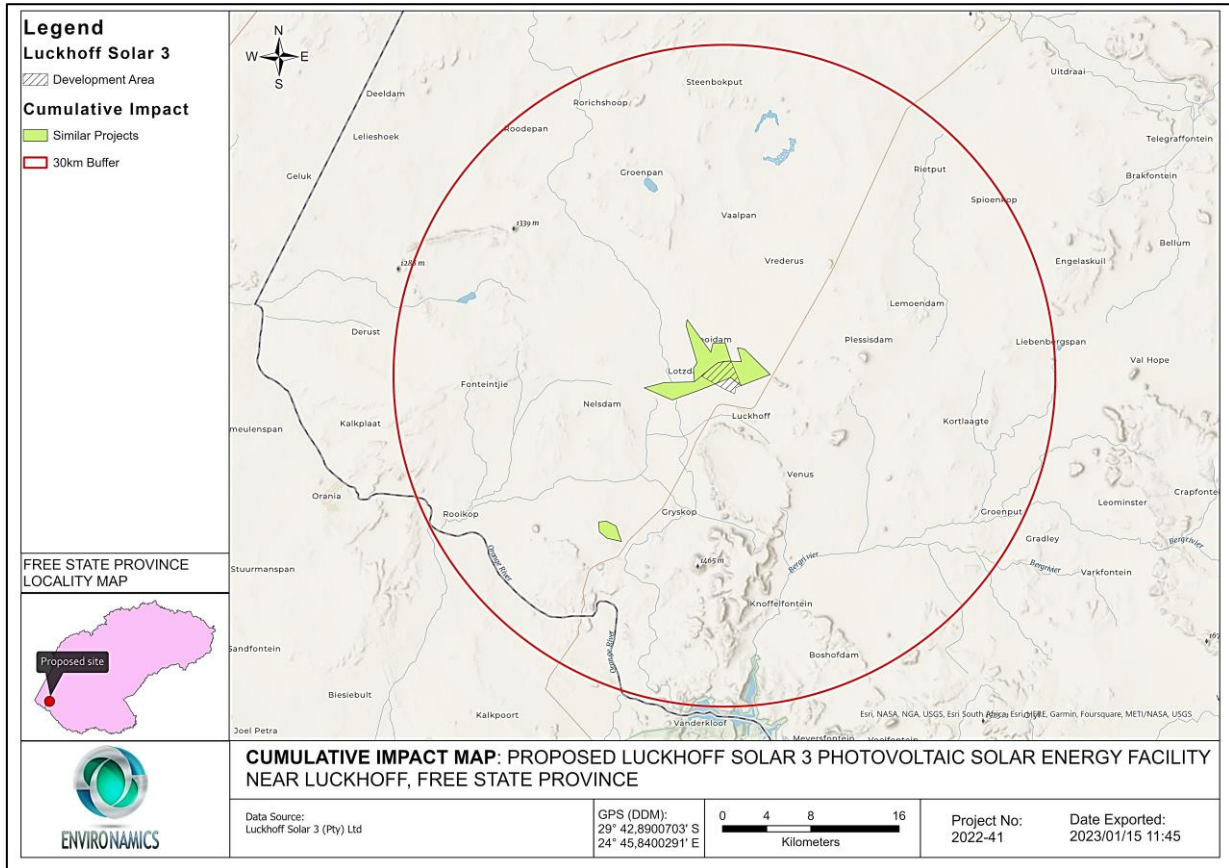


Figure 7.1: Geographic area of evaluation with utility-scale renewable energy generation sites and power lines

The geographic spread of PV solar projects, administrative boundaries and any environmental features (the nature of the landscape) were considered when determining the geographic area of investigation. It was argued that a radius of 30km would generally confine the potential for cumulative effects within this particular environmental landscape. The geographic area includes projects located within the Free State Provinces. A larger geographic area may be used to analyse cumulative impacts based on the specific temporal or spatial impacts of a resource. For example, the socio-economic cumulative analysis may include a larger area, as the construction workforce may draw from a much wider area. The geographic area of analysis is specified in the discussion of the cumulative impacts for that resource where it differs from the general area of evaluation described above.

7.3 Temporal Boundary of Evaluation

A temporal boundary is the timeframe during which the cumulative effects are reasonably expected to occur. The temporal parameters for this cumulative effects analysis are the anticipated lifespan of the proposed project, beginning in 2023 and extending out at least 20 years, which is the minimum expected project life of the proposed project. Where appropriate, particular focus is on near-term cumulative impacts of overlapping construction schedules for proposed projects in the area of evaluation.

7.4 OTHER PROJECTS IN THE AREA

7.4.1 Existing projects in the area

According to the DFFE's database, 10 solar PV plant applications have been submitted to the Department within the geographic area of investigation - refer to Table 7.1.

Table 7.1: A summary of related projects that may have a cumulative impact, in a 30 km radius of the study area

Site name	Distance from study area	Proposed generating capacity	DFFE reference	EIA process	Project status
Luckhoff Solar 1	0km	240MW	To be confirmed	S&EIA	In Process
Luckhoff Solar 2	0km	240MW	To be confirmed	S&EIA	In Process
Grootpoort PV	16km	100MW	14/12/16/3/3/2/835	S&EIA	Approved

It is unclear whether other projects not related to renewable energy is or has been constructed in this area, and whether other projects are proposed. In general, development activity in the area is focused on agriculture and mining. It is quite possible that future solar farm development may take place within the general area.

7.5 SPECIALIST INFORMATION ON CUMULATIVE EFFECTS

In line with the Terms of Reference (ToR) provided as part of the scoping report, specialists were asked to, where possible, take into consideration the cumulative effects associated with the proposed development and other projects which are either developed or in the process of being developed in the local area – refer to Figure 7.2 for process flow. The following sections present their findings. The following sections present their findings.

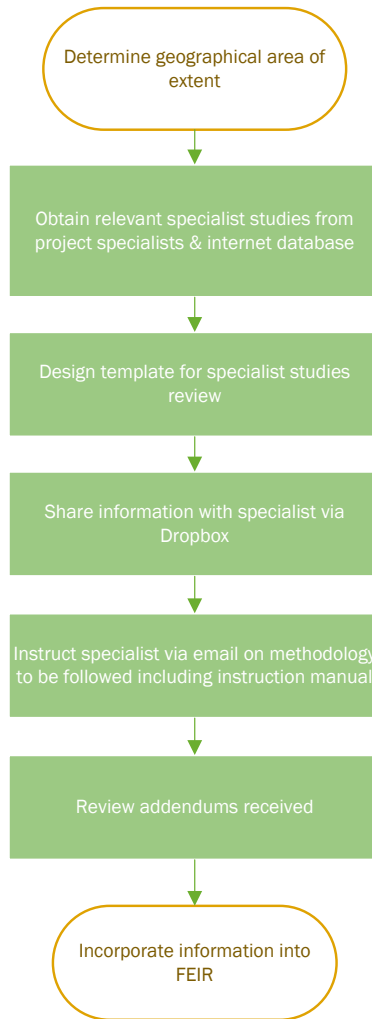


Figure 7.2: Process flow diagram for determining cumulative effects

7.5.1 Soil, Land Capability and Agricultural Potential

According to the Agriculture Compliance Statement (Appendix E4), the cumulative impacts will be assessed during the EIA phase of the project.

7.5.2 Social Impact Assessment

According to the Social Impact Assessment (refer to Appendix E7), Luckhoff Solar 3 SEF and the establishment of three other SEFs within the area has the potential to result in significant positive cumulative impacts, specifically with regards to the creation of a number of socio-economic opportunities for the region, which in turn, can result in positive social benefits. The positive cumulative impacts include creation of employment, skills development and training opportunities, and downstream business opportunities. The cumulative benefits to the local, regional, and national economy through employment and procurement of services are more considerable than that of Luckhoff Solar 3 SEF alone.

While the development of a single solar power project may not result in a major influx of people into an area, the development of three other projects may have a cumulative impact on the in-migration and movement of people. In addition, the fact that the project is proposed within an area characterised by good levels of solar irradiation suitable for the development of commercial solar energy facilities implies that the surrounding area is likely to be subject to considerable future applications for PV energy facilities. Levels of unemployment, and the low level of earning potential may attract individuals to the area in search of better employment opportunities and higher standards of living.

It is exceedingly difficult to control an influx of people into an area, especially in a country where unemployment rates are high. It is therefore important that the project proponent implement and maintain strict adherence with a local employment policy in order to reduce the potential of such an impact occurring.

7.5.3 Visual

According to the Visual Impact Assessment (refer to Appendix E3), the cumulative impact might be a negative medium impact due to the fact that the landscape is visually pleasant reflecting a farming landscape and some ridges to the east and south. The potential for cumulative impacts to occur as a result of the projects is therefore likely. On the other hand, the location of the SEFs within the study area will contribute to the consolidation of SEF structures to this locality and avoid a potentially scattered proliferation of solar energy infrastructure throughout the region.

Due to the extent of the project, no viable mitigation measures can be implemented to eliminate the visual impact of the PV facility entirely, but the possible visual impacts can be reduced. Several mitigation measures have however been proposed regardless of whether mitigation measures will reduce the significance of the of the anticipated impacts, they are considered good practice and should be implemented and maintained throughout the construction, operational and decommissioning phases of the project, if possible.

In terms of possible landscape degradation, the landscape does not appear to have any specific protection and is characterised by farming development. No buffer areas or areas to be avoided are applicable for this development.

7.5.4 Heritage

The Heritage Impact Assessment (Refer to Appendix E5), states that from a review of available databases, publications, as well as available heritage impact assessments done for the purpose of developments in the region, it was determined that the Luckhoff 3 PV project is located in an area with a very low presence of heritage sites and features.

Most of the archaeological remains recorded in the larger region of the project area consist of a background scatter of weathered and patinated, typologically mixed Middle Stone Age (MSA) artefacts, with a few isolated samples dating to the Fauresmith period. These artefacts occur dispersed within the surface gravels, rather than as discrete concentrations. The fact that there appears to be no stratigraphic context and no organic remains are preserved would

suggest that most of the proposed Luckhoff 3 development area is of low archaeological heritage sensitivity.

Heritage resources are sparsely distributed on the wider landscape with highly significant (Grade 1) sites being rare. Because of the low likelihood of finding further significant heritage resources in the area of the proposed development and the generally low density of sites in the wider landscape the overall impacts to heritage are expected to be of generally low significance before mitigation.

For the project area, the impacts to heritage sites are expected to be of low significance. This can be further ameliorated by implementing mitigation measures, include isolating sites, relocating sites (e.g., burials) and excavating or sampling any significant archaeological material found to occur within the project area during the project development phases. The chances of such material being found, however, are negligible. After mitigation, the overall impact significance would stay low.

7.5.5 Paleontology

According to the Palaeontological Impact Assessment (refer to Appendix E6), the geographic spread of PV solar projects, administrative boundaries and any environmental features (the nature of the landscape) were considered when determining the geographic area of investigation. It was argued that a radius of 30km would generally confine the potential for cumulative effects within this particular environmental landscape. The geographic area includes projects located within the Free State Province specific temporal or spatial impacts of a resource. For example, the socioeconomic cumulative analysis may include a larger area, as the construction workforce may draw from a much wider area. The geographic area of analysis is specified in the discussion of the cumulative impacts for that resource where it differs from the general area of evaluation described above.

A temporal boundary is the timeframe during which the cumulative effects are reasonably expected to occur. The temporal parameters for these cumulative effects analysis is the anticipated lifespan of the Proposed Project, beginning in 2024 and extending out at least 20 years, which is the minimum expected project life of the proposed project. Where appropriate, particular focus is on near-term cumulative impacts of overlapping construction schedules for proposed projects in the area of evaluation.

The general Palaeontological Sensitivity of the area is Low to High. However, it is important to note that the quality of preservation of these different sites will most probably vary and it is thus difficult to allocate a Cumulative Sensitivity to the projects. If all the mitigation measures are carried out, a conservative estimate of the Cumulative impacts on fossil Heritage will vary between Low and Medium.

7.5.6 Traffic

According to the Traffic Impact Assessment (refer to Appendix E8), this is a precautionary approach as in reality, these projects would be subject to a highly competitive bidding process and not all the projects may be selected to enter into a Power Purchase Agreement. Even if all the facilities are constructed and/or decommissioned at the same time, the roads authority will consider all applications for abnormal loads and work with all project companies to ensure

that loads on the public roads are staggered and staged to ensure that the impact will be acceptable.

The construction and decommissioning phases of a renewable energy project are the only significant traffic generators. The duration of these phases is short term, i.e., the potential impact of the traffic generated during the construction and decommissioning phases on the surrounding road network is temporary and solar projects, when operational, do not add any significant traffic to the road network.

As indicated in Table 7.1 above, Luckhoff Solar 1 and 2 form part of the Luckhoff Solar PV Cluster and are investigated in separate reports.

For the purpose of this study, it is assumed that Luckhoff Solar 1 and 2 will generate similar construction trips, as they are of similar size (240 MW each, approximately ~240 daily construction trips) and that Grootpoort PV will generate around 110 daily construction trips (100MW development). However, as Grootpoort PV is already approved, it can be expected that construction will take place before the Luckhoff Solar project.

It is further noted that it is unlikely that all above developments will be constructed at the same time. However, for the event that the developments have similar construction periods, it is recommended to agree on a delivery schedule between the projects to reduce development trips and consequently the impact on the external road network.

7.6 IMPACT ASSESSMENT

Following the definitions of the term, the “residual effects on the environment”, i.e., effects after mitigation measures have been put in place, combined with the environmental effects of past, present and future projects and activities will be considered in this assessment. Also, a “combination of different individual environmental effects of the project acting on the same environmental component” can result in cumulative effects.

7.6.1 Potential Cumulative Effects

The receptors (hereafter referred to as Valued Ecosystem Components (VECs) presented in Section 6 (refer to the matrix analysis) have been examined alongside other past, present and future projects for potential adverse cumulative effects. A summary of the cumulative effects discussed are summarized in Table 7.2. There have been specific VECs identified with reference to the Solar Project (Table 6.2), which relates to the biophysical and socio-economic environments. Table 7.2 indicates the potential cumulative effects VECs and the rationale for inclusion/exclusion.

Table 7.2: Potential Cumulative Effects for the proposed project

	Valued Ecosystem Components (VECs)	Rationale for Inclusion / Exclusion	Level of Cumulative Effect
Construction Phase			
Aquatic Ecology Impact Assessment	Impacts on the aquatic resources of the area	The cumulative impact assessment considers the combined impact of the remaining and other renewable projects within a 30km radius, that are also in the development phase and the associated grid lines on the aquatic resources. The rating below is based on the premise that important or sensitive features will be avoided by the various projects, while the mitigations proposed will ensure that the form and or function of downstream areas remain intact	- Low
Social Impact Assessment	An increase in employment opportunities, skills development and business opportunities with the establishment of more than one solar power facility	The establishment of several SEFs under the REIPPP Programme in the area has the potential to have a positive cumulative impact on the area in the form of employment opportunities, skills development and business opportunities. The positive benefits will be enhanced if local employment policies are adopted, and local services providers are utilised by the developers to maximise the project opportunities available to the local community.	+ Medium
	Impact with large-scale in-migration of people	While the development of a single solar power project may not result in a major influx of people into an area, the development of three other projects may have a cumulative impact on the in-migration and movement of people. In addition, the fact that the project is proposed within an area characterised by good levels of solar irradiation suitable for the development of commercial solar energy facilities implies that the surrounding area is likely to be subject to considerable future applications for PV energy facilities. Levels of unemployment, and the low level of earning potential may attract individuals to the area in search of better employment opportunities and higher standards of living. It is exceedingly difficult to control an influx of people into an area, especially in a country where unemployment rates are high. It is therefore important that the project proponent implement and maintain strict adherence with a local employment policy in order to reduce the potential of such an impact occurring.	- Medium

Traffic Impact Study	Further increase of development trips during construction phase if the developments listed in Table 7.1 will be constructed at the same time as the proposed Luckhoff Solar 3 PV Facility	It is noted that it is unlikely that all developments will be constructed at the same time. However, for the event that the developments have similar construction periods, it is recommended to agree on a delivery schedule between the respective projects.	- Medium
Operational Phase			
Visual Impact Assessment	Visual intrusion of the development on observers within the area	The anticipated cumulative visual impact for the SEF is expected to include the change in sense of place, as well as the precedent being set for SEFs in the area where currently there is only a precedent for agricultural related activities. Further construction and operation of the SEF in the area is likely to have a negative impact.	- Medium
Decommissioning Phase			
General	Generation of waste	During the decommissioning of the facility waste will be generated that will need to be disposed of where recycling and re-use is not available. This may lead to pressure on waste disposal facilities in the area.	- Medium

7.7 CONCLUSION

This chapter of the Scoping Report addressed the cumulative environmental effects of the construction, operation and decommissioning project phases to be further assessed as part of the EIA Phase. The information to date has shown that no significant adverse residual impacts are likely. However, cumulative impacts could arise as other similar projects are constructed in the area.

The potential most significant cumulative impacts relate to:

- Cumulative effects during construction phase:
 - Impacts on the aquatic resources of the area (- Low)
 - Impacts of employment opportunities, business opportunities and skills development (+ Medium)
 - Impact with large-scale in-migration of people (- Medium)

- Further increase of development trips during construction phase if the developments (-Medium)
- Cumulative effects during the operational phase:
 - Visual intrusion (- Medium)
- Cumulative effects during the decommissioning phase:
 - Generation of waste (- Medium)

The cumulative impact for the proposed development is medium to low and no high, unacceptable impacts related to the project are expected. Considering the extent of the project and information presented in section 7 of this report, it can be concluded that the cumulative impacts will not result in large scale changes and impacts on the environment.

Photovoltaic solar energy technology is a clean technology which contributes toward a better-quality environment. The proposed project will contribute to local economic growth by supporting industry development in line with provincial and regional goals and ensuring advanced skills are drawn to the Free State Province. No cumulative impacts with a high residual risk have been identified.

In terms of the desirability of the development of sources of renewable energy therefore, it may be preferable to incur a higher cumulative loss in such a region as this one (where the landscape has already experienced degradation), than to lose land with a higher environmental value elsewhere in the country.

8 PLAN OF STUDY FOR EIA

This section aims to address the following requirements of the regulations:

Appendix 2. (2) A scoping report (...) must include -

- (i) a plan of study for undertaking the EIA process to be undertaken, including-
 - (i) a description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity;
 - (ii) a description of the aspects to be assessed as part of the EIA process;
 - (iii) aspects to be assessed by specialists;
 - (iv) a description of the proposed method of assessing the environmental aspects, including a description of the proposed method of assessing the environmental aspects including aspects to be assessed by specialists;
 - (v) a description of the proposed method of assessing duration and significance;
 - (vi) an indication of the stages at which the competent authority will be consulted;
 - (vii) particulars of the public participation process that will be conducted during the EIA process; and
 - (viii) a description of the tasks that will be undertaken as part of the EIA process;
 - (ix) identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored.

8.1 INTRODUCTION

This section gives a brief outline of the Plan of Study for EIA (PoSEIA) and the tasks that will be undertaken and the anticipated process to meet the objectives for the EIA phase. The approach to the EIA is to focus on those key issues identified for the preferred alternative. This will ensure that the EIA focuses on the most significant impacts and in the process save time and resources.

8.2 ANTICIPATED OUTCOMES OF THE IMPACT ASSESSMENT PHASE

The purpose of the EIA phase is to assess issues identified in the scoping phase and will include an environmental management program (EMPr). The EMPr will provide information on the proposed activity and the manner in which potential impacts will be minimized or mitigated. The EIA report will comply with Appendix 3 and will:

- Determine the policy and legislative context within which the activity is located and document how the proposed activity complies with and responds to the policy and legislative context;

- Describe the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location;
- Identify the location of the development footprint within the preferred site based on an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects of the environment;
- Determine the—
 - (i) nature, significance, consequence, extent, duration and probability of the impacts occurring to inform identified preferred alternatives; and
 - (ii) degree to which these impacts-
 - (aa) can be reversed;
 - (bb) may cause irreplaceable loss of resources, and
 - (cc) can be avoided, managed or mitigated;
- Identify the most ideal location for the activity within the preferred site based on the lowest level of environmental sensitivity identified during the assessment;
- Identify, assess, and rank the impacts the activity will impose on the preferred location through the life of the activity;
- Identify suitable measures to avoid, manage or mitigate identified impacts; and
- Identify residual risks that need to be managed and monitored.

8.3 TASKS TO BE UNDERTAKEN

The following sections describe the tasks that will be undertaken as part of the EIA Phase of the process.

8.3.1 Project Description

Further technical and supporting information will be gathered to provide a more detailed project description. This will include a detailed and finalised site layout plan that will be compiled once the areas of sensitivity identified in this Scoping Report have been confirmed by the specialists.

8.3.2 Consideration of alternatives

The following project alternatives will be investigated in the EIR:

- Design/Layout alternatives: In terms of the actual layout of the proposed PV plant which will only be assessed for the preferred site alternative. A draft facility layout is included in Figure J.

8.3.3 Compilation of Environmental Impact Report (EIR)

A Draft EIR will be compiled to meet the content requirements as per Appendix 3 of GNR. 326 of the EIA Regulations (as amended) and will also include a draft Environmental Management Programme containing the aspects contemplated in Appendix 4 of GNR326. The Generic EMPr for overhead electricity transmission and distribution infrastructure and the Generic EMPr for the development of the associated substation infrastructure for transmission and distribution of electricity as per Government Notice 435, which were published in Government Gazette 42323 on 22 March 2019, will also be included in the Draft EIR.

8.3.4 Public participation

All registered I&APs and relevant State Departments will be given the opportunity to review the Draft Environmental Impact Report in accordance with Regulation R326. A minimum of 30 days commenting period will be allowed and all stakeholders and I&APs will be given an opportunity to forward their written comments within that period. All issues identified during this 30-day review and comment period will be documented and compiled into a Comments and Response Report to be included as part of the Final EIR to be submitted to the DFFE for decision-making on the Application for Environmental Authorisation.

8.4 ASPECTS ASSESSED

Table 8.1 below provides a summary of the aspects that have been assessed. The aspects are also linked to specialist information obtained.

Table 8.1: Aspects assessed

Aspects	Potential impacts	Specialist studies / technical information
Construction of the PV Solar facility	<ul style="list-style-type: none"> Impacts on the fauna and flora 	Ecological Impact Assessment and Avifauna Impact Assessment
	<ul style="list-style-type: none"> Wetlands and riparian areas 	Aquatic Ecology Impact Assessment
	<ul style="list-style-type: none"> Impacts on agricultural potential (soils) 	Soil and Agricultural Compliance Statement
	<ul style="list-style-type: none"> Impacts associated with the geology of the site 	Geotechnical Assessment
	<ul style="list-style-type: none"> Impacts on existing services infrastructure 	Confirmation from the Local Municipality

	<ul style="list-style-type: none"> • Temporary employment, impacts on health and safety 	Social Impact Assessment
	<ul style="list-style-type: none"> • Impacts on heritage resources 	Heritage Impact Assessment and Paleontological Impact Assessment
Operation of the PV Solar facility	<ul style="list-style-type: none"> • Impacts on the fauna and flora 	Ecological Impact Assessment and Avifauna Impact Assessment
	<ul style="list-style-type: none"> • Wetlands and riparian areas 	Aquatic Ecology Impact Assessment
	<ul style="list-style-type: none"> • Impacts on agricultural potential (soils) 	Soil and Agricultural Compliance Statement
	<ul style="list-style-type: none"> • Impacts associated with the geology of the site 	Geotechnical Assessment
	<ul style="list-style-type: none"> • Increased consumption of water 	Confirmed volumes to be provided by the Applicant
	<ul style="list-style-type: none"> • Pressure on existing services infrastructure 	Confirmation from the Local Municipality
	<ul style="list-style-type: none"> • Visual Impact 	Visual Impact Assessment
	<ul style="list-style-type: none"> • Provision of employment and generation of income for the local community 	Social Impact Assessment
Decommissioning of the PV Solar facility	<ul style="list-style-type: none"> • Impacts on the fauna and flora 	Ecological Impact Assessment and Avifauna Impact Assessment
	<ul style="list-style-type: none"> • Socio-economic impacts (loss of employment) 	Social Impact Assessment
Cumulative Impacts	<ul style="list-style-type: none"> • Cumulative biophysical impacts resulting from similar developments in close proximity to the proposed activity. 	All independent specialist studies results to be considered and analysed by the EAP

8.4.1 Specialist studies

Based on the initial descriptions of potential environmental impacts or aspects (refer to Table 6.2), specialists have been subcontracted to assess the potential impacts that may be significant. The specialist studies assess impacts on both the social and the biophysical environment and also help

in identifying ways that can help to mitigate the envisaged impacts. The following specialist studies have been included to address the potentially most significant impact as identified during the scoping phase – refer to Table 6.2:

- Geotechnical report: To determine whether the geotechnical conditions at the site are favorable for the development and construction of a solar PV plant.
- Heritage Impact Assessment: To determine whether the proposed activity will impact on any heritage or archeological artifacts.
- Ecological Impact Assessment: To determine what the impact of the proposed activity will be on the ecology (fauna and flora) in the area.
- Aquatic Ecology Impact Assessment: To determine the impact of the proposed activity on the wetlands present on Farm Vijeboom No. 714, Farm Rorich's Hulp No. 505, Farm Klein Palmietfontein No. 370, and Farm De Dorpsgronden Van Luckhoff No. 577.
- Avifauna Impact Assessment: To determine what the impacts of the proposed activity will have on the birds (avifauna) in the area.
- Visual Impact Assessment: To determine to what extent the proposed activity will be visually intrusive to the surrounding communities or other receptors.
- Soil and Agricultural Compliance Statement: To determine how the proposed activity will impact on soil and agricultural resources.
- Social Impact Assessment: To determine how the proposed activity will impact on the socio-economic environment.
- Palaeontological Impact Assessment: To determine the impacts on palaeontological resources.
- Traffic Impact Assessment: To determine the impacts on road users on long haul routes and roads around the project area.

8.4.2 Terms of reference for specialist studies

Specialists in their field of expertise will consider baseline data and identify and assess impacts according to predefined rating scales (section 8.5). Specialists will also suggest optional or essential ways in which to mitigate negative impacts and enhance positive impacts. Further, specialists will, where possible, take into consideration the cumulative effects associated with this and other projects which are either developed or in the process of being developed in the local area. The specialist is reminded to follow the latest DFFE protocols.

The results of these specialist studies have been integrated into the draft Scoping Report. The general requirements proposed for the inputs are presented below and specialists are encouraged to comment and provide input on these. The Terms of Reference (ToR) for each specialist study are include as Appendix E10 to the report.

General Requirements

Specialists' reports must comply with Appendix 6 of GNR. 326 published under sections 24(5), and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended and whereby the following are to be included:

- The details of-
 - the specialist who prepared the report; and
 - the expertise of that specialist to compile a specialist report including a curriculum vitae;
- A declaration that the specialist is independent in a form as may be specified by the competent authority;
- An indication of the scope of, and the purpose for which, the report was prepared;
 - An indication of the quality and age of base data used for the specialist report;
 - A description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;
- The duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment;
- A description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used;
- Details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;
- An identification of any areas to be avoided, including buffers;
- A map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;
- A description of any assumptions made and any uncertainties or gaps in knowledge;
- A description of the findings and potential implications of such findings on the impact of the proposed activity, or activities;
- Any mitigation measures for inclusion in the EMPr;
- Any conditions for inclusion in the environmental authorisation;
- Any monitoring requirements for inclusion in the EMPr or environmental authorisation;
- A reasoned opinion-

- whether the proposed activity, activities or portions thereof should be authorised;
 - regarding the acceptability of the proposed activity or activities; and
- if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMP, and where applicable, the closure plan;
- A description of any consultation process that was undertaken during the course of preparing the specialist report;
- A summary and copies of any comments received during any consultation process and where applicable all responses thereto; and
- Any other information requested by the competent authority.

In addition to the above, specialists are expected to:

- Review the Scoping Report, with specific reference to the Comments and Response Report to familiarize with all relevant issues or concerns relevant to their field of expertise;
- In addition to the impacts listed in the Scoping Report, identify any issue or aspect that needs to be assessed and provide expert opinion on any issue in their field of expertise that they deem necessary in order to avoid potential detrimental impacts;
- Assess the degree and extent of all identified impacts (including cumulative impacts) that the preferred project activity and its proposed alternatives, including that of the no-go alternative, may have;
- Identify and list all legislation and permit requirements that are relevant to the development proposal in context of the study;
- Reference all sources of information and literature consulted; and
- Include an executive summary to the report.

8.5 METHOD OF ENVIRONMENTAL ASSESSMENT

The environmental assessment aims to identify the various possible environmental impacts that could result from the proposed activity. Different impacts need to be evaluated in terms of its significance and in doing so highlight the most critical issues to be addressed.

Significance is determined through a synthesis of impact characteristics which include context and intensity of an impact. Context refers to the geographical scale i.e., site, local, national or global whereas intensity is defined by the severity of the impact e.g., the magnitude of deviation from background conditions, the size of the area affected, the duration of the impact and the overall probability of occurrence. Significance is calculated as shown in Table 8.2.

Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The total number of points scored for each impact indicates the level of significance of the impact.

8.5.1 Impact Rating System

Impact assessment must take account of the nature, scale and duration of impacts on the environment whether such impacts are positive or negative. Each impact is also assessed according to the project phases:

- planning
- construction
- operation
- decommissioning

Where necessary, the proposal for mitigation or optimisation of an impact should be detailed. A brief discussion of the impact and the rationale behind the assessment of its significance should also be included. The rating system is applied to the potential impacts on the receiving environment and includes an objective evaluation of the mitigation of the impact. In assessing the significance of each impact the following criteria is used:

Table 8.2: The rating system

NATURE		
Include a brief description of the impact of environmental parameter being assessed in the context of the project. This criterion includes a brief written statement of the environmental aspect being impacted upon by a particular action or activity.		
GEOGRAPHICAL EXTENT		
This is defined as the area over which the impact will be experienced.		
1	Site	The impact will only affect the site.
2	Local/district	Will affect the local area or district.
3	Province/region	Will affect the entire province or region.
4	International and National	Will affect the entire country.
PROBABILITY		
This describes the chance of occurrence of an impact.		
1	Unlikely	The chance of the impact occurring is extremely low (Less than a 25% chance of occurrence).

2	Possible	The impact may occur (Between a 25% to 50% chance of occurrence).
3	Probable	The impact will likely occur (Between a 50% to 75% chance of occurrence).
4	Definite	Impact will certainly occur (Greater than a 75% chance of occurrence).
DURATION		
This describes the duration of the impacts. Duration indicates the lifetime of the impact as a result of the proposed activity.		
1	Short term	The impact will either disappear with mitigation or will be mitigated through natural processes in a span shorter than the construction phase (0 – 1 years), or the impact will last for the period of a relatively short construction period and a limited recovery time after construction, thereafter it will be entirely negated (0 – 2 years).
2	Medium term	The impact will continue or last for some time after the construction phase but will be mitigated by direct human action or by natural processes thereafter (2 – 10 years).
3	Long term	The impact and its effects will continue or last for the entire operational life of the development, but will be mitigated by direct human action or by natural processes thereafter (10 – 30 years).
4	Permanent	The only class of impact that will be non-transitory. Mitigation either by man or natural process will not occur in such a way or such a time span that the impact can be considered indefinite.
INTENSITY/ MAGNITUDE		
Describes the severity of an impact.		
1	Low	Impact affects the quality, use and integrity of the system/component in a way that is barely perceptible.
2	Medium	Impact alters the quality, use and integrity of the system/component but system/component still continues to function in a moderately modified way

		and maintains general integrity (some impact on integrity).
3	High	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component is severely impaired and may temporarily cease. High costs of rehabilitation and remediation.
4	Very high	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component permanently ceases and is irreversibly impaired. Rehabilitation and remediation often impossible. If possible rehabilitation and remediation often unfeasible due to extremely high costs of rehabilitation and remediation.
REVERSIBILITY		
This describes the degree to which an impact can be successfully reversed upon completion of the proposed activity.		
1	Completely reversible	The impact is reversible with implementation of minor mitigation measures.
2	Partly reversible	The impact is partly reversible but more intense mitigation measures are required.
3	Barely reversible	The impact is unlikely to be reversed even with intense mitigation measures.
4	Irreversible	The impact is irreversible and no mitigation measures exist.
IRREPLACEABLE LOSS OF RESOURCES		
This describes the degree to which resources will be irreplaceably lost as a result of a proposed activity.		
1	No loss of resource	The impact will not result in the loss of any resources.
2	Marginal loss of resource	The impact will result in marginal loss of resources.
3	Significant loss of resources	The impact will result in significant loss of resources.
4	Complete loss of resources	The impact is result in a complete loss of all resources.
CUMULATIVE EFFECT		

<p>This describes the cumulative effect of the impacts. A cumulative impact is an effect which in itself may not be significant but may become significant if added to other existing or potential impacts emanating from other similar or diverse activities as a result of the project activity in question.</p>		
1	Negligible cumulative impact	The impact would result in negligible to no cumulative effects.
2	Low cumulative impact	The impact would result in insignificant cumulative effects.
3	Medium cumulative impact	The impact would result in minor cumulative effects.
4	High cumulative impact	The impact would result in significant cumulative effects
<p>SIGNIFICANCE</p>		
<p>Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The calculation of the significance of an impact uses the following formula: (Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity.</p> <p>The summation of the different criteria will produce a non-weighted value. By multiplying this value with the magnitude/intensity, the resultant value acquires a weighted characteristic which can be measured and assigned a significance rating.</p>		
Points	Impact significance rating	Description
6 to 28	Negative low impact	The anticipated impact will have negligible negative effects and will require little to no mitigation.
6 to 28	Positive low impact	The anticipated impact will have minor positive effects.
29 to 50	Negative medium impact	The anticipated impact will have moderate negative effects and will require moderate mitigation measures.
29 to 50	Positive medium impact	The anticipated impact will have moderate positive effects.
51 to 73	Negative high impact	The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact.

51 to 73	Positive high impact	The anticipated impact will have significant positive effects.
74 to 96	Negative very high impact	The anticipated impact will have highly significant effects and are unlikely to be able to be mitigated adequately. These impacts could be considered "fatal flaws".
74 to 96	Positive very high impact	The anticipated impact will have highly significant positive effects.

8.6 CONSULTATION WITH THE COMPETENT AUTHORITY

Consultation with the competent and commenting authorities will continue throughout the duration of impact assessment phase. The authorities will also comment on whether they deem it necessary to conduct additional specialist studies other than what is proposed already in this PoSEIA. On-going consultation will include:

- Submission of the Final EIR following a 30-day public review period (and consideration of comments received).
- Arrangements will be made to discuss the report with the Environmental Officer responsible for the project during the review period, where required.

9 CONCLUSION

This Draft Scoping Report is aimed at identifying the 'scope' of the EIA that will be conducted in respect of the activity for which authorization is being applied for. It can be concluded that:

- The scoping phase complied with the specifications set out in Regulations 21 and Appendix 2 of GNR326.
- All key consultees have been consulted as required by the Regulations 39 to 44.

Based on the contents of the report the following key environmental issues were identified which need to be addressed in the EIA report:

- Impacts during construction phase:
 - Direct habitat destruction (- Medium)
 - Habitat Fragmentation (- Medium)
 - Impact on the characteristics of the watercourse (- Medium)
 - Creation of direct and indirect employment opportunities (+ Medium)
 - Economic multiplier effects from the use of local goods and services (+ Medium)
 - Impacts on daily living patterns (- Medium)
- Impacts during the operational phase:
 - Habitat destruction and fragmentation (- Medium)
 - Displacement of priority avian species from important habitats (- Medium)
 - Impact on the characteristics of the watercourse (- Medium)
 - Creation of employment opportunities and skills development. (+ Medium)
 - Development of non-polluting, renewable energy infrastructure. (+ Medium)
 - Contribution to LED and social upliftment (+ High)
- Impacts during the decommissioning phase:
 - Improvement of habitat through revegetation / succession over time (+ Medium)
- Cumulative biophysical impacts resulting from similar development in close proximity to the proposed activity.

No fatal flaws or impacts of a high significance has been identified to be associated with the proposed development. The issues identified will be addressed in more detail in the EIA report as part of the EIA Phase.

Considering the environmental sensitive features present within the development footprint, as identified in this Scoping Report, the Applicant has proposed a draft facility layout which currently considers technical constraints. The environmental sensitive features as identified within this scoping report will be further investigated in the detailed EIA phase and thereby will aim to avoid any direct impact on these features. As part of this optimisation process associated infrastructure, will be reconsidered if required and shifted outside of these sensitive environmental features and areas. The draft layout will be further assessed and optimised as part of the EIA Phase of the project to ensure that the development footprint within the affected property is appropriate from an environmental perspective, and thereby avoids the present sensitive environmental features and areas as identified by the independent specialists, Refer to Figure J for the draft layout proposed for development.

The EAP therefore recommends that:

The scoping report be approved after which the EIA process, as required by Regulations 23 to 24 may commence.

We trust that the Department of Forestry, Fisheries and the Environment find the report in order and we eagerly await your comments in this regard.

Ms. Roschel Maharaj

Environamics Environmental Consultants



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