

# THE DEVELOPMENT OF THE 100MW LICHTENBURG 2 PHOTOVOLTAIC SOLAR ENERGY FACILITY AND ITS ASSOCIATED INFRASTRUCTURE NEAR LICHTENBURG, NORTH WEST PROVINCE

Motivation for Amendment of Environmental  
Authorisation

DFFE Ref.: 14/12/16/3/3/1/1092

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## PROJECT DETAILS

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<b>Title</b>	:	The development of the 100MW Lichtenburg 2 Photovoltaic Solar Energy Facility and its associated infrastructure near Lichtenburg, within Ditsobotla Local Municipality, North West Province
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<b>Client</b>	:	ABO Wind Lichtenburg 2 PV (Pty) Ltd
<b>Report Status</b>	:	Revision 0 – First issue: Draft for Public Review

**When used as a reference this report should be cited as:** Savannah Environmental (2022) Motivation for the Amendment of the Environmental Authorisation for the development of the 100MW Lichtenburg 2 Photovoltaic Solar Energy Facility and its associated infrastructure near Lichtenburg, within Ditsobotla Local Municipality, North West Province.

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## PURPOSE OF THE REPORT

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ABO Wind Lichtenburg 2 PV (Pty) Ltd (hereafter 'ABO') received an Environmental Authorisation (EA) on 03 July 2019<sup>1</sup> (DFFE Ref.: 14/12/16/3/3/1/1092). The findings of the assessment are detailed below (Appendix B) from the Department of Forestry, Fisheries and the Environment (DFFE) for the development of the Lichtenburg 1 PV Solar Energy Facility is located 10km north of Lichtenburg and 7km south-east of Bakerville in the North West Province. The project is located within Ward 16 of the Ditsobotla Local Municipality and the Ngaka Modiri Molema District Municipality in the North West Province. The development footprint of the solar energy facility is located on Portion 23 of the Farm Houthaaldoors No. 31 and the Remaining Extent of Portion 2 of the Farm Zamenkomst No. 4.

The original EA dated 02 July 2019 (DFFE Ref.: 14/12/16/3/3/1/1092) however states powerline Alternative 1, on-site substation alternative 1 as the approved alternatives on Portion 2 of Farm Zamenkomst No. 4. ABO is now requesting the DFFE to amend the EA dated 18 May 2015 (DFFE Ref.: 14/12/16/3/3/1/1/1092) as follows:

- » Amendment of the preferred power line corridor to allow connection of Lichtenburg 2 PV to the Collector Substation Complex at Lichtenburg 3 PV.
- » A change in the capacity of the step-up/on-site substation from 88/132kV to 33/132kV;
- » a substitution of the wording in the EA, 'a new 132kV overhead power line from the on-site substation to the Mmabatho/Watershed DS 1 88kV power line', with, 'a new 132kV power line from Lichtenburg 2 PV's step-up/on-site substation to a proposed collector substation complex on Lichtenburg 3 PV'.

It should be noted that the Lichtenberg 3 PV project has been selected as Preferred Bidder in a private Power Purchase Agreement (PPA). The original Eskom Cost Estimate Letters (CELs) were issued separately for each project within the larger cluster (Lichtenberg 1 PV, 2 PV and 3 PV). When considering the three projects together, Eskom has advised the following:

- » The existing power line approved for LILO (Alternative 1 as authorised) does not have sufficient capacity.
- » One power line to Watershed for all three projects from a central collector substation is preferred.

The proposed amendment will allow connection of Lichtenburg 2 PV to the proposed Collector Substation Complex of ABO Wind Lichtenburg 3 PV on the authorised footprint of Lichtenburg 3 PV.

The proposed amendment in itself does not trigger any new listed activity as the proposed amendment is within the originally assessed grid corridor and development area and does not exceed any thresholds for activities already authorised.

In terms of Condition 5 of the original EA and Chapter 5 of the EIA Regulations of December 2014 (as amended on 07 April 2017 and 13 July 2018), it is possible for an applicant to apply, in writing, to the competent authority for a change or deviation from the project description to be approved.

Savannah Environmental (Pty) Ltd (hereafter 'Savannah Environmental') has been appointed to undertake an amendment application process in this regard and has prepared this Draft Motivation Report in support of this amendment application on behalf of ABO. This report aims to provide details pertaining to the significance and impacts of the proposed change to the project description in order for Interested and

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<sup>1</sup> Subsequent amendments of the EA were issued on the 05 August 2019 and 25 March 2021.

Affected Parties (I&APs) to be informed of the proposed amendment and provide comments, and for the competent authority to be able to reach a decision in this regard. This report is supported by specialist studies in order to inform the final conclusion regarding the proposed amendment (refer to **Appendix A to D** of this report). This main report must be read together with these specialist studies in order to obtain a complete understanding of the proposed amendment and the implications thereof.

The Draft Motivation Report has been made available to registered I&APs on the Savannah Environmental Website (<https://savannahsa.com/public-documents/energy/>) for a 30-day review and comment period from **Thursday, 14 April 2022 to Thursday, 19 May 2022**. The availability of the Draft Motivation Report has been advertised in Die Noordwester Newspaper on **Thursday, 14 April 2022**.

To obtain further information, register on the project database, or submit written comment, please contact:

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All comments received during the review period will be included within a Comments and Responses Report to be submitted to the DFFE with the Final Motivation Report for decision making purposes.

# 1. OVERVIEW OF THE PROJECT

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## 1.1. Location

The authorised project is located 10km north of Lichtenburg and 7.5km south- of Bakerville in the North West Province. The project is located within Ward 16 of the Ditsobotla Local Municipality and the Ngaka Modiri Molema District Municipality in the North West Province. The development footprint of the solar energy facility and associated infrastructure is located on Portion 23 of the Farm Houthaaldoors No. 31 and the Remaining Extent of Portion 2 of the Farm Zamenkomst No. 2. It is within this property that the project will be constructed and operated (refer to **Figure 1.1**).

## 1.2. Potential Environmental Impacts as determined through the BA process

From the specialist investigations undertaken within the Environmental Impact Assessment (EIA) process for the development of the 100MW Lichtenburg 2 PV Facility and its associated infrastructure, the following environmental impacts were identified:

- » Potential ecological impacts;
- » Potential impacts on avifauna;
- » Potential impacts on heritage resources; and
- » Areas of visual impact.

Key conclusions and recommendations of the original EIA pertinent to this application, as reported in the final EIA Report (Savannah Environmental (Pty) Ltd, 2019) are detailed below.

### 1.2.1. Summary of environmental findings

From the specialist investigations undertaken as part of the EIA process for the development of the 100MW Lichtenburg 2 PV Facility and its associated infrastructure, no environmental fatal flaws were identified to be associated with the construction of the proposed Project and/or the assessed alternatives. The significance levels of the majority of identified negative impacts can generally be reduced to acceptable levels through implementation of the recommended mitigation measures.

The following summaries were provided for the specialist studies at submission of the final EIA Report (2019):

### 1.2.1 Results of the Ecological Impact Assessment

The entire Lichtenburg 2 project site has been identified as being of a medium ecological sensitivity based on the presence of Savanna Grassland throughout the project site and power line corridor alternatives. Other areas of medium sensitivity are also present throughout the project site and the power line corridor alternatives which relates to the presence of Palaeo-Drainage Grassland. The only area considered to be sensitive from an ecological perspective is a cluster of *Vachellia (Acacia) erioloba* trees located within the grid connection corridor. Within the report, it was stated that the disturbance of this tree cluster can be successfully avoided through the micro-alignment of the power line (slight route deviation) in this area.



Subsequently, with the implementation of the recommended route deviation around the *V. erioloba* cluter, the grid connection corridor was considered to be acceptable from an ecological perspective.

From the findings of the Ecological and Hydrological Impact Assessment it can be concluded that no impacts of high ecological or hydrological significance were identified which would hinder the development of Lichtenburg 2 and its associated infrastructure within the project site. The proposed development is considered to be appropriate and acceptable from an ecological and surface hydrological perspective and will not result in detrimental impacts to ecosystems and habitat features present within the project site and within the surrounding properties. The specialist has therefore indicated that the development may be authorised, constructed and operated, subject to the implementation of the recommended mitigation measures.

### **1.2.2 Results of the Avifauna Impact Assessment**

The Avifauna Impact Assessment was based on the findings of point count sampling techniques applied during two site visits undertaken in July 2018 and October 2018 (i.e. wet and dry season site visits). The avifauna impacts identified to be associated with Lichtenburg 2 will be negative and local to regional in extent. The duration of the impacts will be medium to long-term, for the lifetime of the PV facility.

Areas of moderately high avifauna sensitivity are located within the eastern and western sections of the project site, which relates to the presence of Open Dolomite Grassland or Bush Clump Mosaics. These represent habitat or areas where a high number of bird species were recorded, but also include direct observations of collision-prone bird species. These areas also form part of the home ranges of the Northern Black Korhaan (*Afrotis afraoides*). Other features present within the project site considered to be of a moderately high avifauna sensitivity include artificial watering points located in the eastern portion of the project site. These watering points attract large numbers of granivore passerine and non-passerine bird species due to the availability of water. Development within the moderately high avifauna sensitivity areas is permissible, and these areas are not considered to be restricted in terms of the placement of infrastructure associated with Lichtenburg 2. Areas of moderately high sensitivity are also located within the power line corridor alternatives.

Areas of medium avifauna sensitivity are areas related to the presence of Open Dolomite Grasslands or Bush Clump Mosaics, power line servitudes and wet grasslands. These habitat types provide suitable foraging habitat for certain threatened and near threatened bird species, including large terrestrial bird species (e.g. Northern Black Korhaan) with the potential to interact (e.g. collide) with the proposed electrical infrastructure. However, reporting rates at the site for threatened and near threatened bird species was relatively low, thereby suggesting a medium sensitivity within these areas, even though the majority of the habitat is natural.

Areas of low sensitivity are represented by artificial habitat types and include agricultural land, fallow land and pastures. It represents transformed habitat, thereby contributing little towards local biodiversity. The avifauna impacts identified to be associated with Lichtenburg 1 will be negative and local to regional in extent. The duration of the impacts will be medium to long-term, for the lifetime of the PV facility.

During the construction phase of Lichtenburg 2 a loss of habitat due to clearance of vegetation is expected to occur. The significance of this impact can be reduced to low with the implementation of the recommended mitigation measures provided by the specialist.

The majority of the avifauna impacts associated with the development of Lichtenburg 2 will occur during the operation phase. These impacts include the creation of "new" avian habitat which refers to the creation of novel habitat for commensal or superior competitive bird species, the electrocution of birds due to the associated power line, and collision with the PV panels and power line. The significance of the impacts will be low to medium, with the exception of a high significance for the impact of avian collision with the power line.

From the results of the avifauna assessment, it can be concluded that no fatal-flaws will be associated with the development of Lichtenburg 1 from an avifaunal perspective.

### **1.2.3 Results of the Heritage Impact Assessment**

The project site has been disturbed and transformed by agricultural activities which has led to the presence of pre-existing agricultural plough fields, grazing areas and farm buildings. Furthermore, throughout the agricultural areas within the project site, several heaps of rocks which have been removed from the agricultural fields were identified. No archaeological resources, graves or burial grounds were identified within the project site. In addition, no structures of heritage importance were recorded.

Considering the palaeontology of the project site, it was identified that the area in question is located within the Malmani Group which contains a number of stromatolitic dolomites. The geological structures of the project site suggest that the rocks are much too old to contain fossils other than blue-green algae. Taking account of the defined criteria, the potential impact to fossil heritage resources is negligible to extremely low.

The Heritage Impact Assessment identified impacts associated with the construction and operation of Lichtenburg 2. The assessment of impacts on heritage resources includes an assessment of the archaeology and palaeontology of the project site.

Impacts on palaeontological and archaeological resources are expected to occur during the construction phase of Lichtenburg 2. The impacts relate to the excavations required for the construction of the facility and will occur only in the event that an archaeological or palaeontological resource is present. The significance of the impact will be low and no mitigation has been recommended by the specialist due to the lack of heritage resources within the area. The requirement for the development and implementation of a chance find procedure in the event of a heritage find has been included.

### **1.2.4 Results of the Visual Impact Assessment**

The Visual Impact Assessment indicated that the construction and operation of Lichtenburg 2 PV Facility and its associated infrastructure may have a visual impact on the area surrounding the project site, especially within (but not restricted to) a 3km radius of the facility. The visual impact will differ amongst places, depending on the distance from the facility.

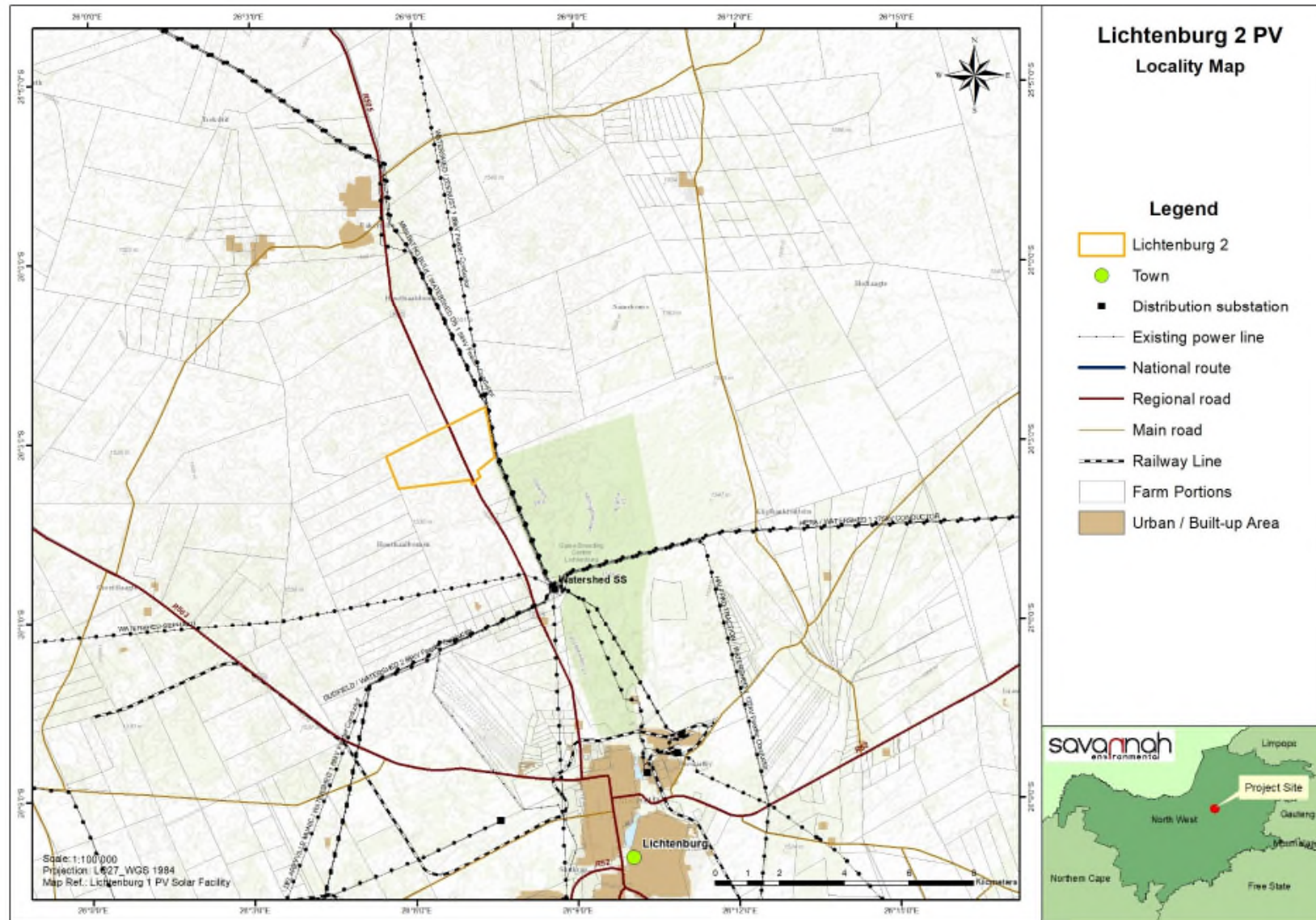
Farm settlements or residences occur at irregular intervals throughout the area. Some of these in close proximity to the Lichtenburg 3 project site, include:

» Brakpan

- » Grasfontein
- » Sensako
- » Henriksdal
- » Scherppunt
- » Boskoppie
- » Klipbankfontein
- » Klipkuil
- » Manana
- » Houthaaldoorns
- » Greeflaagte
- » Houthaalbomen
- » Elandsfontein
- » Welverdiend
- » Samekoms
- » Ruiglaagte

There are also a large number of existing power lines associated with the existing Watershed Substation located within the surrounding area of the project site. Besides the electricity transmission and distribution infrastructure, the project site and the surroundings are relatively undeveloped. The site is located in an area that has a distinct rural and agricultural character, with some mining/quarrying activity located north of Lichtenburg and north-west of the site near Grasfontein and Bakerville.

Overall, the significance of the visual impacts is expected to range from moderate to low as a result of the generally undeveloped character of the landscape. The facility would be visible within an area that incorporates certain sensitive visual receptors who would consider visual exposure to this type of infrastructure to be intrusive. Such visual receptors include people travelling along roads and residents of rural homesteads and settlements



**Figure 1.1:** Locality map illustrating the location of the project site under investigation for the establishment of Lichtenburg 2 PV Facility on a site near Lichtenburg, North West Province (**A3 Map included in Appendix F**).

## 2. DETAILS OF THE AMENDMENTS APPLIED FOR

This section of the report details the amendments considered within this report and by the specialist investigations (refer to **Appendix A – D**), and as applied for by ABO.

### 2.1. Amendment of the authorised power line alternative

On page 4 of the EA dated 01 July 2019, under activities authorised, it is requested that the authorised power line corridor be amended as follows:

**From:**

Power line Corridor Alternative 1	Latitude	Longitude
Starting point of activity	26°02'56.931"	26°07'14.418"
Middle point of activity	26°02'40.495"	26°07'46.746"
End point of activity	26°02'25.745"	26°07'22.812"

**To:**

Power line Corridor Alternative 2	Latitude	Longitude
Starting point of activity	<u>26°02'58.75"</u>	<u>26°06'15.36"</u>
Middle point of activity	<u>26°02'42.66</u>	<u>26°07'53.11"</u>
End point of activity	<u>26°02'25.84"</u>	<u>26°07'38.66"</u>

### 2.2. Amendment of Activities Authorised section of the EA

The Applicant is requesting to change the wording included in Authorised Activities section of the EA dated 01 July 2019 as follows:

EA Page Reference	Current wording (EA dated 02 July 2019)	Requested amendment wording (amendment underlined)
Page 5 of the EA, Activities Authorised	Onsite 88/132kV Substation.	Onsite 33/132kV Substation.
	A new 132kV overhead powerline from the on-site substation to the Mmabatho/Watershed DS 1 88kV Powerline.	A new 132kV overhead powerline from <u>the PV facility to connect to the step-up/onsite substation and then to connect to the collector substation complex located at the Lichtenberg PV3 Facility.</u>

### 2.3. Amendment of Technical Details section of the EA

The Applicant is requesting to change the wording included in the Technical Details section of the EA dated 01 July 2019 as follows:

Component From:	Requested amendment wording (amendment underlined)
On-site 88/132kV Substation.	<u>88/132kV</u>

**To:**

Component	Description/Dimensions
On-site substation	33/132kV

**2.4. Amendment of the authorised Farm Description**

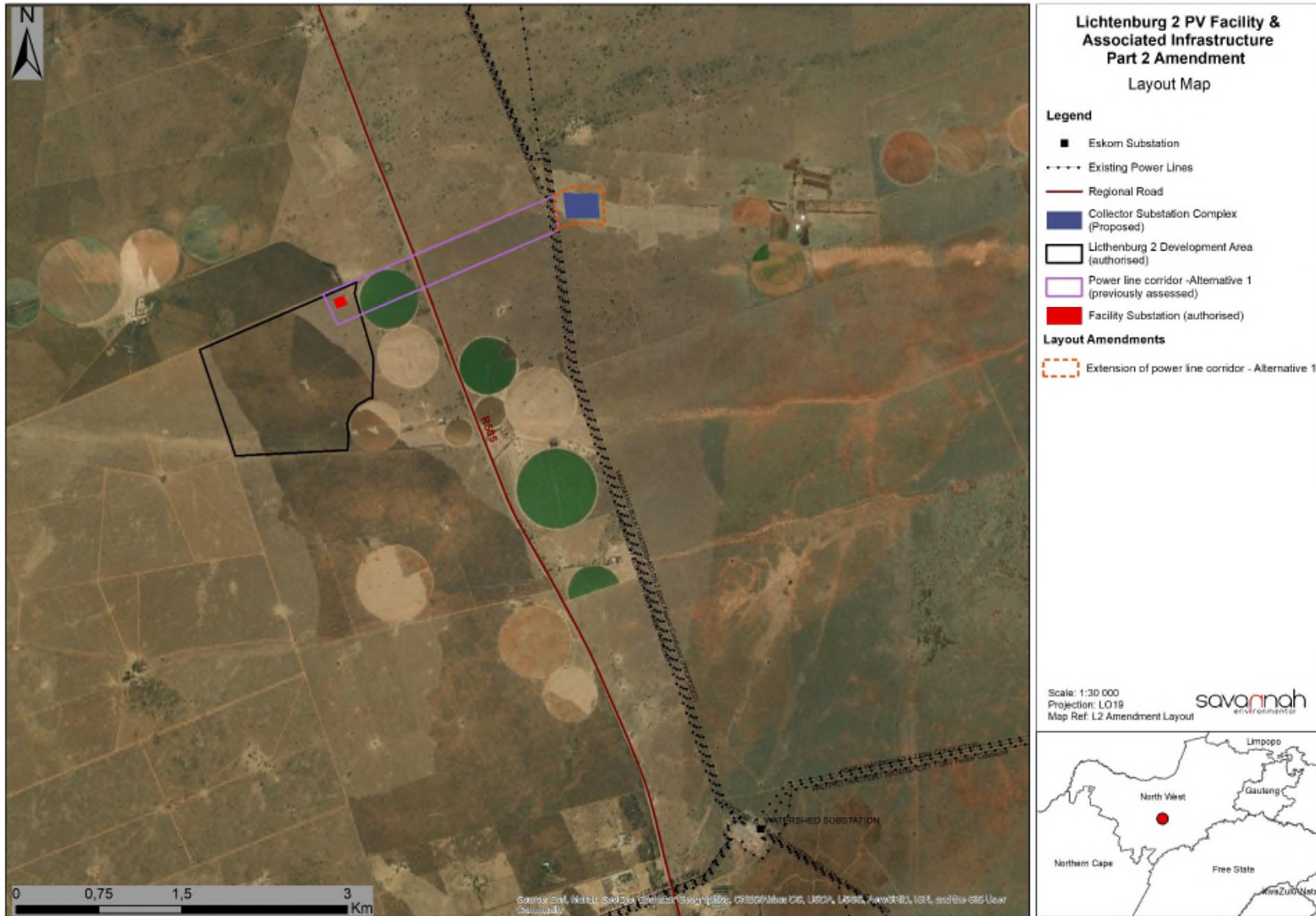
In order to include all relevant farm portions associated with the project, it is requested that the listed properties be amended as follows:

**From:**

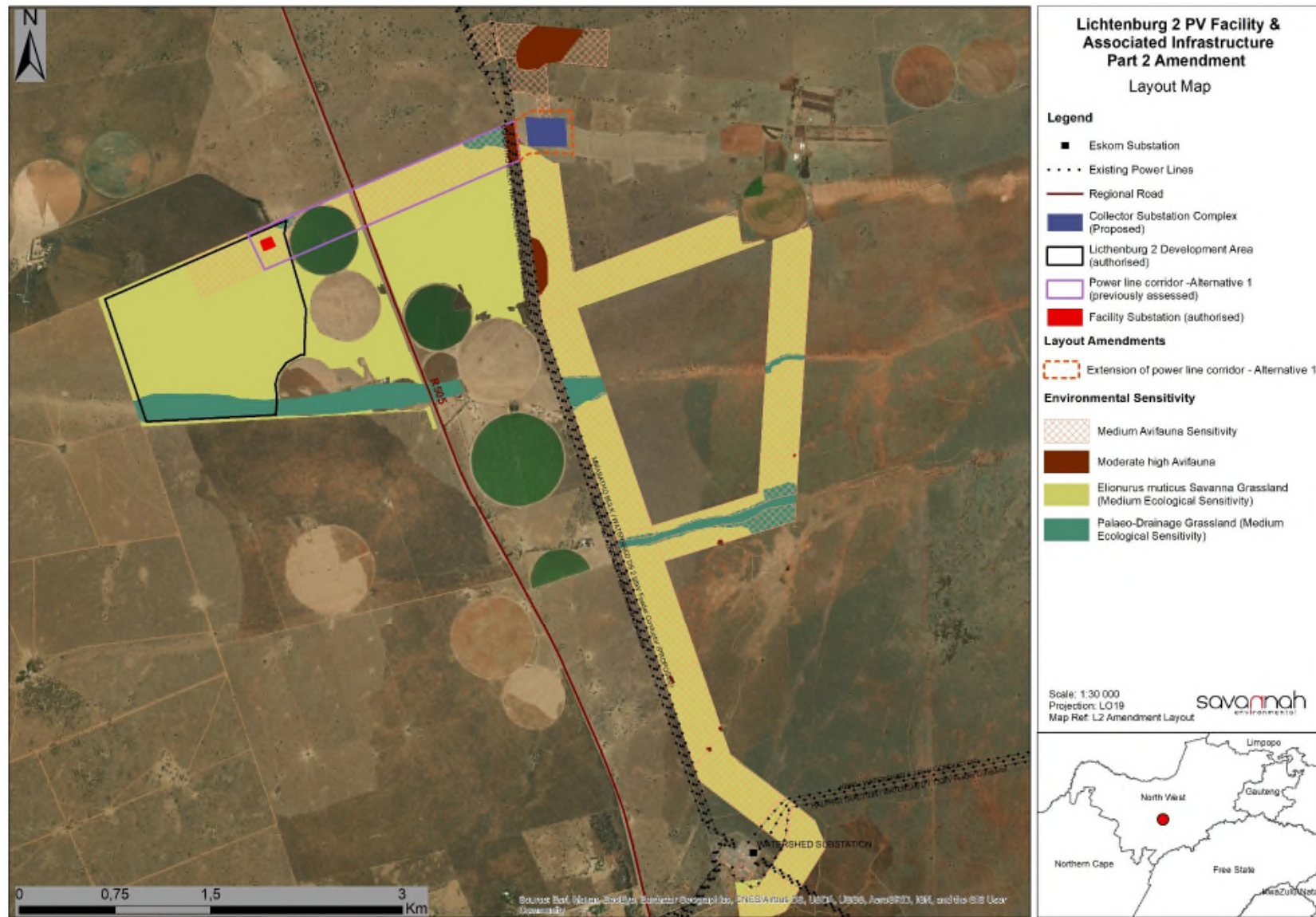
EA Page Reference	Farm Description	21 Digit Surveyor General Code
Page 4 of the EA	Remaining Extent of Portion 2 of the Farm Zamenkomst No. 4	TOIP0000000004000002
	Portion 23 of the Farm Houthaalboomen No. 31	TOIP000000000031000023

**To:**

EA Page Reference	Farm Description	21 Digit Surveyor General Code
Page 4 of the EA	Remaining Extent of Portion 2 of the Farm Zamenkomst No. 4	TOIP0000000004000002
	Portion 23 of the Farm Houthaalboomen No. 31	TOIP000000000031000023
	Portion 6 of the Farm Zamenkomst No. 4	TOIP00000000004000006



**Figure 2.1:** Layout of the grid connection corridor alternative 2 and the location of the development footprint of the collector substation complex and the Lichtenburg 2 PV Facility (A3 Map included in Appendix F).



**Figure 2.2:** Layout of the grid connection corridor alternative 2 for the Lichtenburg 2 PV Facility overlain onto the identified environmental sensitivities (2019) (A3 Map included in **Appendix F**).



### **3. REASONS FOR THE PROPOSED AMENDMENTS**

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This section of the report details the motivation for the proposed amendments included in Section 2 of this report.

#### **3.1. Amendment of the authorised power line and amendment of Activities Authorised section of the EA**

The Lichtenberg 1 PV, 2 PV and 3 PV projects have been selected as Preferred Bidders in a private PPA. The original Eskom Cost Estimate Letters (CELs) were issued separately for each project within the larger cluster (Lichtenberg 1 PV, 2 PV and 3 PV). When considering the three projects together, Eskom has advised the following:

- » The existing power line approved for LILO (Alternative 1 as authorised) does not have sufficient capacity.
- » One power line to Watershed for all three projects from a central collector substation is preferred.

Therefore, the proposed amendment will allow the connection of Lichtenburg 2 PV to the proposed collector substation on the authorised footprint of Lichtenburg 3 PV.

## 4. CONSIDERATIONS IN TERMS OF THE REQUIREMENTS OF THE EIA REGULATIONS

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In terms of Regulation 31 of the EIA Regulations 2014, as amended, an environmental authorisation may be amended by following the process in this Part (i.e., a Part 2 amendment) if it is expected that the amendment may result in an increased level or change in the nature of impact where such level or change in nature of impact was not:

- a) Assessed and included in the initial application for environmental authorisation; or
- b) Taken into consideration in the initial authorisation.

The following proposed amendments of the EA, do not constitute a listed or specified activity:

- » Amendment of the preferred power line corridor to allow connection of Lichtenburg 2 PV to the Collector Substation Complex at Lichtenburg 3 PV.
- » A change in the capacity of the step-up/on-site substation from 88/132kV to 33/132kV;
- » a substitution of the wording in the EA, 'a new 132kV overhead power line from the on-site substation to the Mmabatho/Watershed DS 1 88kV power line', with, 'a new 132kV power line from Lichtenburg 2 PV's step-up/on-site substation to a proposed collector substation complex on Lichtenburg 3 PV'.

Therefore, the application is made in terms of Regulation 31 (a).

Savannah Environmental has been appointed as independent consultants to undertake the application for amendment on behalf of ABO. This Motivation Report has been prepared in support of this amendment application and aims to provide detail pertaining to the significance and impacts of the proposed change to the project description in order for I&APs to be informed of the proposed amendments and provide comment, and for the competent authority to be able to reach a decision in this regard. This report is supported by specialist studies in order to inform the final conclusion regarding the proposed amendments (refer to **Appendix A to D** of this report). This main report must be read together with these specialist studies in order to obtain a complete understanding of the proposed amendments and the implications thereof.

Neither Savannah Environmental nor any of its specialists are subsidiaries of or are affiliated to ABO. Furthermore, Savannah Environmental does not have any interest in secondary developments that may arise out of the authorisation of the proposed project.

Savannah Environmental is a specialist environmental consulting company providing a holistic environmental management service, including environmental assessment and planning to ensure compliance and evaluate the risk of development, and the development and implementation of environmental management tools. Savannah Environmental benefits from the pooled resources, diverse skills and experience in the environmental field held by its team.

The Savannah Environmental team have considerable experience in environmental impact assessments and environmental management and have been actively involved in undertaking environmental studies for a wide variety of projects throughout South Africa, including those associated with electricity generation.

- » **Tebogo Mapinga** is an experienced professional with 15 years across the fields of environment and permitting in both the public and the private sector. She holds a BSc Degree (Major in Physiology and Zoology) from the University of Limpopo (Turfloop Campus). Her competencies lie in Environmental Impact Assessments, Basic Assessments, Environmental Screening, Environmental Management Plan, Compliance monitoring and obtaining permits for small and large scale projects. She is a member of the International Association for Impact Assessments (IAIA) and is a registered professional natural scientist as a Professional Natural Scientist with the South African Council for Natural Scientific Professions (SACNASP - 115518).
  
- » **Jo-Anne Thomas** is a registered EAP with the Environmental Assessment Practitioners Association of South Africa (EAPASA) and is the registered EAP for this project (EAPASA - 2019/726). She provides technical input for projects in the environmental management field, specialising in Strategic Environmental Advice, Environmental Impact Assessment studies, environmental auditing and monitoring, environmental permitting, public participation, Environmental Management Plans and Programmes, environmental policy, strategy and guideline formulation, and integrated environmental management. Her key focus is on integration of the specialist environmental studies and findings into larger engineering-based projects, strategic assessment, and providing practical and achievable environmental management solutions and mitigation measures. Responsibilities for environmental studies include project management (including client and authority liaison and management of specialist teams); review and manipulation of data; identification and assessment of potential negative environmental impacts and benefits; review of specialist studies; and the identification of mitigation measures. She has managed the EIA processes for more than 100 renewable energy projects (including wind, solar and hydro) across South Africa.

## 5. POTENTIAL FOR CHANGE IN THE SIGNIFICANCE OF IMPACTS AS ASSESSED IN THE BA AS A RESULT OF THE PROPOSED AMENDMENTS

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This application is considered to be a Part 2 amendment as contemplated in terms of Regulation 31 of the EIA Regulations (2014), as amended. In terms of Regulation 32(1)(a)(i), the following section provides an assessment of the impacts related to the proposed change. Understanding the nature of the proposed amendments and the impacts associated with the project (as assessed within the EIA), the following has been considered:

- » Potential ecological impacts;
- » Potential impacts on avifauna;
- » Potential impacts on heritage resources; and
- » Areas of visual impact.

The amendments are expected to have **no effect** on the findings of the Socio-economic Assessment undertaken as part of the EIA process. Therefore, no Socio-economic Specialist Report has been included within this Motivation Report. The potential for change in the significance and/or nature of impacts based on the proposed amendments, as described within this Motivation Report, is discussed below and detailed in the specialists' assessment addendum letters (as applicable) contained in **Appendix A-D**. This section of the main report must be read together with the specialists' addendum letters contained in **Appendix A - D** in order for the reader to obtain a complete understanding of the proposed amendments and the implications thereof.

### 5.1. Impacts on Ecology

The original Ecological Assessment was conducted by Nkurenkuru Ecology and Biodiversity (Pty) Ltd (Mr. Gerhard Botha – PrSciNat: Ecology and Botany) in November 2018. The entire project site (including all alternative site and corridor) was surveyed from the 29th to the 31st of October 2018 and survey conditions were regarded as acceptable to near optimal. As mentioned, the entire project site was surveyed and included all the alternative areas, and as such the areas now proposed for the new preferred grid route (Grid Alternative 2 corridor) and on-site substation were also thoroughly surveyed and described and assessed.

Consideration of the change in impact on fauna and flora associated with the proposed amendment was undertaken by Gerhard Botha of Nkurenkuru Ecology and Biodiversity (Pty) Ltd in April 2022. The findings of the assessment are detailed below (**Appendix A**).

#### 5.1.1. Comparative Assessment

- i. **Grid Line Corridor Amendment:** Amendments to existing listed impacts and/or the addition of new potential impacts based on the proposal of an extension of the assessed Grid Corridor Alternative 2.

Following a review of the Ecological Study and Impact Assessment conducted in 2018 as well as a thorough survey of the most recent available Google Earth Imagery, the following comments can be made regarding the above-mentioned impacts.

- » Even though, the proposed, preferred grid route will be slightly longer, the extent of the additional area as well as the present ecological condition/status of this additional area is of such a nature (small additional area, traversing mainly transformed areas), that a change in the significance of all assessed impacts is not warranted.
- » The same situation is applicable for the amendment to the on-site substation, where the amendment to the development footprint (slight reduction), is not significant enough to warrant any change in the significance of all assessed impacts.
- » Furthermore, the proposed amendments to the preferred grid corridor and the on-site substation footprint will not result in any additional impacts (impacts not mentioned or assessed within the "original" ecological impact assessment).
- » Subsequently the assessment of the impacts within the original report will remain unchanged and are still applicable.

As such no additional impact assessment or alteration to existing impact assessment was deemed necessary.

### **5.1.2. Conclusion and Recommendations**

The amendments are proposed within the authorised footprint of Lichtenburg 2 and 3 PV assessed within the EIA process. In addition, the extension request to the grid connection corridor for Lichtenburg 3 PV is proposed within an area that was assessed by Specialists during the EIA process.

Based on a comparison between recent satellite images (Google Earth Satellite Image from December 2021) and satellite images used during the Ecological Assessment (Google Earth Image from May 2018), land use practices remained the same (predominantly cattle grazing with a small area being cultivated to the south (on Portion 23 of the Farm Houthaaldoors No. 31 and the Remaining Extent of Portion 2 of the Farm Zamenkomst No. 4) with no clear change in vegetation structure and the present ecological status of the assessed area (Figure 4). As such the need for a site visit as part of the Part 2 Amendment was deemed unnecessary with the findings of the terrestrial and wetland/ecological study and assessment still regarded as applicable.

In conclusion, the proposed amendments will result in similar ecological impacts to those identified and assessed in the EIA. Subsequently, from an ecological perspective, no objection or motives (identification of impacts of high ecological significance etc.) were identified which would hinder the proposed amendment. Therefore, the proposed amendment is acceptable and may be authorised, subject to the implementation of the recommended mitigation measures provided within the original Ecological Impact Assessment (Botha, 2018).

### **5.2. Impacts on Avifauna**

The original Avifauna Assessment was conducted by of Pachnoda Consulting CC (Mr. Lukas Niemand) in 2018.

The baseline avian data was obtained from point count sampling techniques during two independent sampling sessions (July 2018 and October 2018). The objectives of the avifaunal study were to: (a) describe the avifauna associations in the project area according to species composition and richness prior to construction activities; (b) provide an inventory of bird species occurring in the project area including

species prone towards collisions with the proposed infrastructure; (c) provide an impact assessment; and (d) provide an indication of the occurrence of species of concern (e.g. threatened and near threatened species).

Five avifaunal habitat types were identified, and consisted of open mixed dolomite grassland with bush clump mosaics, artificial livestock watering points, arable/fallow land and power line pylons which were often used by vultures when roosting. Approximately 206 bird species are expected to occur in the wider study area, of which 100 species were observed in the area with 79 species confined to the study site (infrastructure footprint). The expected richness included 12 threatened or near threatened species, 15 southern African endemics and 21 near-endemic species. The critically endangered White-backed Vulture (*Gyps africanus*) was observed on the study site, although the endangered Cape Vulture (*G. coprotheres*), endangered Lappet-faced Vulture (*Torgos tracheliotos*) and near threatened Black-winged Pratincole (*Glareola nordmanni*) were confirmed from habitat adjacent to the study site. Seven southern African endemics and 10 near-endemic species were confirmed on the study site. In addition, a total of 48 collision-prone bird species have been recorded from the wider study area (*sensu atlas data*), of which 23 species were birds of prey.

The main impacts associated with the proposed PV solar facility includes the following:

- » The loss of habitat and subsequent displacement of bird species due to the ecological footprint required during construction.
- » Direct interaction (collision trauma) by birds with the surface infrastructure (photovoltaic panels) caused by polarised light pollution and/or colliding with the panels (as they are mistaken for waterbodies).
- » Collision with associated infrastructure (mainly overhead power lines).

An evaluation of potential and likely impacts on the avifauna revealed that the impact significance was low or moderate after mitigation (depending on the type of impact), with the exception of the potential for birds to collide with the associated power lines, which was high without mitigation (and moderate after mitigation). The study site is not located near any prominent wetland system or impoundment, and therefore the risk of waterbird collisions with the proposed infrastructure was considered to be low.

The endangered Cape Vulture (*Gyps coprotheres*), critically endangered White-backed Vulture (*Gyps africanus*) and Lappet-faced Vulture (*Torgos tracheliotos*) were identified as regular foraging visitors to the study site (according to SABAP2 reporting rates and on-site observations). These species are highly prone to power line collisions, whereby the proposed energy facility (especially the proposed overhead power lines) could pose a collision and electrocution risk to vultures. The risk of collision/electrocution was considered likely when vultures feed on a carcass in close proximity to a power line or when attempting to roost on the pylon structures (especially vultures visiting a nearby active vulture restaurant). However, with mitigation the risk of vultures colliding with the associated infrastructure could be reduced from a high to a medium significance. The findings of the assessment relating to the proposed amendment are detailed below (**Appendix B**).

### **5.2.1. Comparative Assessment**

All impacts as presented in the 2018 Avifaunal Report will remain unchanged during the implementation of the proposed amendments, which will have no change in the overall impact significance. In addition, the Collector Substation Complex (on Lichtenburg 3 PV) will be located on habitat with a low avifaunal sensitivity

(c. agricultural land) and will cover a small surface area, which will result in a low impact significance rating (when compared to the PV layout).

The Alternative 2 Grid Connection Corridor is located alongside existing power line servitudes (in contrast to a section of Alternative Grid Connection 3 which deviated from the existing powerline servitudes), and the advantage of the Alternative 2 Grid Connection Corridor is that its placement along existing power lines will greatly increase the visibility of the overhead cables to passing birds (during daylight), thereby reducing avian collision with the overhead cabling structures. Therefore, the impact of avian collisions at the Alternative 2 Grid Connection Corridor is predicted to be lower when compared to Alternative Grid Connection 3 (refer to the 2018 Avifaunal Report).

Nevertheless, it is recommended that all the proposed mitigation measures and EMPr actions be rigorously implemented as stipulated in the 2018 Avifaunal Report. However, it is further recommended that all artificial livestock watering points that are to be spanned by overhead powerline corridors be relocated/removed to prevent potential bird collisions (e.g. when birds congregate at the watering holes in an attempt to drink/ingest water or when birds of prey are hunting prey attracted to the water resource).

### **5.2.2. Conclusion and Recommendation**

The proposed amendments will not result in a change in impacts on avifauna as predicted in the EIA. No additional mitigation measures are recommended as a result of the proposed amendments. Therefore, the proposed amendment is acceptable and may be authorised, subject to the implementation of the recommended mitigation measures provided within the original Ecological Impact Assessment.

### **5.3. Impacts on Heritage Resources**

An Archaeological Field Assessment was conducted for the Lichtenburg PV Facilities by Cedar Tower Services (CTS) in 2019. The physical survey focused on the areas proposed for Lichtenburg 2 PV Facility and included the area proposed for the proposed amendments. The field assessment noted that the area has been disturbed and transformed by agricultural activities. As such pre-existing agricultural plough fields, grazing areas and farm buildings were identified in the development area. Furthermore, throughout the farming areas, several heaps of rocks that were removed from the agricultural fields were identified. During the field assessment of the site no archaeological resources, graves or burial grounds were identified in the project area. However, graves are subterranean in nature and might not have been identified during the initial site visit and survey. However, it is very unlikely that the proposed amendments will negatively impact on significant archaeological or built environment heritage.

#### **Palaeontology**

The proposed development is located on geological deposits belonging to the Monte Christo Formation of the Chuniespoort Group. The Monte Christo Formation is within the Malmani Subgroup. These deposits have a very high sensitivity for impacts to palaeontological resources. This group is known to contain a range of shallow marine to intertidal stromatolites (domes, columns etc) and organic-walled microfossils. In addition, it is within this group that fossiliferous Late Cenozoic cave breccias have been identified such as within the Cradle of Humankind region. The area under consideration in this assessment was surveyed on foot by Bamford et al. (2019) as part of the Heritage Impact Assessment completed for the Lichtenburg 2 PV facility in 2019.

According to Bamford (2019), the project area lies on rocks of the Malmani Subgroup, Chuniespoort Group. The Malmani Subgroup is up to 2000m thick and comprises five formations distinguished by the amount of chert, stromatolite morphology, intercalated shales and erosion surfaces (Eriksson et al., 2006). The basal Oaktree Formation overlies the Black Reef Formation, and is made up of carbonaceous shales, stromatolitic dolomites and locally developed quartzites. Above this is the Monte Christo Formation comprising erosive breccia, overlain by stromatolitic and oolitic platformal dolomites. Next is the Lyttleton Formation of shales quartzites and stromatolitic dolomites. The Eccles Formation comprises a series of erosional breccias and the overlying Frisco Formation is made up mostly of stromatolitic dolomites.

The site proposed for development is in the Malmani Subgroup which contains a number of stromatolitic dolomites. These were formed in warm shallow sea and are the accumulation of layer upon layer of minerals deposited by blue-green algae (also known as cyanobacteria) and rarely some filamentous algae. Minerals deposited by the algae include calcium carbonate, calcium sulphate and magnesium carbonate. Very rarely are the algal cells preserved in the stromatolites and these are microscopic. Stromatolites are essentially trace fossils and these ones are 2750 to 2650 million years old and very abundant. Based on the nature of the project, surface activities may impact the fossil heritage if preserved in the development footprint. The geological structures suggest that the rocks are much too old to contain fossils other than blue-green algae. Taking account of the defined criteria, the potential impact on fossil heritage resources is negligible to extremely low. As such, the proposed amendments are unlikely to negatively impact significant palaeontological heritage resources.

The findings of the assessment of the proposed amendments are detailed below (**Appendix C**). Additional mitigation measures proposed are underlined for ease of reference.

### 5.3.1. Comparative Assessment

<b>Nature:</b> <u>Impacts on archaeological resources</u>				
The construction phase of the project will require excavation, which may impact on heritage resources if present. No heritage resources of significance were identified during the field assessments for archaeology.				
	Authorised Sites		Proposed Amendments	
	Without mitigation	With mitigation	Without mitigation	With mitigation
<b>Extent</b>	Localised within the site boundary (1)	Not applicable as no impacts are anticipated	Localised within the site boundary (1)	Localised within the site boundary (1)
<b>Duration</b>	Where an impact to a resource occurs, the impact will be permanent (5)		Where manifest, the impact will be permanent (5)	Where manifest, the impact will be permanent(5)
<b>Magnitude</b>	Low as no archaeological resources were identified (2)		No significant heritage resources were identified within the proposed development and	No significant heritage resources were identified within the proposed development and no negative impact



			no negative impact is anticipated from the proposed amendments (1).	is anticipated from the proposed amendments. (1)
<b>Probability</b>	It is extremely unlikely that any significant archaeological resources will be impacted (1)		Probability is low (1)	Probability is low (1)
<b>Significance</b>	<b>Low (8)</b>		<b>Low (7)</b>	<b>Low (7)</b>
<b>Status (positive or negative)</b>	Neutral		Neutral	
<b>Reversibility</b>	Any impacts to heritage resources that do occur are irreversible		Any impacts to heritage resources that do occur are irreversible	Any impacts to heritage resources that do occur are irreversible
<b>Irreplaceable loss of resources?</b>	Unlikely		Unlikely	
<b>Can impacts be mitigated?</b>	Not applicable as no impacts are anticipated		Yes	Yes
<b>Mitigation:</b>				
» No impacts on archaeological resources are anticipated and therefore no mitigation is required. However, a chance find procedure must be developed and implemented for the project in the event that an archaeological resource is found.				
<b>Residual Impacts:</b>				
» Should any significant resources be impacted (however unlikely) residual impacts may occur, including a negative impact due to the loss of potentially scientific cultural resources.				
» <u>If concentrations of archaeological heritage material and human remains are uncovered during construction, all work must cease immediately and be reported to the South African Heritage Resources Agency (SAHRA) (021 642 4502) so that systematic and professional investigation/ excavation can be undertaken.</u>				

**Nature:** Impacts on palaeontological resources

The construction phase of the project will require excavation, which may impact on heritage resources if present. No heritage resources of significance were identified during the field assessments for palaeontology.

	Authorised Sites		Proposed Amendments	
	Without mitigation	With mitigation	Without mitigation	With mitigation
<b>Extent</b>	Since only the possible fossils within the area would be microscopic blue-green algae in some stromatolites, the spatial scale will be localised within the site boundary (1)	Not applicable as no impacts are anticipated	Localised within the site boundary (1)	Localised within the site boundary (1)

<b>Duration</b>	Where an impact to a resources occurs, the impact will be permanent (5)		Where manifest, the impact will be permanent (5)	Where manifest, the impact will be permanent (5)
<b>Magnitude</b>	Loose sands do not preserve plant fossils; stromatolites are common trace fossils and not considered paleontologically important in this age deposit. They outcrop sporadically. The impact would be very unlikely (2)		According to the PIA conducted for the Lichtenburg PV Facility, "The geological structures suggest that the rocks are much too old to contain fossils other than blue-green algae. Taking account of the defined criteria, the potential impact to fossil heritage resources is negligible to extremely low." As such, the proposed amendments are unlikely to negatively impact significant palaeontological heritage resource(L)	According to the PIA conducted for the Lichtenburg PV Facility, "The geological structures suggest that the rocks are much too old to contain fossils other than blue-green algae. Taking account of the defined criteria, the potential impact to fossil heritage resources is negligible to extremely low." As such, the proposed amendments are unlikely to negatively impact significant palaeontological heritage resource (L)
<b>Probability</b>	It is extremely unlikely that any fossils would be found in the stromatolites which are themselves common trace fossils (1)		Probability is low (1)	Probability is low (1)
<b>Significance</b>	<b>Low (8)</b>		<b>Low (7)</b>	<b>Low (7)</b>
<b>Status (positive or negative)</b>	Neutral		Neutral	
<b>Reversibility</b>	Any impacts to heritage resources that do occur are irreversible			

<b>Irreplaceable loss of resources?</b>	Unlikely	Unlikely
<b>Can impacts be mitigated?</b>	Not applicable as no impacts are anticipated	Yes
<b>Mitigation:</b> No impacts on palaeontological resources are anticipated and therefore no mitigation is required. However, a chance find procedure must be developed and implemented for the project in the event that a palaeontological resource is found.		
<b>Residual Impacts:</b> » Should any significant resources be impacted (however unlikely) residual impacts may occur, including a negative impact due to the loss of potentially scientific cultural resources. » <u>If concentrations of archaeological heritage material and human remains are uncovered during construction, all work must cease immediately and be reported to the South African Heritage Resources Agency (SAHRA) (021 642 4502) so that systematic and professional investigation/ excavation can be undertaken.</u>		

### 5.3.2. Conclusion and Recommendation

There is no objection to the proposed amendments to the Lichtenburg 2 PV on heritage grounds and no monitoring protocols are recommended. There are no disadvantages or advantages associated with the proposed amendment from a heritage perspective however, it should be noted that, although there were no other archaeological or heritage resources identified during the survey conducted for the already approved PV facility; some archaeological material, including artefacts and graves, can be buried underground and as such, may not have been identified during the initial survey and site visits. In the case where the proposed development activities bring these materials to the surface, work must cease and SAHRA must be contacted immediately to determine a way forward. The following findings have been made: No archaeological resources were identified in the project area identified for the proposed amendments.

- » No archaeological resources were identified in the project area identified for the proposed amendments.
- » No graves or burial grounds were identified in the project area identified for the proposed amendments. However, graves are subterranean in nature and might not have been identified during the initial site visit and survey.
- » Based on the experience of the palaeontologist and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the stromatolites or overlying soils of the Quaternary.
- » If concentrations of archaeological heritage material and human remains are uncovered during construction, all work must cease immediately and be reported to the South African Heritage Resources Agency (SAHRA) (021 642 4502) so that systematic and professional investigation/ excavation can be undertaken.

### 5.4. Visual Impacts

A visual assessment addendum letter was compiled by LOGIS (**Appendix D**) to evaluate the visual impacts associated with the proposed amendment. The findings of the assessment are detailed below, including the measures to ensure avoidance, management, and mitigation.

#### **5.4.1. Comparative Assessment**

The proposed amendment is not expected to significantly alter the influence of the project infrastructure on areas of higher viewer incidence (observers travelling along the roads within the region) or potential sensitive visual receptors (residents of homesteads in close proximity to the PV facility).

The proposed amendment is consequently not expected to significantly influence the anticipated visual impact, as stated in the original VIA report (i.e. the visual impact is expected to occur regardless of the amendment). This statement relates specifically to the assessment of the visual impact within a 1km radius of the project structures (potentially high significance), but also generally apply to potentially moderate to low visual impacts at distances of up to 3km from the structures.

In consideration of the proposed amendment, there is no (zero) change to the significance rating compared with the original EIA VIA report and no additional visual impacts are envisaged. In addition to this, no new mitigation measures are required.

#### **5.4.2. Conclusion and Recommendations**

The proposed amendment is expected to have a neutral effect from a visual impact perspective i.e. no advantages or disadvantages are expected.

It is suggested that the proposed amendment be supported, subject to the conditions and recommendations as stipulated in the original EA, and according to the Environmental Management Programme (EMPr) and suggested mitigation measures, as provided in the original VIA report.

#### **5.5. Changes to the EMPr**

It is noted that condition 13 of the EA states that the EMPr has been approved. Based on the amendments proposed the EMPr and Layout will be amended and submitted to the Department for approval once a decision on this Part 2 amendment has been made by the Department.

## 6. ADVANTAGES AND DISADVANTAGES OF THE PROPOSED AMENDMENTS

In terms of Regulation 32(1)(a)(ii), this section provides details of the advantages and disadvantages of the proposed amendment.

Advantages of the amendment	Disadvantages of the amendment
<b>General</b>	
The proposed amendment will allow connection of Lichtenburg 2 PV to the proposed collector substation of ABO Wind Lichtenburg 3 PV on the authorised footprint of Lichtenburg 3 PV. This is in accordance with Eskom's requirements.	None
<b>Ecology</b>	
None	The newly proposed and preferred grid route (Grid Corridor Alternative 2 with a slight amendment/extension) will be slightly longer than the originally assessed Grid Alternative 2 route; however, the infrastructure will be located within an area assessed by the Specialists during the EIA process.
<b>Avifauna</b>	
The Alternative 2 Grid Connection Corridor will be located adjacent to existing power lines which will greatly increase the visibility of the overhead cables to passing birds (during daylight), thereby reducing avian collision with the overhead cabling structures.	None
<b>Heritage</b>	
None	None
<b>Visual</b>	
None	None

Based on the above, it can be concluded that the advantages of the proposed change outweigh the disadvantages from an environmental and technical perspective.

## **7. REQUIREMENTS FOR ADDITIONAL MITIGATION AS A RESULT OF THE PROPOSED AMENDMENTS**

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As required in terms of Regulation 32(1)(a)(iii), consideration was given to the requirement for additional measures to ensure avoidance, management and mitigation of impacts associated with the proposed change. From the specialist inputs provided into this amendment motivation, it is concluded that the mitigation measures proposed within the EMPr would be sufficient to manage potential impacts within acceptable levels.

The Avifaunal Assessment included the following additional recommendation:

- » All artificial livestock watering points that are to be spanned by overhead powerline corridor must be relocated/removed to prevent potential bird collisions (e.g. when birds congregate at the watering holes in an attempt to drink/ingest water or when birds of prey are hunting prey attracted to the water resource).

No additional mitigation measures were proposed by the Ecology, Heritage and Visual specialists as a result of the proposed amendments.

## 8. PUBLIC PARTICIPATION

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A public participation process has been conducted in support of the Part 2 application for amendment of the EA for the development of the 100MW Lichtenburg 2 PV Facility and its associated infrastructure near Lichtenburg, North West Province.

A full I&AP database is included in **Appendix E1**. It must be noted that the project is to be developed on the same farm portions as originally authorised, all of which, are privately owned. The affected landowners were informed of the part 2 amendment process. The amendment to the EA will not result in impacts on any additional I&APs.

The public participation for the proposed amendment process included:

- » The Draft Motivation Report has been made available to registered I&APs on the Savannah Environmental Website (<https://savannahsa.com/public-documents/energy/>) for a 30-day review and comment period from **Thursday, 14 April 2022 to Thursday, 19 May 2022.**
- » Written notification to registered I&APs (refer to **Appendix E2**) and Organs of State (refer to **Appendix E3**) regarding the availability of the Draft Motivation Report was sent on **Thursday, 14 April 2022.**
- » Advertisements were placed in **Die Noordwester Newspaper** on **Thursday, 14 April 2022** (refer to **Appendix E4**).
- » Site notices were placed at the site on **Thursday, 14 April 2022.**

Comments received during the public review period will be included in the final submission to the DFFE for consideration in the decision-making process. Comments will be included and responded to in the Comments and Responses Report included in the final Motivation Report submission<sup>2</sup>.

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<sup>2</sup> Contact details of I&APS are not included due to POPIA requirements.

## 9. CONCLUSION

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Based on the specialist findings, it is concluded that the proposed amendments to the environmental authorisation are not expected to result in an increase to the significance ratings for the identified potential impacts. Specific findings were issued by the respective specialists, and are summarised below:

- » The **Ecological** specialist found that the proposed amendments will result in similar ecological impacts. Subsequently, from an ecological perspective no objective or motives (identification of impacts of high ecological significance etc.) were identified which would hinder the proposed amendment. Therefore, the proposed amendment is acceptable and may be authorised, subject to the implementation of the recommended mitigation measures provided within the original Ecological Impact Assessment (Botha, 2018).
- » The **Avifaunal** specialist found that all impacts as presented in the 2018 Avifaunal Report will remain unchanged with the implementation of the proposed amendments, which will have no change in the overall impact significance. Therefore, the proposed amendment is acceptable and may be authorised, subject to the implementation of the recommended mitigation measures provided within the original Avifaunal Impact Assessment.
- » The **Heritage** specialist noted that no that the area has been disturbed and transformed by agricultural activities. As such pre-existing agricultural plough fields, grazing areas and farm buildings were identified in the development area. Furthermore, throughout the farming areas, several heaps of rocks that were removed from the agricultural fields were identified. During the field assessment of the site no archaeological resources, graves or burial grounds were identified in the project area. However, graves are subterranean in nature and might not have been identified during the initial site visit and survey. However, it is very unlikely that the proposed amendments will negatively impact on significant archaeological or built environment heritage. Based on the nature of the project, surface activities may impact upon the fossil heritage if preserved in the development footprint. The geological structures suggest that the rocks are much too old to contain fossils other than blue-green algae. Taking account of the defined criteria, the potential impact to on fossil heritage resources is negligible to extremely low. As such, the proposed amendments are unlikely to negatively impact significant palaeontological heritage resources.
- » The **Visual** specialist indicated that the proposed amendment is not expected to significantly alter the influence of the project infrastructure on areas of higher viewer incidence (observers travelling along the roads within the region) or potential sensitive visual receptors (residents of homesteads in close proximity to the PV facility). The proposed amendment is consequently not expected to significantly influence the anticipated visual impact, as stated in the original VIA report (i.e. the visual impact is expected to occur regardless of the amendment). This statement relates specifically to the assessment of the visual impact within a 1km radius of the project structures (potentially high significance), but also generally apply to potentially moderate to low visual impacts at distances of up to 3km from the structures. In consideration of the proposed amendment, there is no (zero) change to the significance rating compared with the original EIA VIA report and no additional visual impacts are envisaged. In addition to this, no new mitigation measures are required. The proposed amendment is expected to have a neutral effect from a visual impact perspective i.e. no advantages or disadvantages are expected.

All specialists therefore concluded that the amendments proposed are considered acceptable from their respective specialisation and that the proposed amendment be supported subject to the conditions and



recommendations as stipulated in the EA and according to the EMPr and suggested mitigation measures, as provided in the original specialist's assessments reports.

### 9.1. Overall Conclusion and Recommendations

The amendments proposed do not constitute any listed activities. The mitigation measures described in the original BA document are adequate to manage the expected impacts for the project. No additional mitigation measures are provided by the specialists except the additional mitigation proposed by the heritage specialists.

Given the above, ABO requests the following amendments as part of this application:

- » Amendment of the preferred power line corridor to allow connection of Lichtenburg 2 PV to the Collector Substation Complex at Lichtenburg 3 PV.
- » A change in the capacity of the step-up/on-site substation from 88/132kV to 33/132kV;
- » a substitution of the wording in the EA, 'a new 132kV overhead power line from the on-site substation to the Mmabatho/Watershed DS 1 88kV power line', with, 'a new 132kV power line from Lichtenburg 2 PV's step-up/on-site substation to a proposed collector substation complex on Lichtenburg 3 PV'.

Taking into consideration the conclusions of the studies undertaken for the proposed amendments (as detailed in **(Appendix A–D)**), it is the opinion of the EAP that these amendments are considered acceptable from an environmental perspective, provided that the original mitigation measures stipulated herein are implemented.

