

VENTURA RENEWABLE ENERGY (PTY) LTD

PROPOSED VISSERSPAN SOLAR PV FACILITY - PROJECT 3

*on Visserspan Farm No. 40, near Dealesville,
Tokologo Local Municipality, Free State Province*



DRAFT BASIC ASSESSMENT REPORT

*in terms of the National Environmental Management Act, No. 107 of 1998 (as amended)
and associated environmental impact assessment regulations, 2014*

(VOLUME 1 OF 2)

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PREPARED FOR:

Ventura Renewable Energy (Pty) Ltd

20 Victoria Link

Route 21 Corporate Park

Irene

Pretoria

0157

Tel.: +27 82 631 7496

Fax.: +27 86 267 6181

PREPARED BY:

EnviroAfrica CC

P.O. Box 5367

Helderberg

7135

Tel: +27 21 851 1616

Fax: +27 86 512 0154

EXECUTIVE SUMMARY

EnviroAfrica CC has been appointed by Ventura Renewable Energy (Pty) Ltd, to undertake the environmental impact assessment (EIA) application process for the development of a solar photovoltaic (PV) array on the Farm Visserspan No. 40, approximately 10km northwest of Dealesville and 68km northwest of Bloemfontein, in the Free State Province.

As part of the application for an environmental authorisation (EA), a basic assessment report (BAR) is required since, although the proposed development is for a large scale solar PV facility capable of generating of more than 20MW but less than 100MW of electricity, which would have normally required a scoping and full environmental impact report, the proposed development falls within renewable energy development zone 5 (REDZ 5) and therefore, GN. 350 of 2017 applies. Accompanying this draft basic assessment report (DBAR) is Ventura Renewable Energy (Pty) Ltd's (Ventura's) application for environmental authorisation

It is proposed that the development footprint for Visserspan Solar PV Facility - Project 3, cover an area of around 222ha, circumscribed with a perimeter fire access road and fence. The PV tables will face north and will be raised approximately 500mm above ground level at their lower level and will not exceed a height of 3m when at full tilt (upper level). The PV tables will have single axis tracking systems allowing the generation of not more than 100MW of alternating current.

The infrastructure associated with the proposed solar PV array includes a fenced construction staging area, maintenance shed/s, inverter-transformer stations on concrete pads and office buildings all within the 222ha proposed development site footprint, as well as a switch panel and an overhead powerline from the PV array for connection to the power grid, at Eskom's Perseus substation, south of the proposed development site.

The National Environmental Management Act, No.107 of 1998 (NEMA), as amended, makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the competent authority based on the findings of an Environmental Assessment.

NEMA as a national act, is enforced by the national Department of Environment, Forestry and Fisheries (DEFF). Typically, these powers are delegated to the provincial department

of environmental affairs but since the legislated (or listed) activity which results from the proposed development, occurs in an area of strategic importance identified in terms of Section 24(3) of NEMA, namely in a Renewable Energy Development Zone (REDZ) and associated strategic transmission corridor, DEFF is the competent authority for this environmental authorisation application.

According to the regulations of Section 24(5) of the NEMA, environmental authorisation is required for certain regulated or listed activities. The schedules of listed activities under the NEMA were evaluated to determine which actual and possible activities required authorisation. Several actual and potential listed activities, as per the 2014 EIA regulations (as amended), apply to the proposed Visserspan Solar PV Facility development. These activities are detailed in Section 6 of this basic assessment report (BAR).

It should be noted that due to the consent use of land (as per Appendix K) and the proximity to Eskom's Perseus substation, as well as the other renewable energy developments/proposed developments, alternative sites do not exist. However, alternative options which include *inter alia* alternative PV technology, layout options and the option of not proceeding with the proposed development at all (the No-Go option) are considered within this DBAR. Specialist reports (draft versions) are referenced and appended to this DBAR and will, together with this BAR be refined further, if necessary, as more detailed information becomes available.

The findings, results, observations and recommendations given in this assessment are based on the best scientific and professional knowledge available from information provided and verified by site visits.

A brief synopsis of the main opinion of each of the seven specialists appointed to assess various parameters of the project is presented below:

Botanical / Biodiversity:

The dominant vegetation type found on Visserspan Farm No. 40 is Vaal-Vet Sandy Grassland, an endangered (A1) vegetation type (Government Gazette, 2011). The proposed development would result in a high local loss of this vegetation type (habitat) and loss of ecological functionality. Mitigation options are minimal to zero and the impact at a local scale is thus **High Negative**. However, since the Vaal-Vet Sandy Grassland is an extensive system and not confined to Visserspan, the cumulative impact would be **Low**

Negative and loss of resources would be low, particularly when considering the grazing and other pressures the land is subject to. Consequently, the development of the Solar PV Project 3 at Visserspan is supported from a botanical (vegetation) perspective.

At the outset, certain areas were identified as a 'no-go' areas viz. the farmhouse and surrounding buildings, any wetland - particularly the pans - on site (32m setback factored into the no-go area).

Owing to the widespread occurrence of the principal vegetation type, Vaal-Vet Sandy Grassland, the botanical specialist holds the view that Vaal-Vet Sandy Grassland is not sensitive at Visserspan. The classification of areas as critical biodiversity areas (CBAs) and ecological support areas (ESAs) on the farm was also questioned and it was stated that the ESAs and degraded areas are incorrectly mapped.

Freshwater:

There are no watercourses on or within 32m of the proposed development site for Visserspan Solar PV Facility – Project 3. This was confirmed by the freshwater specialist study which was undertaken for the entire Visserspan Farm No. 40 as per Appendix G2.

However, areas of freshwater importance due to the presence of wetlands (pans) on other parts of the farm, were identified as no-go areas, with a 32m setback provided for from these wetlands/watercourses. Therefore, while no NEMA listed activities are triggered by the presence of these watercourses, they are considered National Freshwater Ecosystem Priority Areas (NFEPAs) and in terms of the National Water Act No. 36 of 1998 (NWA) authorisation from the Department of Water and Sanitation (DWS) is required for development to take place within 500m of a wetland.

Stormwater runoff from Project 3 will flow into the central mixed grass pan and some of the runoff will flow towards the micro-pan

Heritage:

Archaeological:

According to the specialist archaeological impact assessment (as per Appendix G3a), no archaeological resources were recorded in the proposed development footprint area for Visserspan Solar PV Facility – Project 3.

In terms of the total Visserspan Farm property, the archaeological impact assessment further states that, “archaeological resources have been rated as having LOW (Grade IVC) significance since, generally, relatively small numbers of archaeological remains were found in other areas of the farm (not part of Project 3’s site) and were isolated and were found in a disturbed context.

No evidence of any Late Iron Age archaeological heritage was noted during the field assessment, which appears to be absent from the study area.

No evidence of any Anglo-Boer War battlefield sites (1899-1904), war graves or memorials were encountered during the study”.

Palaeontological:

According to the specialist palaeontological impact assessment report attached as Appendix G3b, it was “concluded that the palaeontological sensitivity of the solar PV project area on Farm Visserspan No. 40 near Dealesville is low. Anticipated impacts on local palaeontological heritage resources from the construction phase of the developments are accordingly also of LOW SIGNIFICANCE.

This applies equally to all four of the proposed solar PV facilities whose cumulative impact significance would also be LOW.

No further significant impacts are expected during the operational and decommissioning phases of the developments.

There are no fatal flaws in the development proposals”.

The palaeontological specialist further states that provided that the recommended mitigation measures as detailed in the Palaeontological Impact Assessment Report (as per Appendix G3b) are fully implemented, there are no objections on palaeontological heritage grounds to authorisation of the proposed Visserspan Solar PV Facility.

Visual:

An assessment of the potential visual receptors through the use of landscape profiles coupled with on-site verification was undertaken.

The term visual and aesthetic is defined to cover the broad range of visual, scenic, cultural, and spiritual aspects of the landscape. It also includes the impact on 'sense of place' of the area.

The visual receptors in the area are of medium to low sensitivity. The assessment finds that the overall visual impact of the proposed Project 3 of the Visserspan PV facility holds a low overall visual impact. For this reason, no mitigation measures are required.

Sarien Lategan was appointed to undertake the visual impact assessment for the Visserspan PV Facility, Project 3, near Dealesville, Free State.

Due to the fact that a number of PV facilities have been approved to the south of Project 3, the project does contribute to the cumulative impact specifically to spatial crowding. The pro rate contribution to the overall number of approved projects is however low. Since no thresholds have been determined on a regional level it is not appropriate to assess the impact on landscape change.

Soil, Land Use and Agricultural Potential Impact Assessment:

Due to the soil properties, land use for the type of land found on the proposed development site, is extensive grazing. This is also due to climatic constraints.

According to the specialist, *"land capability mimics the land use" and "the agricultural potential in terms of dryland cropping is low due to lower than 500 mm rainfall per annum, with grazing potential being dependent on rainfall and management"*.

It was concluded by the specialist that *"the proposed development of a photovoltaic facility on the site will not have large impacts due to the low agricultural potential of the site as well as the rainfall that is below 500 mm pa."*

Socio-economic:

The specialist has indicated *"no strong opinion, from a socio-economic point of view, as to whether the Visserspan solar PV projects should be permitted, either singly or together"* but notes positive and negative factors regarding the Visserspan Solar PV Project.

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1. ACRONYMS

BAR	Basic Assessment Report
BGIS	National Biodiversity Geographic Information System
CAA	Civil Aviation Act, No. 13 of 2009
CBA	Critical Biodiversity Area
DBAR	Draft Basic Assessment Report
DEA	Department of Environmental Affairs
DESTEA	Department of Economic, Small Business Development, Tourism and Environmental Affairs
DoH	Department of Health
DWS	Department of Water and Sanitation
EAP	Environmental Assessment Practitioner
ECA	Environment Conservation Act, No. 73 of 1989
EIA	Environmental Impact Assessment
EIR	Environmental Impact Report
EMF	Electromagnetic Field
EMPr	Environmental Management Programme
ESA	Ecological Support Area
HIA	Heritage Impact Assessment
HWC	Heritage Western Cape
ICASA	Independent Communications Authority of South Africa
ICASAA	Independent Communications Authority of South Africa Act, No. 13 of 2000 (and regulations as amended by the Broadcasting Amendment Act, No. 64 of 2002)
ICT	Information and Communications Technology
I&APs	Interested and Affected Parties
MNO	Mobile Network Operators
NEMA	National Environmental Management Act, No. 107 of 1998 (and as amended)
NEM:AQA	National Environmental Management: Air Quality Act, No. 39 of 2004 (and as amended)
NEM:BA	National Environmental Management: Biodiversity Act, No. 10 of 2004 (and as amended)

NEM: PAA	National Environmental Management: Protected Areas Act, No. 57 of 2003 (and as amended)
NEM:PAAA	National Environmental Management: Protected Areas Amendment Act, No. 15 of 2009
NEM:WA	National Environmental Management: Waste Act, No. 59 of 2008 (and as amended)
NHRA	National Heritage Resources Act, No. 25 of 1999 (and as amended)
NRA	National Roads Act, No. 7 of 1998
NWA	National Water Act, No. 36 of 1998 (and as amended)
SACAA	South African Civil Aviation Authority
SAHRA	South African Heritage Resources Agency
SANBI	South African National Biodiversity Institute
SANRAL	South African National Road Agency (Pty) Ltd
SANRAL	The South African National Roads Agency Limited
SIP	Strategic Integrated Project
WHO	World Health Organisation
WULA	Water Use Licence Application

2. TERMS OF REFERENCE

EnviroAfrica CC is an independent environmental consulting firm that has no interest in the proposed activity other than fair remuneration for services rendered. Remuneration for services is not linked to approval by decision making authorities and EnviroAfrica has no vested interest in secondary or subsequent development which may result from this project. There are no circumstances that compromise the objectivity of this environmental impact assessment.

The Applicant, Ventura Renewable Energy (Pty) Ltd, appointed EnviroAfrica CC on 21 October 2019 to facilitate the environmental impact assessment and authorisation application/s associated with the proposed development.

It should be noted that Ventura Renewable Energy (Pty) Ltd intends to develop four separate solar PV facilities on the Farm Visserspan No. 40. Each facility will generate between 75MW and not more than approximately 100MW. Environmental authorisation applications will be made for each proposed facility separately and each facility will be bid in the next REIPPPP bidding process but it is not certain which of the four, or if all four proposed facilities, will actually be successful and consequently, constructed.

The findings, results, observations and recommendations given here are based on the best scientific and professional knowledge available from information provided and verified, where required, by site visits.

EnviroAfrica reserves the right to modify aspects of this report, including the recommendations, if new information becomes available which may have a significant impact on the findings of this report.

This report was compiled by Vivienne Thomson on behalf of EnviroAfrica CC.

3. EAP QUALIFICATIONS

Vivienne Thomson: Vivienne holds a BSc in Zoology from the University of Cape Town (1995) and has over twenty years industry experience in the construction, power generation and mining sectors. She has completed an ISO 14001 Lead Auditors course, as well as several environmental short courses and has guest lectured for the MSc in Environmental Science Environmental Impact Assessment (EIA) course at the University of the Witwatersrand.

Vivienne is a member of the National Association for Clean Air (NACA) and has served as NACA National Council Member. She is a previous member of the South African Coal Ash Association and an affiliate of the Institute of Innovators and Inventors. She was also a member of the Committee of Interested Parties which acted as an independent, advisory body to ensure impartiality of Pricewaterhouse Coopers' Certification Body in their governance and sustainability division.

Since 2004, Vivienne has been involved in environmental consulting with experience in EIAs, establishing and implementing ISO 14001 EMSs, contract management, legal compliance evaluations, as well as developing, implementing and assessing environmental management plans and monitoring programmes.

Qualifications Summary: BSc, Zoology (UCT); EIA short course (PU), Environmental Law (PU), Advanced Environmental Law (Mandela Institute School of Law, Wits), ISO 14001 Lead Auditors Course (WTH Management and Training), Root Cause Analysis Technique (IRCA), Environmental Performance Measurement Workshop (African Centre for Energy and Environment), Basic Principles of Ecological Rehabilitation and Mine Closure (PU), Member: National Association for Clean Air

EnviroAfrica CC Owner: Bernard de Witt

Bernard de Witt Qualifications Summary: BSc, Forestry (SU); BA (Hons), Public Administration (Stellenbosch); National Diploma in Parks and Recreation Management; EIA Short course (UCT); ISO 14001 Auditors course (SABS); IAIA (SA) Membership Number: 219

Please refer to Appendix L (EAP Details and Declaration)

4. INTRODUCTION

4.1.1. Project Rationale

In March 2011, the Department of Energy's (DoE's) Integrated Resource Plan (IRP) 2010-2030 was promulgated with the aim of providing a long-term, cost-effective strategy to meet the electricity demand in South Africa. The IRP 2010-2030 objectives align with Government's in terms of reliable electricity supply, as well as environmental and social responsibilities and economic policies. The study horizon for the IRP was the period from 2010 to 2030.

The short to medium term intentions of the IRP 2010 -2030 are to ascertain the most cost-effective electricity supply option for the country, speak to the opportunities for investment into new power generation projects and determine security of electricity supply.

The IRP's long-term electricity planning goal is to consider social, technical, environmental and economic constraints, as well as other externalities while ensuring sustainable development in the country.

To this end, within the IRP, the DoE set a target electricity supply of 17.8 GW from renewable energy sources by 2030. This target renewable energy capacity would be produced primarily by solar, wind, biomass and small-scale hydro electricity generation (with the bulk being met by wind and solar energy supplies). In addition, the 2030 target ensures that approximately 42% of the country's total estimated electricity generation capacity would be met by renewable energy sources. This application is in response to the DoE's target and IRP 2010-2030 strategy to expand the South African renewable energy electricity generation capacity.

Activity Overview

The project is the establishment of an array of crystalline solar photovoltaic (PV) modules grouped into tables or panels of 20 modules each, together with associated infrastructure for the generation of between 75MW to approximately 100MW of electricity. The PV tables for Visserspan Solar PV Facility - Project 3 would form an array covering an area of not more than 222ha, surrounded by a perimeter fire access road and fence. This development footprint does not include evacuation powerlines and substation/s external to the 222ha site which will be dealt with in a separate environmental authorisation application.

The PV tables will be raised approximately 500mm above ground level and have single axis tracking systems allowing maximisation of solar energy harvesting for conversion to electrical energy. Similar solar PV arrays are depicted in Figure 1 below.



Figure 1: Single axis solar PV module tables raised 500mm above ground level (to a maximum tilt height of 3m).

Proposed associated infrastructure includes a fenced construction staging area, a maintenance shed, inverter-transformer stations on concrete pads, office buildings and maintenance shed/s, a switch panel for connection to the power grid, all within the 222ha site. It is proposed that the powerlines within the facility, as well as the approximately 22kV powerline/s used for evacuation of electricity from the solar PV facility to connect or tie the proposed development in to Eskom's larger kilovolt powerlines feeding into Perseus substation, be underground/sub-surface up until the point of tie-in to the national grid. Eskom's Perseus substation is located about 7km south-east of the proposed development site, as the crow flies but the length of the evacuation/tie-in power line (following the predetermined routes as negotiated with Eskom and landowners must still be finalised.

Figure 2 below indicates the position of the proposed Visserspan Solar PV Facility - Project 3, relative to other proposed solar PV arrays on the Farm Visserspan (cumulative depiction should all the Visserspan Project be authorised and developed), as well as array relative to Eskom's existing high voltage power lines and Perseus substation.

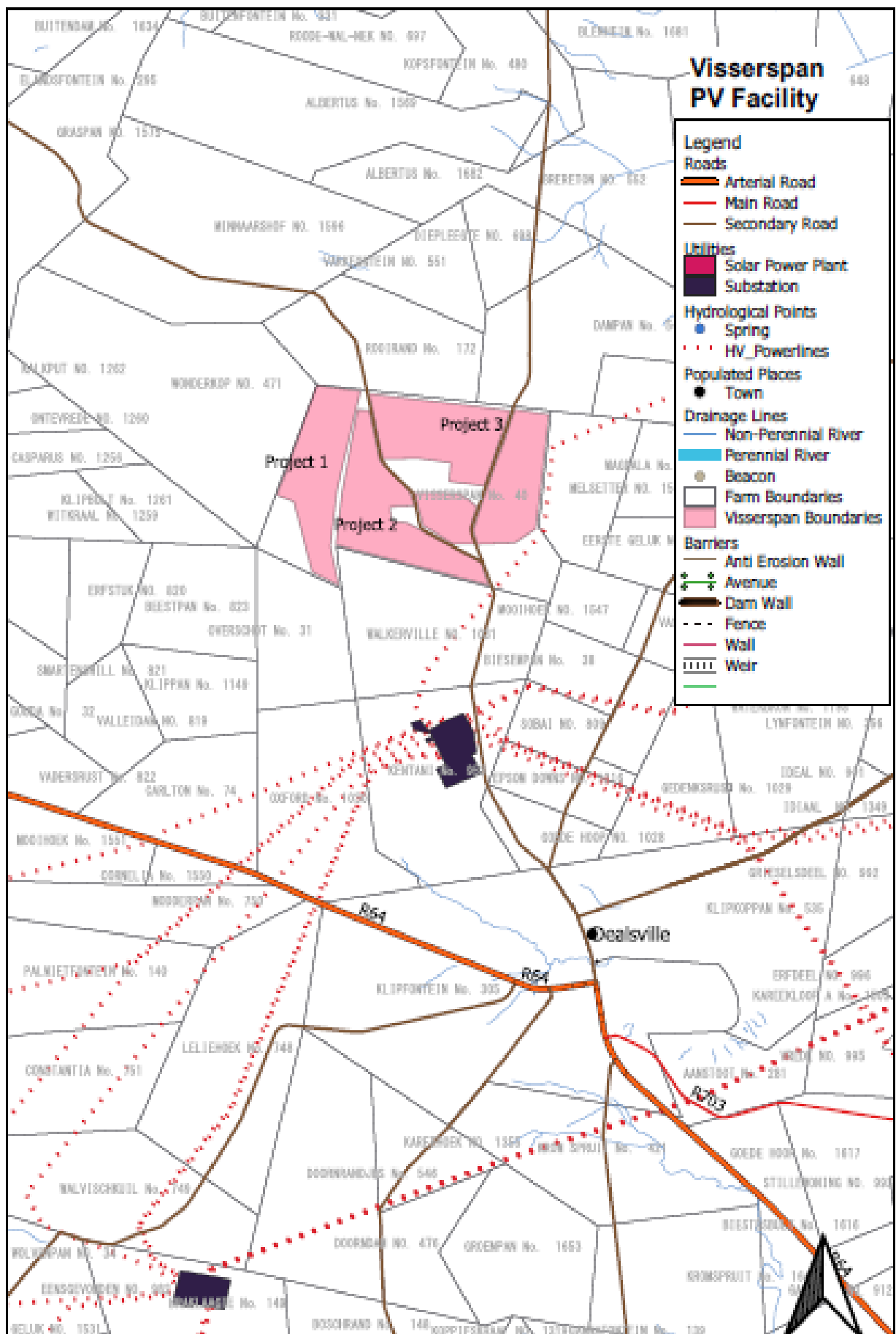


Figure 2: Indication of the proposed Visserspan Solar PV Facility - Project 3's position, relative to other proposed solar PV arrays on the Farm Visserspan (cumulative depiction should all the Visserspan Project be authorised and developed), as well as relative to Eskom's existing high voltage power lines and Perseus substation (closest substation to Visserspan Farm No. 40).

4.1.2. Need and Desirability

The proposed development is in line with the national DoE's IRP 2010-2030 which was promulgated with the aim of providing a long-term, cost-effective strategy to meet the electricity demand in South Africa. The IRP 2010-2030 objectives align with Government's in terms of increased electricity supply sourced from renewable sources, as well as broader environmental and social responsibilities. Furthermore, the proposed renewable energy development is in line with the national REIPPPP strategy.

According to the socio-economic specialist report (attached as Appendix G5), "In terms of national energy planning, the Lejeweletswa District Municipality (LDM) falls within the Kimberley REDZ (Renewable Energy Development Zone). The purpose of the REDZs, linked to power transmission corridors, is to give effect to the Department of Energy's Integrated Resource Plan (IRP), which identifies an increasing role for renewable energy generation in order to bring down the country's carbon footprint.

The IRPs are revised and re-issued every year or two. To facilitate roll-out of renewable energy and meet the ambitious targets set in the IRPs, various economic incentives have been initiated to encourage investment in renewable energy, notably the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP). Evident from policy is that solar power requires a greater subsidy than the other forms of renewable energy.

A Phase 1 Wind and Solar Strategic Environmental Assessment (SEA), completed by the Council for Industrial and Scientific Research (CSIR) in 2015, identified eight REDZs in South Africa. The SEA set out to identify areas in the country that are best suited for wind and solar PV energy projects, based on a holistic assessment of technical, strategic planning, environmental and socio-economic criteria (the report is available for download on the CSIR REDZ website). These were gazetted for implementation by the Minister of Environmental Affairs, in February 2018 (CSIR, 2019)¹.

The Kimberley REDZ was positioned clearly because of the location of the Perseus substation, the biggest in the country and a key link in the Central powerline corridor. The powerline corridors with which the REDZ are associated were identified in the Electricity

¹ CSIR REDZ website <https://redzs.csir.co.za> (homepage) as on 15 December 2019

demand that would be suitable for solar PV development. In this way, the combination of the REDZs and power corridors provides strategic guidance to Eskom on where to prioritise investment in grid infrastructure (CSIR, 2019).

The Lejeweletputswa IDP states that an area suitable for a solar power development and carbon credits is situated in the south of Lejeweletputswa and continues further into Xhariep (to the west). The primary purpose of the Solar Energy Hub strategy is to use the space and natural abundance of sunshine associated with the Free State Province and to capitalise on the carbon credit opportunities to be unlocked by means of planning (Final Draft Free State Provincial Spatial Development Framework 2014, as reported in Lejeweletputswa 2018)). From the perspective of the District, the solar energy projects at Dealesville and Boshof should be promoted to expand into a solar energy hub for the south-western part of the district. The said towns are also indicated as solar energy nodes on the district spatial development framework (SDF) map (Lejeweletputswa, 2018).

Farms in the vicinity of Dealesville have proved particularly popular as locations for solar PV proposals, presumably because of the presence of the Perseus substation there and the relatively low value of agricultural land in the immediate area.

Dealesville is a stagnating town and the development of some of the proposed renewable energy projects in the region will help boost the local economy by injecting capital into the region (mainly during the construction phases of these proposed plants).

5. PROJECT DESCRIPTION

5.1.1. Site Location

Location of all proposed sites:	Visserspan Farm No. 40, approximately 10km northwest of Dealesville and 68km northwest of Bloemfontein, in the Free State Province
Farm / Erf name(s) and number(s) (including Portions thereof) for each proposed site:	Visserspan Farm No. 40, near Dealesville, Tokologo Local Municipality, Lejeweletputswa District Municipality, Free State Province Note: see Appendix K (Owner's Consent)
Property size(s) in m² for each proposed site:	12 754 069m ² (only one proposed property and one proposed site for Project 3's 222ha development footprint)
Development footprint size(s) in m²:	Approximately 2 220 000m ² (222ha)
Surveyor General (SG) 21 digit code for proposed site:	F00400000000004000000
Local Municipality:	Tokologo Local Municipality
District Municipality:	Lejeweletputswa District Municipality

Table 1: Visserspan Solar PV Facility - Project 3 development locality details

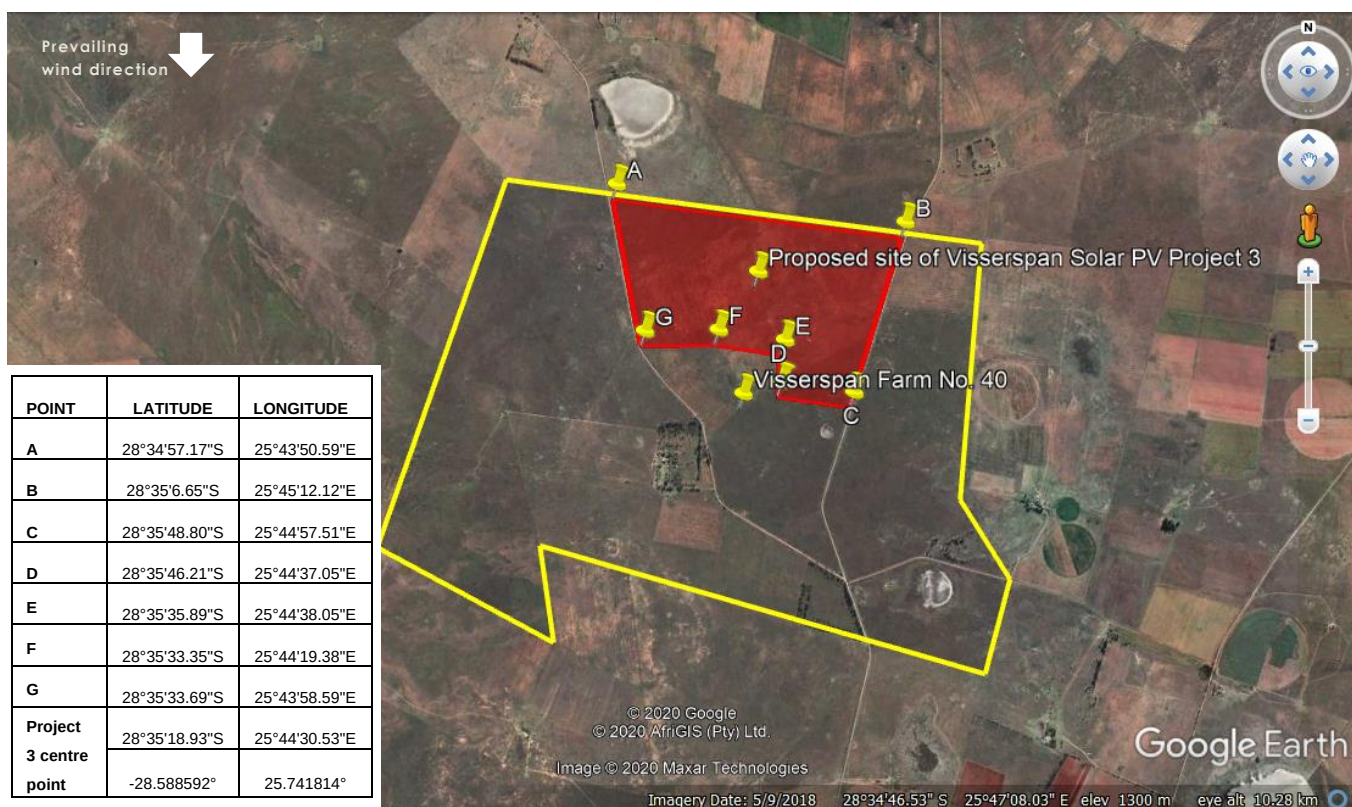


Figure 3: Visserspan Solar PV Facility - Project 3 (outlined and shaded red). Project 3 development locality co-ordinates indicated as located within Visserspan Farm No. 40 (outlined in yellow).

5.1.2. Site Description

According to the general botanical biodiversity survey done towards the end of 2018 and reported on by the botanical specialist early in 2019 (Appendix G1), only one vegetation type, Vaal-Vet Sandy Grassland, occurs on Farm Visserspan No. 40.

Nonetheless, a small deviation from this occurs in the southwest corner of the farm, where trees of *Vachellia karoo* (*Acacia spp.* commonly known as sweet thorn trees) are present. MacDonald (2019) identified this area as a 'no-go' area. The south western corner of the farm was, therefore, excluded from potential land to be considered for placement of Visserspan Solar PV Facility - Project 3's development footprint.

The above-mentioned botanical scan determined the:

- (i) vegetation type/s and condition;
- (ii) veracity of the existing CBA (conservation status) map;
- (ii) sensitivity of the vegetation and
- (iv) areas that could be considered for the construction of a PV facility.

Although the BGIS maps included in Appendix B (Sensitivity Maps) indicate that almost all of the development footprint proposed for Project 3 is a CBA 1 area, a site visit to ‘ground-truth’ the critical biodiversity area (CBA) database classification with the actual site, caused the botanical specialist to “*question the CBA 1 classification imposed on parts of the farm*” and to “*contend that the ESA areas and degraded areas are incorrectly mapped*”.

Vaal-Vet Sandy Grassland, is listed as an endangered ecosystem in the National List of Threatened Ecosystems (Government Gazette, 2011). However, due to cattle grazing pressures and the fact that areas of the farm are degraded and have previously been cultivated, it is the professional opinion of the botanical specialist that, except for the no-go area in the south western corner of the farm and the area around the existing farmhouse and the watercourses i.e. pans with a 32m buffer zone around them, the rest of the Farm Visserspan No. 40 “*could all be considered for the construction of solar PV infrastructure*”, as per Figure 10 in Appendix G1 (Botanical impact Assessment) and as included below:

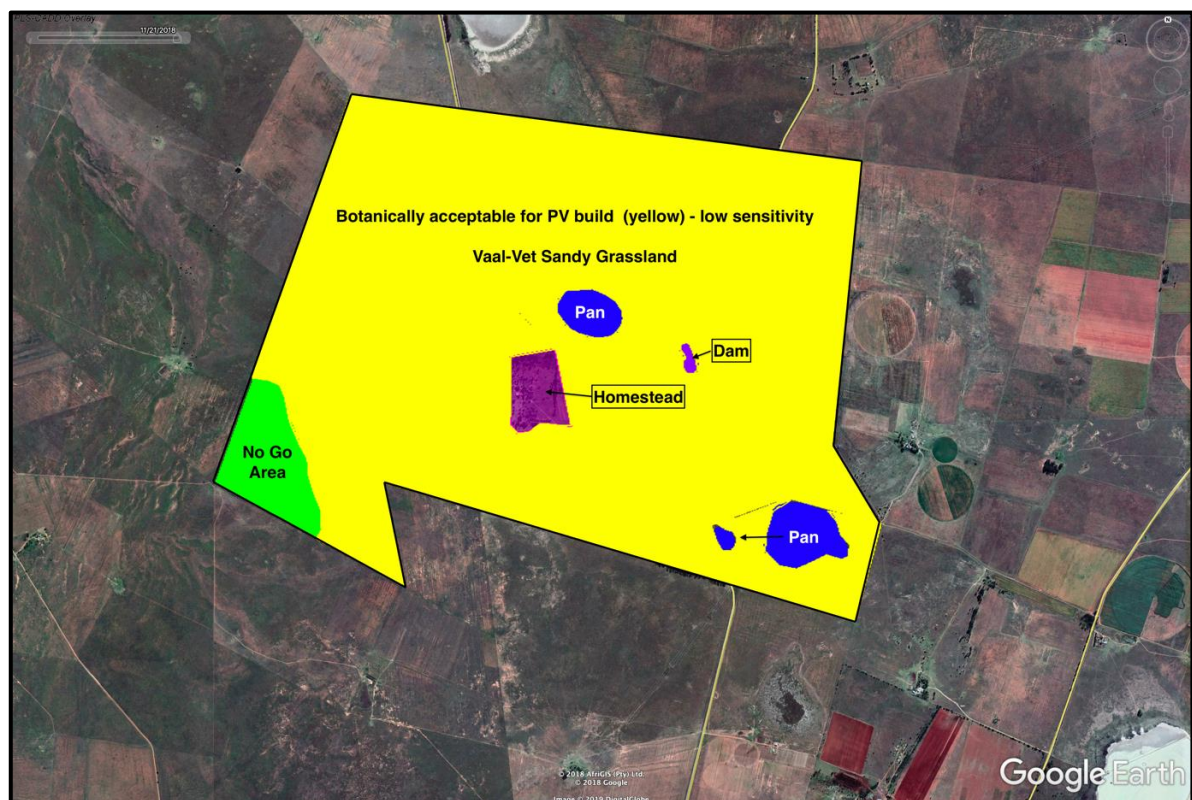


Figure 4: Botanical sensitivity map determined from the botanical field-survey of November 2018. Yellow regions potentially available for development

National Biodiversity Geographic Information System (BGIS) maps, attached as Appendix D, do not indicate that the site falls within any formal or informal protected areas which concurs with the findings of Appendix G3c (Visual Impact Assessment Report) which states

that the nearest Provincial Nature reserves are Soetdoring Nature reserve (35km from proposed development site) and Sandveld Nature reserve 85km from proposed development site). There are, therefore, no reserves within the potential viewshed area. Please refer to Appendix D – Sensitivity Maps.

The topography of the Farm Visserspan No. 40 is relatively flat with a slight rise to the southwest corner of the farm. The footprint of the development area for Project 3 is relatively flat and lies on the northern boundary of the Farm Visserspan No. 40 between the two secondary/trunk roads i.e. the 31999 and 31724. A few depressions are present on the greater Farm Visserspan No. 40. These depressions form seasonal pans. There are two seasonal pans located within the area between the 31999 and 31724 secondary roads. One is a normal pan (the Central Pan) and the other a very small pan referred to by the freshwater specialist as a micro-pan. From the outset of the project planning, the development footprint for Project 3 has deliberately excluded the two pans with at least a 32m setback.

The geology consists of aeolian and colluvial sand that has been laid down over sandstone, shale and mudstone of the Karoo Supergroup, mostly Ecca Group. The soil forms are mostly Avalon, Westleigh and Clovelly. Dolerite has intruded the landscape where Vaal-Vet Sandy Grassland occurs (Figure 9) but it does not occur at Visserspan 40 except for a small outcrop in the southwest corner of the farm that is not prominent enough to be mapped.

Visserspan 40 is located in the summer rainfall region and the climate is classified as warm-temperate. Overall mean annual precipitation (MAP) is 530 mm and temperatures are high in summer and low in winter with severe frosts on average for 37 days of the year. The climate diagram (Figure 5) shows the complete lack of rainfall in winter and rain mainly occurring from November to March.

Although there are a few watercourses (specifically pans) on the greater Farm Visserspan No. 40, there are no watercourses on, or within 32m of, the development footprint site for Project 3, which lies on the extreme northern boundary of the farm. Due to the existing water allocation, it is still to be determined if a water use licence authorisation will be required.

Although the topography may appear fairly flat, the landscape is characterised by undulating rises and valleys which create significant visual screening for infrastructure with a low vertical extent. Any structures under 10m can be easily absorbed into the landscape. The general topography of specifically Project 3, is characterised by a relatively flat terrain for the entire proposed development footprint. There is a wetland/pan towards the centre of the scattering of mature *Acacia spp.* (sweet thorn trees) on the slopes of this hill and it is therefore indicated by the botanical specialist, as a no-go area in terms of land available for Project 3's development area.

The existing farmhouse and smaller storage building which stand more or less central to Visserspan Farm No. 40 and their immediate surroundings, have been indicated as an area not available for development (refer to Figure 4 above). The structures themselves are in a state of disrepair although they are clearly very old (refer to Appendix G3a).

Photographs of existing buildings and structures on the Larger property of Visserspan Farm No. 40 and included in the archaeological impact assessment report attached as Appendix G3a. Personal communication from the only residents on the farm indicated that the structures are possibly around 125 years old. This concurred with Kaplan (2020) who dates the structures *circa* 1899. The development footprint of Visserspan Solar PV Facility - Project 3 is not adjacent to these buildings, although, the access road to Project 3 will probably pass nearby the structures. Since the existing farmhouse and associated structures have been indicated as in an area excluded from development and is relatively far from Project 3's footprint area.

5.1.3. Proposed Development Description

The proponent, Ventura Renewable Energy (Pty) Ltd, plans to establish a solar facility which harvests light energy from the sun using solar photovoltaic (PV) panels and converts the light energy into electrical energy to be fed into the national (Eskom's) electricity grid. The development footprint for proposed Project 3 facility is an area of approximately 222ha on the Farm Visserspan No. 40, near Dealesville, Tokologo Local Municipality, Free State Province. This solar facility is, in essence, a solar power station which is planned to form part of the country's renewable energy electricity generation capacity should the Applicant be successful in its bid to be selected as an independent power producer (IPP).

The Visserspan Solar PV - Project 3 Facility is proposed to be established on a site located at 28°35'18.93"S, 25°44'30.53"E (approximate centre point), within Renewable Energy Development Zone 5 (REDZ 5) on Visserspan Farm No. 40, about 8km northwest of Dealesville and 70km northwest of Bloemfontein.

Traveling northwest from Bloemfontein along the R64 national road, one passes through the small town on Dealesville. Leaving the R64 and continuing north through Dealesville one passes several farms/areas which have also been earmarked for solar facility developments in the vicinity of Eskom's Perseus substation, the largest sub-station in Southern Africa. The farm Visserspan lies north of Perseus sub-station and is currently the furthest solar PV application site north of Dealesville located in REDZ 5.

The location of the proposed Visserspan Solar PV development within REDZ 5 lies within one of the country's strategic transmission corridors. Appendices A and G3c of the BAR include mapstool which indicates the potential cumulative aerial visual impact of Visserspan's location, relative to other solar PV and CPV project applications in the region. The Visual Assessment Impact report also indicates those application which have already received approval. It is the opinion of the EAP that, despite the designation of REDZ 5, should all the proposed renewable energy projects be built, it would be a Applications impact radius for proposed solar PV development site relative to other approved.

The proponent intendeds to develop Visserspan Solar PV Facility - Project 3, at this particular location since it falls within REDZ 5 which has favourable suitability in terms of solar energy harvest potential, topography, accessibility, tie-in to the Eskom grid and somewhat mitigatable visual and environmental negative impacts.

The proposed development will be a north facing array of poly-crystalline solar photovoltaic (PV) modules most probably grouped into tables or panels of 20 modules each and situated in parallel rows along an east to west axis covering most of the 222ha footprint. It is proposed that Project 3's development footprint will be surrounded by a perimeter fire access road and fence. The actual array of PV panels will not completely fill the 222ha footprint which also needs to cater for infrastructural requirements.

Refer Appendix B of to the Visual Assessment Report (attached as Appendix G3c of this BAR) for simulated depictions of the fence and solar panel arrays on the proposed site. It should be noted that the negative visual impact from the proposed (more ground based) Viesserspan solar PV development is much less than that of the visually intrusive arrangement of a CPV plant or even a crystalline PV plant where the panels are raised on 10m to 15m high pedestals.

As per Figure 1 above, the PV tables will be raised approximately 500mm above ground level and will have single axis tracking systems allowing the generation of not more than 100MW of direct current which will be converted to alternating current before being evacuated into the national grid. The actual generation capacity of the facility itself may be a little more than 100MW but a maximum of 100MW will be available to the national grid since the facility will require some power for its own functioning.

Proposed associated infrastructure to be built on the 222ha footprint site includes a fenced construction staging area, a few maintenance sheds, inverter-transformer stations on concrete pads, a switch panel for connection to the power grid and an office with septic tank ablutions. The three-phase, 22kV, electricity evacuation power lines are proposed to run along a predetermined servitude to connect with the existing Eskom transmission lines to the east of the Farm Viesserspan *en route* to Eskom's Perseus substation.

Although not part of this application process, the evacuation powerlines are proposed to be subsurface (underground) powerlines until they connect with a proposed substation to be located within Viesserspan - towards the eastern boundary of the Farm Viesserspan No. 40. From the substation which will probably be situated immediately adjacent to the existing Eskom high voltage (HV) powerline servitude on the farm Melsetter. It is proposed that the powerlines run above-ground within the Eskom HV servitude for tie in with the national grid. It should be reiterated that the HV lines and substation are not being applied for in this application process but will be handled as a separate independent application, once routes have been finalised with Eskom. Electricity is evacuated from a solar PV facility in MWac (alternating current) with the solar PV facility capacity rating being in direct current and measured as a peak value under optimal conditions i.e. MWp. The maximum generation capacity of the facility is approximately not more than 100MW. Solar PV farms produce electricity in direct current which must be converted into alternating current and transformed into the correct voltage before it can be fed into the national grid. This conversion is done

by inverters and transformers which are part of the abovementioned infrastructural development of the project.

Description of Development Phases

Equipment and Material Delivery/Site Preparation:

The proposed development site is accessible from larger centres using the R64 (heading to Dealesville) and then utilising the 31999 secondary road to reach the Farm Visserspan No. 40. PV modules and steel structures will be transported to site using interlink trucks. The main transformers, graders and 20-ton rollers will be delivered to site using abnormal load vehicles. In addition to these vehicles, drill rigs, 10m³ tipper trucks, several tractors and trailers, a waste transport truck, site bakkies, one water tanker truck, track-loader-backhoes (TLBs) and trenching machines, will also be used on site.

The area will be graded and levelled using a 20-ton roller. Water spray from the water tanker truck will be used to control excessive dust blow off. About three to four temporary access roads will have to be established on site in addition to the long-term perimeter fire and main access road. The main access road will enable vehicular access to each solar panel system within the site. All roads created as part of the solar facility will be untarred / unpaved.

Construction:

Each drilling machine which will be used for drilling the substructure post holes, is equipped with a dust control system. The system extracts the dust away from the hole while drilling using vacuum. Collected dust can then be removed in a controlled manner from the back end of the machine once a certain amount is reached.

Concrete transformer pads for each row of solar panels, a switch panel for connection to the power grid, and control sheds would be constructed on site

Development of the electrical systems would take place in conjunction with installation of the rest of the structures. In brief terms, it includes all electrical cabling and trenching (field trenching in and around the entire site where the units will be installed should take place after the installing the pedestals) that connects all solar units, collects the energy from them, and then routes it to a point of connection with the utility infrastructure system.

Approximately 30 to 60 people are envisaged to be required during the construction phase, which is expected to last for 6-8 months. Positions will be filled by mostly local labour from the area where possible and are not to be housed onsite.

Operation:

The proposed solar facility is based on the single axis tracking system for adjustment of the panels or tables carrying the solar PV modules. One of the reasons for selecting this tracking system is the configuration flexibility which facilitates good utilisation of the available land and maximises the “pitch” or distance between tables. This minimises the shading effects tables have on each other. Each table is equipped with a bow or curved component which carries a ring gear. The horizontal shafts have short worm gears which run against the ring gears to effect table adjustment. Tracking of the sun in a single axis solar PV system is usually aligned roughly along the north to south axes. The PV farm tracking system can be operated either automatically or remotely. The tracker adjustment range is -50 to +50 degrees. The pitch between tables would be 6m. The tracker controllers are an integral part of the tracking system and they provide backtracking functionality in order to minimise the effects of shadowing.

Solar polycrystalline PV modules will be grouped together in a panel or table which would be mounted with the long edges perpendicular to the tracking axis. All the modules in a table would be electrically interconnected to form a string.

The array of the tables would be connected to 1000kVA, 1000V inverters, the rating being selected to allow for the reactive power requirements of the South African grid code.

During periods of high wind or when undergoing maintenance, the solar arrays would be shifted to a stand-by mode, where the panels are placed in a horizontal position (facing upward and parallel to the ground).

Approximately 100 workers (70 direct and 30 indirect) are envisaged to be required during the operational phase of the proposed solar development (actual numbers to be confirmed). The lifespan of the development is expected to last for about 25 years. Positions will be filled by mostly local labour from the area and are not to be housed on site.

Periodic maintenance activities involve replacing non-functioning cells or other mechanical parts essential to the operation of the arrays. Trips to the solar PV farm to undertake maintenance would occur on an as-needed basis. Maintenance visits may not occur

immediately after a module ceases to function or a part becomes damaged – the Project Applicant would determine whether the benefit of the maintenance trip outweighs the cost of that additional trip. It is assumed, however, that maintenance visits would occur four to six times per year. Individuals responsible for maintenance activities would most likely commute from regional offices or nearby operating facilities.

Since sunlight can be absorbed by dust and other impurities on the surface of the photovoltaic panels, washings would periodically be needed. An existing borehole exists on Visserspan Farm No. 40 with a water allocation that is far from being fully utilised. The proponent is in discussion with the Department of Water and Sanitation regarding water availability from the existing water allocation for use by the proposed solar PV development has not yet been fully determined. Water utilisation during construction and during operation and maintenance/ad-hoc cleaning events would be required for cleaning the photovoltaic panels. During maintenance, waste separation and recycling will take place as per the facility's environmental management programme.

Decommissioning:

The solar energy facility is expected to have a lifespan of +/-25 years. The facility would only be decommissioned and the site rehabilitated, once it has reached the end of its economic viability. It would most likely be due to the enhancement of technology/infrastructure in the future of renewable energy.

Note: Throughout all phases of the development lifecycle i.e. site preparation, plant construction, operation, maintenance and final decommissioning, waste management in line with the project's environmental management programme includes waste separation, timely periodic waste removal to registered waste sites and recycling where possible.

Please refer to Appendix D for biodiversity, ecological and protected areas sensitivity maps of the proposed development site.

Botanical/Biodiversity:

According to the botanical biodiversity survey done towards the end of 2018 and reported done by the botanical specialist early in 2019 (Appendix G1), only one vegetation type, Vaal-

Vet Sandy Grassland, occurs on Farm Visserspan No. 40. Nonetheless, a small deviation from this occurs in the southwest corner of the farm (not where Project 3 is located), where trees of *Vachellia karoo* (*Acacia spp.* commonly known as sweet thorn trees) are present. The botanical specialist, Dave MacDonald, identified this area as a 'no-go' area and it is, therefore, excluded from potential land to be considered for any project's placement. However, Visserspan Solar PV Facility - Project 3's development footprint does not lie close to this botanical no-go area. The botanical ground-truthing site assessment concurred with the freshwater specialist's site assessment that the ESA designated on the farm is incorrectly mapped.

The above-mentioned botanical scan determined the:

- (i) vegetation type/s and condition;
- (ii) veracity of the existing CBA (conservation status) map;
- (ii) sensitivity of the vegetation and
- (iv) areas that could be considered for the construction of a PV facility.

Although the BGIS maps included in Appendix B (Sensitivity Maps) indicate that almost all of the development footprint proposed for Project 3 is a CBA 1 area, a site visit to 'ground-truth' the critical biodiversity area (CBA) database classification with the actual site, caused the botanical specialist to *"question the CBA 1 classification imposed on parts of the farm"* and to *"contend that the ESA areas and degraded areas are incorrectly mapped"*.

Vaal-Vet Sandy Grassland (Gh10) is listed as an endangered ecosystem in the National List of Threatened Ecosystems (Government Gazette, 2011). The professional opinion of specialist is that, except for the no-go area in the south western corner of the farm, the areas around the existing farmhouse and the watercourses i.e. pans with a 32m buffer zone around them, the rest of the Farm Visserspan No. 40 *"could all be considered for the construction of solar PV infrastructure"*, as per Figure 10 in Appendix G1 (Botanical impact Assessment).

BGIS maps do not indicate that the site falls within any formal or informal protected areas which concurs with the findings of Appendix G3c (Visual Impact Assessment Report) which states that the nearest provincial nature reserves are Soetdoring Nature reserve (35km from proposed development site) and Sandveld Nature reserve 85km from proposed

development site). There are, therefore, no reserves within potential viewshed area. Please refer to Appendix D – Biodiversity Sensitivity Maps.

Although there are a few watercourses (specifically pans) on the greater Farm Visserspan No. 40, there are no watercourses on, or within 32m of, the development footprint site for Project 3, which lies on the extreme southern boundary of the farm.

Due to the existing water allocation, it is still to be determined if a water use licence authorisation will be required. However, although the watercourses have been deliberately avoided in terms of the NEMA with respect a 32m setback allowance, listed activities in terms of the National Water Act, No.

Although the topography may appear fairly flat, the landscape is characterised by undulating rises and valleys which create significant visual screening for infrastructure with a low vertical extent. According to the visual impact specialist, *“any structures under 10m can be easily absorbed into the landscape”*.

The general topography of specifically Project 3, is characterised by an increased slope/hill to the south western corner of the proposed development footprint. There is a scattering of mature *Acacia spp.* (sweet thorn trees) on the slopes of this hill and it is therefore indicated by the botanical specialist, as a no-go area in terms of land available for Project 3’s development area.

It should be noted that a faunal specialist was not part of the biodiversity assessment – the focus was primarily on botanical biodiversity. It is expected that that several faunal species are found in the area

The Dealesville area lies in a summer rainfall region with the climate being classified as ‘warm-temperate’. Mean annual precipitation (MAP) averages 530 mm. Temperatures are high in summer and low in winter with severe frosts on average for 37 days of the year. There is a complete lack of rainfall in winter with rain falling primarily from November to March.

Freshwater:

Dirk van Driel of Watsan Africa was responsible for freshwater specialist studies undertaken on Visserspan Farm No, 40.

There are wetlands present on the Visserspan property which are classified as National Freshwater Ecosystem Priority Areas (NFEPAs) in the national biodiversity geographic information systems (BGIS) database (refer to BGIS 'Wetlands and NFEPAs Map' in Appendix D. The most significant wetlands relevant to Visserspan Solar PV Facility – Project 3's development footprint are the 'central pan' and the 'micro-pan' as referred to by the freshwater specialist (as per Appendix G2 – Freshwater Impact Assessment).

Stormwater runoff from Project 3 will flow into the central mixed grass pan and some of the runoff will flow towards the micro-pan. The PV panels will act like hard surfaces in terms of a rainfall/storm event. The ground between the panels will remain unpaved and subsurface permeation of rain water into the ground will not be affected. According to the freshwater specialist, it is **not** expected that the flow into the central pan will be modified.

The access roads will create preferential flow paths. This should be prevented by proper drainage infrastructure around all of the roads in and around the PV units. There already is a flow modification with the current roads and paths in and around the central pan and its catchment.

The flow in and around the central pan and the catchment area has already been modified because it has been ploughed over.

Figure 5, below, indicates the development footprint of Project 3 relative to the central and micro- pans. Appendix D also contains the BGIS Biodiversity Maps which indicate the misaligned ESA as previously mentioned.

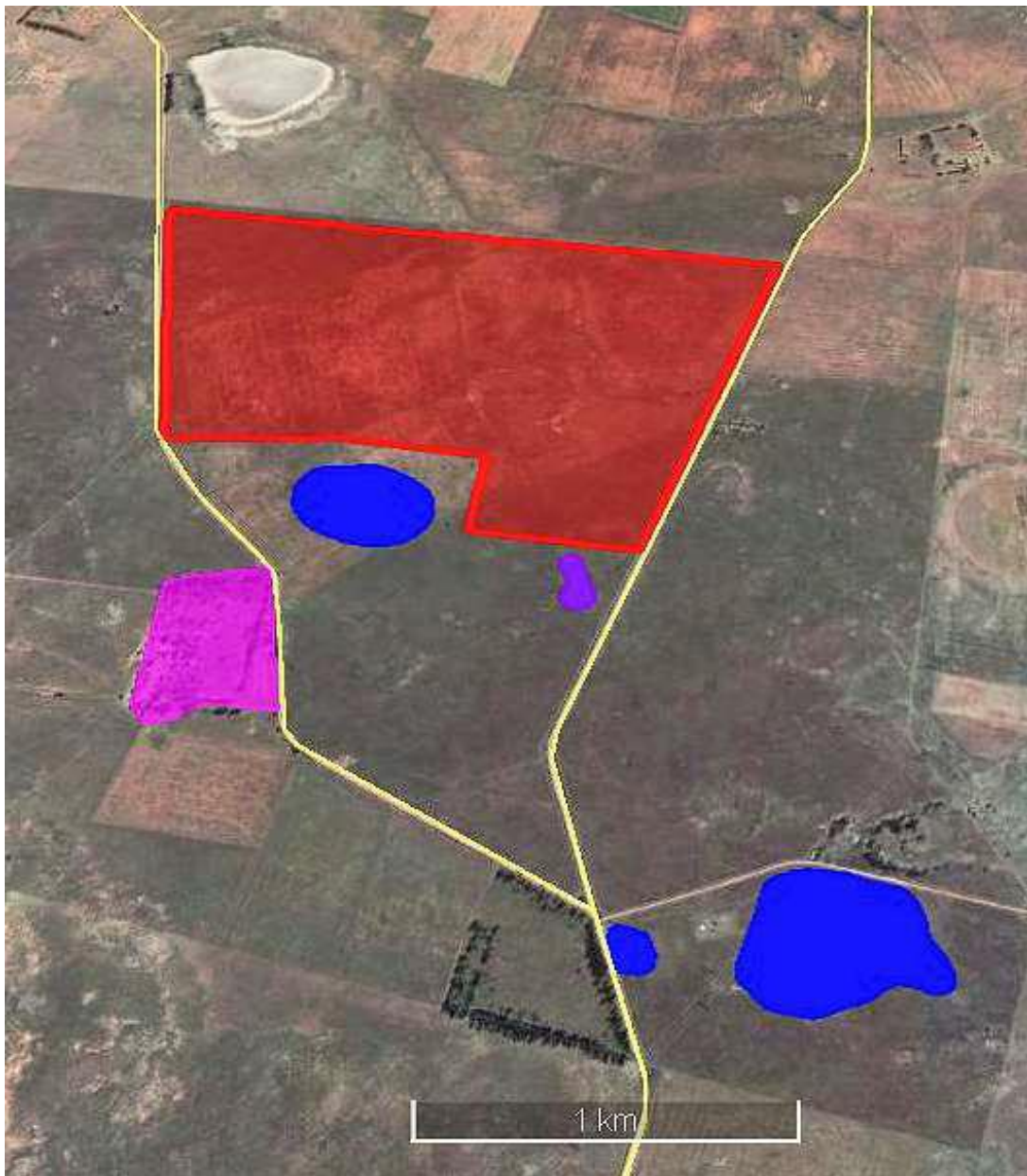


Figure 5: Visserspan Solar PV Facility – Project 3 development footprint (indicated in red) which deliberately avoid the central pan and micro-pan which lie to the south and southeast of the centre point of proposed Project 3.

According to NEMA, developments within 32m of any water course (whether ephemeral or not), must be duly authorised by the relevant government authority. However, at the outset of this project, it was determined to avoid as many sensitive areas as possible. Therefore, all facility development will take place at least 32m away from the delineated edge of the watercourse.

In terms of the National Water Act, No. 36 of 1998 (NWA), no development can take place within 500m of a wetland, unless official approval is granted. For this approval a water use licence application (WULA) is required and is being addressed in a separate process to the NEMA environmental authorisation.

A water use licence application may still need to be submitted to address the proposed use of water for the project from the existing groundwater allocation available to the farm. This allocation is currently under-utilised. However, this allocation, or the authorisation process for the possible extraction of groundwater and harvesting of rainwater for the facility, will need to be addressed with the Department of Water and Sanitation in a separate application process.

Geology:

The general geology of the Farm Visserspan No. 40 comprises aeolian and colluvial sand that has been laid down over sandstone, shale and mudstone of the Karoo Supergroup, mostly Ecca Group. The soil forms are mostly Avalon, Westleigh and Clovelly. Dolerite has been known to 'intrude the landscape' where Vaal-Vet Sandy Grassland occurs but only does so for a small outcrop in the southwest corner of the Visserspan farm that is not very prominent at all.

Heritage:

Archaeological:

A field assessment by Jonathan Kaplan of ACRM of the proposed Visserspan Solar PV Facility took place between the 30th of November and the 3rd December 2019.

According to the specialist archaeological impact assessment (as per Appendix G3a), on the proposed development footprint area for Visserspan Solar PV Facility – Project 3, a few weathered, hornfels Middle Stone Age (MSA) flakes and chunks were recorded on eroded patches of ground, below the thin top soils. A few weathered MSA hornfels flake tools were also noted alongside a heavily trampled berm on the edge of a dry pan. A MSA unifacial point was also found. A broken elliptical grindstone was found in a small cattle footpath. A silcrete flake was found in the north western corner of the study area.

No evidence of any Late Iron Age archaeological heritage were noted during the field assessment, which appears to be absent from the study area.

No evidence of any Anglo-Boer War battlefield sites (1899-1904), war graves or memorials were encountered during the study”.

Palaeontological:

On 11 January 2020, John Almond of Natura Viva CC and an experience field assistant undertook the palaeontological impact assessment of the proposed development site.

According to the specialist palaeontological impact assessment report attached as Appendix G3b, it was “concluded that the palaeontological sensitivity of the solar PV project area on Farm Visserspan No. 40 near Dealesville is low. Anticipated impacts on local palaeontological heritage resources from the construction phase of the developments are accordingly also of LOW SIGNIFICANCE.

This applies equally to all four of the proposed solar PV facilities whose cumulative impact significance would also be LOW.

No further significant impacts are expected during the operational and decommissioning phases of the developments.

There are no fatal flaws in the development proposals”.

The palaeontological specialist further states that provided that the recommended mitigation measures as detailed in the Palaeontological Impact Assessment Report (as per Appendix G3b) are fully implemented, there are no objections on palaeontological heritage grounds to authorisation of the proposed Visserspan Solar PV Facility.

Visual:

Sarien Lategan was appointed to undertake the visual impact assessment for the Visserspan PV Facility, Project 3, near Dealesville, Free State. The term visual and aesthetic is defined to cover the broad range of visual, scenic, cultural, and spiritual aspects of the landscape. It also includes the impact on ‘sense of place’ of the area.

At the time of assessment, detail regarding the exact technology and site layout was not yet available. The most probable technology would be Single axis tracking PV arrays, with an assumed maximum vertical height of 3m. Should a different technology thus been decided on which involve smaller units, the visual impacts will certainly be less than what is assessed in this report.

The viewshed of the site is limited by the topography which is characterized by low undulating rises and valleys which created a medium level of visual absorption. Due to the low vertical extent of the proposed development, this absorption rate is sufficient to reduce the viewshed for the particular project proposal.

An assessment of the potential visual receptors through the use of landscape profiles coupled with on-site verification was undertaken. The visual receptors in the area are of medium to low sensitivity. The assessment finds that the overall visual impact of the proposed Project 3 of the Visserspan PV facility holds a low overall visual impact. For this reason, no mitigation measures are required.

Due to the fact that a number of PV facilities have been approved to the south of Project 3, the project does contribute to the cumulative impact specifically to spatial crowding. The pro rate contribution to the overall number of approved projects is however low. Since no thresholds have been determined on a regional level it is not appropriate to assess the impact on landscape change.

The proposed site is situated in a rural area with natural *Acacia spp.* trees, as well as planted alien invasive (*Eucalyptus spp.*) vegetation. The area displays a rural character with low intensity farming, game farming and natural areas. The Eskom (Perseus) substation is relatively close to the site and an HV power line servitude runs to the east of the Farm Visserspan No. 40 towards Perseus substation in the south.

When comment is received from the South African Heritage Resource Agency (SAHRA), it will be included in Appendix E (Correspondence from Organs of State) of the final BAR.

Soil, Land Use and Agricultural Potential Impact Assessment:

Terra Soil Science, represented by Johan van der Waals, was appointed by EnviroAfrica CC to undertake the soil properties, land capability and agricultural potential assessment (as per Appendix G4).

Due to the soil properties, land use for the type of land found on the proposed development site, is extensive grazing due to climatic constraints.

According to the specialist, *“land capability mimics the land use” and “the agricultural potential in terms of dryland cropping is low due to lower than 500 mm rainfall per annum, with grazing potential being dependent on rainfall and management”*.

It was concluded by the specialist that *“the proposed development of a photovoltaic facility on the site will not have large impacts due to the low agricultural potential of the site as well as the rainfall that is below 500 mm pa.*

The impacts on the site need to be viewed in relation to the opencast mining of coal in areas of high potential soils – such as the Eastern Highveld. With this comparison in mind the impact of a solar energy facility is negligible compared to the damaging impacts of coal mining – for a similar energy output. Therefore, in perspective, the impacts of the proposed facility can be motivated as necessary in decreasing the impacts in areas where agriculture potential plays a more significant role”.

Socio-economic:

Caroline Henderson representing EMC² conducted the socio-economic survey for the proposed project (as per Appendix G5). As such, the specialist has indicated *“no strong opinion, from a socio-economic point of view, as to whether the Visserspan solar PV projects should be permitted, either singly or together”* but notes positive and negative factors regarding the Visserspan Solar PV Project.

Factors supporting a positive decision as listed in the draft socio-economic report:

- *“The proposals are aligned with the State’s energy security, energy generation and carbon footprint policies and plans;*
- *The proposed projects are aligned with spatial plans for the sub-region in which they are proposed*
- *The nation will benefit from enhanced energy security and reduced carbon footprint*
- *The land to be developed is relatively low capacity, low value grazing land, will have no significant effect on present grazing activities linked to the property*
- *The development of Project 3 will in itself have no discernible effect on broader farming life styles in the area*
- *The significantly poor portion of the Dealesville community and residents will benefit from job opportunities offered by one or more of the projects, even though the number of jobs on offer will be limited*
- *Developmental opportunities will be afforded to the Tokologo Local Municipality, particularly Dealesville itself, by means of the increased circulation of money, generated by each project and collectively by the four solar PV projects, in the local economy”.*

Factors supporting a negative decision as detailed in the draft socio-economic report:

- *“Other economic opportunities for local communities will be limited because this is new, sophisticated technology of which economically active residents in the area have little experience. Economic displacement may thus be equally likely as economic benefit.*
- *Project 3 abuts the largest number of other farm properties, hence has the greatest potential for impacts to neighbouring owners and residents, although there are no residents within 1 km of the boundaries.*
- *The cumulative effect of a large number of solar PV array developments in the Dealesville area will negatively affect the landscape quality, ‘sense of place’ of the sub-region and tourism activities in some parts.*
- *The Dealesville community’s interests are not uniform nor unified: there is a significant body of farmers who are opposed to solar PV development in the area on the basis of its potential to reduce property values, reduce the land area available for productive farming, and disrupt the farming lifestyles that have prevailed here for generations”.*

At the same time, there are farmers who are in support of the solar PV developments since they stand to benefit directly from servitudes or leases of their land. The declaration of the REDZ 5 has been an issue of contention among the farming community causing a divide between those who would directly benefit from the proposed developments and those who, directly and indirectly, would suffer losses of one form or another due to the developments.

Civil and Electrical Services:

Electricity for the solar PV facility itself will be sourced from the power generated since will be sourced from the nearest municipal power point i.e. the nearest metered municipal alternating current (AC) power supply point.

The proposed development of a telecommunication mast will not produce waste or use water during its operational phase. The small amount of domestic waste produced during construction will be removed for disposal at the nearest registered municipal waste site.

Access

New internal access roads will be constructed but external access to the Farm Visserspan and Projects 1's site will take place via the existing R64 tar road and the 31999 and 31724 dirt/gravel secondary roads. The proposed site lies on the southern boundary of the Farm Visserspan No. 40 and internal road and tracks exist but some may need to be formally graded and/or widened.

SANRAL notification/comment has been requested as per Appendices F2 and F3 (Public Participation) but is still not forthcoming.

Please refer to Appendices A (Locality Maps), B (Layout Plans) and C (Site Photographs) to see accessibility to the proposed development site, as discussed above.

6. LEGAL REQUIREMENTS

6.1. General Environmental Requirements

The National Environmental Management Act, No.107 of 1998 (NEMA), as amended, makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the competent authority based on the findings of an Environmental Assessment.

NEMA as a national act, is enforced by the national Department of Environment, Forestry and Fisheries (DEFF). Typically, these powers are delegated to the provincial department of environmental affairs but since the legislated (or listed) activity which results from the proposed development, occurs in an area of strategic importance identified in terms of Section 24(3) of NEMA, namely in a Renewable Energy Development Zone (REDZ) and associated strategic transmission corridor, DEFF is the competent authority for this environmental authorisation application.

According to the regulations of Section 24(5) of NEMA, authorisation is required for NEMA listed activities. The following NEMA listed activities as per the 2014 EIA regulations (as amended) were evaluated for applicability:

According to the regulations of Section 24(5) of NEMA, authorisation is required for the following listed activities:

NEMA, EIA Regulations Listing Notice 1 of 2014 (GN. R. 327)

Activity No. 1:

The development of facilities or infrastructure for the generation of electricity from a renewable resource where-

- (i) the electricity output is more than 10 megawatts (MWs) but less than 20MWs; or*
- (ii) the output is 10MWs or less but the total extent of the facility covers an area in excess of 1 hectare (ha);*

Activity No. 11(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 (kV).*

Note: Infrastructure for the transmission of electricity within the proposed solar PV facility itself will be required. It is proposed that all internal powerlines be sub-surface lines.

Activity No. 14:

The development of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres (m³) or more but not exceeding 500m³.

Note: It is very probable that the proposed facility will utilise a battery storage system to ensure reliability of supply considering the fluctuating power output of a solar PV system. Batteries may be defined as ‘dangerous goods’ as per South African National Standards (SANS) 10234 due to the toxicity of their contents e.g. vanadium redox or lithium ion batteries) and/or the flammability of the batteries.

NEMA, EIA Regulations Listing Notice 2 of 2014 (GN. R. 325)

Activity No. 1:

The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20MWs or more.

Activity No. 15:

The clearance of an area of 20ha or more of indigenous vegetation.

NEMA, EIA Regulations Listing Notice 3 of 2014 (GN. R. 324)

Activity No. 2:

The development of reservoirs, excluding dams, with a capacity of more than 250m³.

b. Free State

ii. Outside urban areas:

(dd) Critical biodiversity areas (CBAs) as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans

Note: The construction and effective operation of the proposed solar PV facility will require cleaning and maintenance (periodic washing) of the PV panels. It is not known if water will be supplied directly from the existing borehole on site, or if water will be stored in reservoirs/tanks at various points in the proposed facility to service the facility. According to the South African National Biodiversity Institute’s (SANBI’s) Biodiversity Geographic Information System (BGIS), parts of the proposed development footprint occur within a CBA and an ESA.

Activity No. 4:

The development of a road wider than 4 metres (m) with a reserve of less than 13,5m.

b. Free State

ii. Outside urban areas:

(ee) CBAs as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans

Activity No. 10:

The development of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 30m³ or more but not exceeding 80m³.

b. Free State

ii. Outside urban areas:

(ee) CBAs as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans

Activity No. 12:

The clearance of an area of 300m³ or more of indigenous vegetation.

b. Free State

ii. Within CBAs identified in bioregional plans;

iv. Areas within a watercourse or wetland; or within 100m from the edge of a watercourse or wetland

Activity No. 14:

The development of;

(ii) infrastructure or structures with a physical footprint of 10m² or more;

where such development occurs;

(c) if no development setback exists, within 32m of a watercourse, measured from the edge of a watercourse;

b. Free State

i. Outside urban areas:

- (ff) CBAs or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans.

Possible authorisation is required for the following NEMA listed activities:

NEMA, EIA Regulations Listing Notice 1 of 2014 (GN. R. 327)

Activity No. 9(i):

The development of infrastructure exceeding 1000m in length for the bulk transportation of water or storm water;

(i) with an internal diameter of 0,36m or more; or

(ii) with a peak throughput of 120 litres per second or more;

excluding where;

a) such infrastructure is for bulk transportation of water or storm water or storm water drainage inside a road reserve;

Note: It is a recommendation of the BAR that groundwater, used internal to the facility for ablutions and the maintenance/periodic washing of the solar panels, be transported in pipes with an internal diameter of around 160mm i.e. 0,16m. Should this recommendation be acceptable to the final engineering specifications, then listing notice 3, activity 9(i) will not be triggered

Activity No. 12(xii)(c):

The development of;

(x) buildings exceeding 100m² in size;

(xii) infrastructure or structures with a physical footprint of 100m² or more;

where such development occurs;

(c) if no development setback exists, within 32m of a watercourse, measured from the edge of a watercourse;

Note: Listed activity 12(xii)(c) may not be triggered depending on final layout arrangements of the facility. This DBAR recommends that 32m buffer zones around any water courses be maintained. If this is adhered to in final layout plans, then authorisation for listed activity 12(xii)(c) will not be required.

NEMA, EIA Regulations Listing Notice 2 of 2014 (GN. R. 325)

Activity No. 9:

The development of facilities or infrastructure for the transmission and distribution of electricity with a capacity of 275kV or more, outside an urban area or industrial complex.

Other legislative requirements, pertinent to the proposed project, include but are not limited to those detailed below.

6.2. Other legislative and guideline documents: (List not exhaustive)

Relevant Act/Notice:	Site or Project Specific Applicability/Description
National Water Act, No. 36 of 1998	Possible water use licence or general authorisation application for use/extraction of groundwater or confirmation of allocation, mas well as for potential Section 21 listed activities.
National Environmental Management: Biodiversity Act, No. 10 of 2004	Control of alien invasive species
National Environmental Management: Protected Areas Act, No. 31 of 2004	Assessment of proposed development location in terms of Act.
National Environmental Management: Air Quality Act, No. 39 of 2004	Adherence to legal requirements during construction, operation and maintenance.
National Environmental Management: Waste Act, No. 59 of 2008	Adherence to legal requirements during construction, operation and maintenance.
National Forests Act, No. 84 of 1998	Comment (possible permit or licence application) in terms of protected tree/flora species damage or removal – botanical survey did not indicate any protected species.
Conservation of Agricultural Resources Act, No. 43 of 1983	Possible relevance in terms of utilisation and protection of vleis, marshes, water sponges and water courses.
National Heritage Resources Act, No. 25 of 1999	Adherence to Section 38 of Act.
National Road Traffic Act, No. 93 of 1996	Compliance with Act in terms of transportation of abnormal loads to project site.
South African National Roads Agency Limited (SANRAL) and National Roads Act, No. 7 of 1998	Sub-surface crossing of the secondary dirt/gravel road/s will be required and SANRAL

Civil Aviation Act, No.13 of 2009 and Civil Aviation Regulations (1997)	This application does not include the power lines for evacuation of electricity into the national grid. However, this application proposes that any internal facility and electricity/power evacuation lines which will eventually tie in with the main Eskom lines, along predetermined servitudes, run underground (sub-surface)
Civil Aviation Authority Act, No.40 of 1998	Possible above surface structures (overhead powerlines for tie in to Eskom HV lines requiring obstacle application process)
Astronomy Geographic Advantage Act, No. 21 of 2007	Comment required regarding potential setbacks and visual impact mitigation.
National Veld and Forest Fire Act, No. 101 of 1998	Adherence to firebreak establishment and maintenance.
Fencing Act, No. 31 of 1963	Adherence to fencing and access control specifications.
Free State Nature Conservation Ordinance, No. 8 of 1969	Assessment of protected or endangered species.
Spatial Planning and Land Use Management Act, No. 16 of 2013 (SPLUMA)	A consent use and change in land use planning application in terms of Section 35 of the SPLUMA regulations and Section 37 of the Free State Guideline Bylaw on Municipal Land Use Planning.
Subdivision of Agricultural Land Act, No. 70 of 1970	Possible applicability in terms of route for evacuation power lines and tie-in to substation.
Tokologo Municipal Land Use By-law	Rezoning application must be lodged in terms of the Municipal Land Use Planning By-law of the applicable municipality (e-lodgement)
Occupational Health and Safety Act, No. 85 of 1993 and Construction Regulations (2003)	Adherence to Health and Safety requirements and construction regulations during project development and operation.
Hazardous Substances Act, No. 15 of 1973	Adherence to legal requirements during construction, operation and maintenance.
Promotion of Administrative Justice Act, No. 3 Of 2000	Transparent and fair public participation process for proposed development.
Constitution of the Republic of South Africa Act, No. 108 of 1996	Adherence to Section 24 (environmental rights and responsibilities)
Electricity Act, No. 41 of 1987 and Electricity Regulation Amendments (2009)	Compliance with requirements to tie-in to the national grid.
Integrated Resource Plan (IRP) for South Africa (2010)	The proposed development will form part of the Renewable Energy Independent Power Producers Procurement Process (REIPPPP) bidding window 5.
Energy Efficiency Strategy of the Republic of South Africa (2005)	Laid the foundation for the IRP (2010) and need to shift towards renewable energy in the country's energy mix.
United Nations Framework Convention on Climate Change (1992)	Promotion of a move away from a coal-based energy supply to a more sustainable one (renewable energy) such as the proposed development.
Kyoto Protocol (1997)	South Africa acceded to the Protocol in 2002

7. ALTERNATIVES

7.1.1. Location Alternative:

In terms of location, only one development site on the Farm Visserspan No. 40 has been considered for the Proposed Solar PV Facility Project 3, due to its strategic placement and availability for lease within REDZ 5.

It should be noted that the proponent has proposed a total of four solar PV developments on the Farm Visserspan No. 40. However, each proposed facility is being treated as an independent environmental authorisation application with its own impact assessment process. Each of the four proposed Visserspan solar PV facilities differs in generation capacity, footprint size and environmental parameters/constraints, and provided environmental authorisation is received, will be bid as an independent facility in the next REIPPPP (bidding round 5) which is expected to take place later in 2020.

7.1.2. Activity Alternative:

With regards to potential activity alternatives, the primary activity proposed is *the development of facilities or infrastructure for the generation of electricity from a renewable resource where-*

- (i) the electricity output is more than 10 megawatts (MWs) but less than 20MWs; or*
- (ii) the output is 10MWs or less but the total extent of the facility covers an area in excess of 1 hectare (ha);*

provide electricity from a renewable energy source. There are no cellular network coverage alternatives since this is the only activity that can increase the specific ICT coverage required for the area.

7.1.3. Design/Technology Alternative:

The proponent, who has successfully developed smaller solar PV facilities in the Northern and Western Cape Provinces, always considers at least three possible technology alternatives for any potential solar PV development they undertake viz. a concentrated solar PV (CPV) facility, a crystalline PV facility and a thin film PV cell plant.

An analysis of the three alternate technologies is presented below and is further summarised in detail, in Table 1 - Comparison of Alternate Solar PV technologies:

Analysis of solar PV technology alternatives for Visserspan Solar PV Facility:

Solar PV systems and solar CPV systems differ only in the mechanics by which the cells making up the respective systems, capture and convert sunlight into direct current (DC) electricity.

PV systems come in three broad categories of cell type: mono-crystalline, poly-crystalline and thin film. The active panels are large and virtually the whole surface area is made up of PV cells.

In contrast, in CPV systems, the so-called 'multi-junction' cells are small (10mm x 10mm or smaller) and sunlight is focused onto these cells by some form of lens. The active 'multi-junction' cell material thus only constitutes a small fraction of the surface area of the CPV system.

Mono- and poly-crystalline systems differ only in the manufacture of the silicon wafers used as the basic building blocks of the PV cell. In the case of mono-crystalline cells, as the name suggests, large single crystals of quartz are grown and then cut into thin quartz wafers. In the case of poly-crystalline cells, multiple interlocking quartz crystals are grown and then cut into thin wafers, with each wafer having multiple (poly = many) quartz crystals. The performance of both mono- and poly-crystalline PV panels is very similar with actual performance output linked more to the quality of the quartz and the manufacturing process than to whether they are mono- or poly-crystalline. Both versions of crystalline PV are currently the most widely deployed and tested PV systems, globally.

There are a number of different varieties of thin film PV cells available. In all cases, various thin layers of material are coated on an appropriate substrate that is often glass. The main variants include amorphous silica (a-Si), Cadmium telluride (CdTe) or Copper Indium Gallium Selenide (CIGS). Thin film PV is generally less efficient at converting sunlight into electricity than crystalline PV but is it also generally less expensive to manufacture. In addition, it has a lower temperature degradation efficiency than crystalline PV.

In both PV and CPV systems, once sunlight has been converted into dc electricity, the so-called 'balance-of-systems' are essentially identical. Inverters convert the electricity from DC to alternating current (AC) and step-up transformers increase the voltage to the appropriate level to facilitate connection, or tie-in, to the national grid (typically, 11-22kVA).

In choosing which solar PV technology is most appropriate for a particular site or project, a number of factors come into play, many of which have as much to do with external socio-economic benefits, as they do with technical efficiencies. EIA studies on potential solar sites should, as a matter of course, look at the impacts of all variants of solar PV technologies as the eventual choice of technology is very often driven by the external factor of funder risk-preference/perception.

Table 1 below, outlines some of the factors that must be considered when making the final decision as to which of the solar PV technologies to use on a specific site, for a specific project.

Factor	Thin film PV	Crystalline PV	CPV	Comments
Direct Normal Irradiation (DNI)	Less appropriate	Less appropriate	More appropriate	CPV systems rely on DNI. There is a requirement for the system to be at right angles to the incoming radiation in order to focus the energy on the multi-junction cell.
Global Horizontal Irradiation (GHI)	More appropriate	More appropriate	Not appropriate	GHI is more appropriate to PV systems as they are able to make use of both direct, as well as scattered and reflected sunlight (no focussing is required).
Cloud Cover	Reduced output	Reduced output	Major reduction in output	CPV systems are far more sensitive to cloud cover than PV systems and output is severely reduced.
Temperature	Lower drop-off in performance with increasing temperature than crystalline PV	Significant drop-off in performance with increasing temperature	Lowest drop-off in performance with increasing temperature than crystalline PV	Electricity output may decrease by as much as 10% in high temperature environments for PV systems. Thin film systems perform better than crystalline systems at high temperature and CPV systems perform the best (least reduction in output).
Space Efficiency	> 2ha/MW	+/- 2ha/MW	< 2ha/MW	Space requirements per MW are thin film PV > crystalline PV > CPV.

Fixed Tilt Possible	Yes	Yes	Yes	PV systems are most commonly installed as fixed-tilt systems, with the optimum tilt angle a function of latitude. CPV systems have to have two-axis tracking in order to remain at right angles to the incident radiation.
Single Axis Tracking Possible	Yes	Yes	No	PV systems are frequently installed on single axis tracking systems, particularly when space is at a premium. As above, CPV cannot operate other than with a dual axis tracking system.
Dual Axis Tracking Possible	Yes	Yes	Yes, essential	Dual axis tracking is essential for CPV systems. It is also available for PV systems but is not essential and is not as common as fixed-tilt or single axis tracking. When used for PV systems, the economics of the added efficiency need to be weighed up against the additional cost and the increased operating and maintenance costs and complexity.
Output per Installed MW	Function of cell efficiency and GHI	Function of cell efficiency and GHI	Function of cell efficiency and DNI	Output for CPV in high DNI areas (i.e. few cloudy days) is generally much higher (+ 30%) than for fixed-tilt PV. This difference is obviously less pronounced when comparing CPV to dual axis tracking PV. However, dual axis tracking PV is not common and is often an 'add-on', whereas in CPV systems it is integral to the system
Cost per Installed MW (AC)	\$1.60-\$2.10	\$1.80-\$2.10	\$2.40-\$3.00	These are indicative prices for full turnkey costs including grid connections costs in the current South African market. These prices are for AC MW delivered to the national grid buzz bars.
Solar Market Share	< 5%	> 95%	> 0.1%	PV, with CPV representing about 0.1%, dominates the current world market share. This is likely to change in the future and the figure to watch is the new-market share, rather than basing figures on the existing installed base.
Ease of Financing	Less easy	Easy	Difficult	PV is extremely well established and has a proven track record. It is thus easy to finance, both from a debt and equity perspective. CPV, on the other hand, is an emerging technology, with a

				shorter track record and is accordingly generally more difficult to finance.
Job Creation	Reasonable during construction, low during operation	Reasonable during construction, low during operation	Reasonable during construction, low during operation	Both PV and CPV will create a fair number of jobs during the construction phase, with PV most likely creating more jobs than CPV, albeit of a lower-skilled nature. Neither PV nor CPV will create many operational jobs, with the jobs created by CPV exceeding those created by PV (more complex systems requiring more maintenance).
Local Manufacturing Job Creation	Limited, unless large pipeline of MW available to single manufacturer	Limited, unless large pipeline of MW available to single manufacturer	Good potential	The nature of CPV systems more or less dictate a large component of local manufacture. The lenses that focus the sunlight are located some distance from the multi-junction cells and are installed in a metallic box-like structure that is neither practical nor economic to transport long distances. CPV manufacturing facilities can be economically justified on modest production pipelines that are an order of magnitude less than the equivalent PV pipelines required to localise manufacture.
Ground Cover and Shading	Extensive, fixed	Extensive, fixed	Minimum, variable	Fixed-tilt, ground-mounted PV systems feature blanket ground cover and shading with some relief from spacing between rows of panels. CPV systems are generally pedestal-mounted and have moving shading patterns as they track the sun. CPV systems thus have a very small ground footprint.
Topographic Conditions	Flat ground preferred	Flat ground preferred	Flat ground preferred	Both PV and CPV systems are most easily constructed on flat ground. CPV systems are, however, more easily adapted to gently undulating topography than PV systems due to their pedestal versus rack mounting.
Visual Impacts	Low	Low	Medium	Ground-mounted fixed-tilt PV systems have a low visual impact and if necessary can be hidden by suitable screens or walls. Most CPV systems are visually more conspicuous (generally much higher structures).

Table 1 – Comparison of Alternative Solar PV technologies

Alternative 1 (Preferred Alternative) – Poly-crystalline Solar PV Modules

The preferred technology in this application is the solar poly-crystalline PV module, on a ground mounted, single axis tracking system. Refer to Table 1 – Comparison of Alternate Solar PV technologies. This alternative also has the least impact in terms of the screening tool themes in the DEFF Screening Tool Report (as per Appendix H):

The property belongs to the Bredenkamp Familie Trust (TMP 2131/1992) and comprises approximately 1275.4069ha in total. The nature of the site required for renewable energy generation projects often means that topographically, not many site alternatives are possible. Roughly 1000ha of the Farm Visserspan No. 40 was taken into account and the most suitable portion of 222ha for Visserspan Solar PV Facility – Project 3, was identified with regards to the following specifications:

- **Size:** 222ha development footprint area required
- **Landowner consent:** The Bredenkamp Familie Trust (TMP 2131/1992) has provided consent
- **Available access:** The site can be accessed from the R64, using existing secondary roads viz. the 31999. However, additional access roads will have to be established on site.
- **Locality to nearest tie-in to the national electricity grid:** The Eskom (Perseus) electricity sub-station is approximately 3,5km south of the site for easy connectivity.
- **Topography:** The proposed site is located on an almost level area. With a small hill towards the south west but this area is a no-go area due to the *Acacia spp.* present.
- **Agricultural Potential:** Refer to Appendix G4 (Soil, Land Use and Agricultural Potential Survey). The site has a low dryland cropping agricultural potential more suited to grazing.
- **Biodiversity:** The dominant vegetation type found on Visserspan Farm No. 40 is Vaal-Vet Sandy Grassland, an endangered (A1) vegetation type (Government Gazette, 2011). The proposed development would result in a high local loss of this vegetation type (habitat) and loss of ecological functionality. Mitigation options are minimal to zero and the impact at a local scale is thus **High Negative**. However, since the Vaal-Vet Sandy Grassland is an extensive system and not confined to Visserspan, the cumulative impact would be **Low Negative** and loss of resources would be low, particularly when considering the grazing and other pressures the land is subject to. Owing to the widespread occurrence of the principal vegetation type, Vaal-Vet Sandy Grassland, the

botanical specialist holds the view that Vaal-Vet Sandy Grassland is not sensitive at Visserspan. The classification of areas as CBAs and ESAs on the farm was also questioned and it was stated that the ESAs and degraded areas are incorrectly mapped. Consequently, the development of the Solar PV Project 1 at Visserspan is supported from a botanical (vegetation) perspective.

- **Freshwater:** There are no watercourses on the proposed development site for Visserspan Solar PV Facility – Project 3.
- **Archaeological:** No objections on archaeological grounds to the proposed development being authorised. Refer to Appendix G3a.
- **Palaeontological:** No objections on archaeological grounds to the proposed development being authorised. Refer to Appendix G3b.
- **Visual:** The proposed site is situated in a rural area with some natural trees and cultivated alien invasive (*Eucalyptus spp.*) trees. The area displays a rural character with low intensity farming, game farming and natural around further east on the farm. The Eskom (Perseus) substation is in close proximity to the site and an HV power line servitude runs to the east of the Farm Visserspan No. 40 towards Perseus substation in the south. Due to the topography, slope of land and the lower height (maximum of 3m above ground level), the overall visual impact has been rated as low. Refer to the Visual Impact Assessment (as per Appendix G3c) and particularly the simulated pictures of the proposed development on site as viewed from different view receptors.

Alternative 2 (Not Preferred Alternative) – Concentrated PV System

The solar PV technology initially assessed due to its high output during direct normal irradiation (DNI) was the concentrated PV system (CPV). However, the cost to develop such a plant as well as the visual and sense of place aspects the solar crystalline PV system primarily due to a reduction in the cost of PV when compared to CPV. In addition, the proponent's experience was that financiers were more comfortable with investing in the more established solar poly-crystalline PV system than in CPV. Refer to Table 1 – Comparison of Alternate Solar PV technologies.

Alternative 3 (Not Preferred Alternative) – Thin film PV Cells

The least preferred technology considered was thin film PV cells. It is least preferred due to all the reasons detailed in Table 1 below (Comparison of Alternate Solar PV technologies)

7.1.4. Layout Alternative:

Only concept layout drawings were available at the time of compilation of the DBAR. However, adjustments in the layout to accommodate buffers/setback areas, as well as placement of the infrastructural requirements and structures/buildings within the proposed development footprint, will be made.

7.1.5. No-go Alternative:

The no-go alternative will not result in any removal of vegetation or impacts on biodiversity (flora or faunal) or loss of agricultural land since the development will not take place. In addition, the designated CBAs and ESAs will be able to function unhindered. However, this does not guarantee that the ecosystem will revive or thrive since the area is used for grazing and parts of the farm are quite degraded.

The no-go alternative will also result in South Africa's unsustainable, coal-based electricity supply will not be augmented with renewable energy alternatives.

Considering that this development is proposed to be part of the REIPPPP bidding process (Bid Window 5), Government's target of securing 17 800MW of renewable energy capacity by 2030, as well as the country's commitment to wider/global climate change issues will remain subordinate to other pressing challenges which our country faces.

Due to the nature of the activity, and the size and location of the site (located with an area specified by the Government for such developments), the socio-economic benefits of the activity for the wider national community are considered to greatly outweigh any environmental benefits of not implementing the activity.

The no-go alternative is, therefore, not advocated.

8. ASSESSMENT METHODOLOGY

Please refer to Appendix I for details on proposed project impact assessment methodology, as well as significance rating and mitigation measures.

9. ENVIRONMENTAL ISSUES AND POTENTIAL IMPACTS

According to the independent Visual Impact Assessment attached as Appendix G3c:

Actual and potential view receptors affected by this proposed development were identified. The impact of the proposed development on these receptors was evaluated and also considered the effect of the proposed development on the sense of place of the environment.

The site is located in a low structural density, rural area, and is currently the northern-most location for a solar PV plant in the Dealesville region. Several (at least 12) facilities have already been applied for and/or received approval between Dealesville and the proposed Visserspan Solar PV Facility - Project 3 development.

Due to the topography and landscape elements, the area displays a high absorption level. The assessment of the potential receptors indicated that the overall impact is low and well within acceptable levels of change.

While both the archaeological and palaeontological specialists had no objections to the proposed development being authorised (refer to Appendix G3a and G3b), using the precautionary principle, the possibility of any heritage related discovery during construction has been accommodated in the EMPr (attached as Appendix J), this is in line with the comment received from SAHRA in such cases. Comment on the Notice of Intent to develop (from SAHRA) is still forthcoming and will be included in Appendix E of the final BAR - Correspondence from Organs of State.

However, as a precautionary principle, the possibility of any heritage related discovery during construction has been accommodated in the EMPr (attached as Appendix J), in line with the preliminary and final comments to be received from SAHRA as per Appendix E attached (Correspondence from Organs of State).

10. PUBLIC PARTICIPATION PROCESS

As per the NEMA 2014 regulations (as amended), a comprehensive public participation process is required to inform interested and affected parties (I&APs) of the proposed development and alternatives.

Particulars of the public participation process conducted and still to be conducted, are summarised below:

i. Pre-application public participation (PP) process:

Placed advertisement in local newspapers regarding project, availability of copies of documents and process to register as an I&AP.

Sent out notifications to Interested and Affected Parties (I&APs) previously registered for projects in the areas (Organs of State; Forums; Community groups, etc.)

Placed A2 posters on site

Displayed and placed A3 posters, maildrop letters/background information document in public facilities (Municipality and large retail shops)

Displayed A3 posters at local public amenities (local clinic / bar)

Delivered maildrop letters to neighbouring properties / farms spaza shops

Made copies of PP associated documents available on EnviroAfrica website for public viewing / comment

Emailed, delivered or posted copies of any PP documentation to querying I&APs who requested them.

Compiled comments and response trail report as per Appendix F.

Updated I&AP List.

ii. Post-application PP process:

PP involving informing via email, posting of cd copies process for all registered I&APs for the post-application round of PP using draft BAR.

iii. Inform all registered I&APs of submission of final BAR as the third round of PP and availability on website using.

Await DEFF EA decision.

iv. Inform I&APs within 14 days of DEFF decision when received.

11. CONCLUSIONS

According to the BGIS maps in Appendix D, the site does fall within a CBA 1, as well as a degraded area and (incorrectly positioned on the BGIS map) an ESA. The botanical specialists' opinion after ground-truthing the BGIS maps differs with the CBA and ESA classification.

The botanical and freshwater specialists both confirm that the proposed footprint for Visserspan Solar PV Facility - Project 3 **does not** include or encroach on the ESA since the development footprint deliberately excludes the ESA/Central Pan with at least a 32m setback from the edge of the (known) riparian habitat of the pan. The development footprint for Visserspan Solar PV Facility – Project 3 is located on a relatively flat area within a rural region and the property is currently zoned 'Agricultural'.

Although the DEFF Screening Tool attached as Appendix H indicates that the area is of high animal species/biodiversity significance, it is evident that the proposed development site is, or was, transformed / disturbed land which is currently used for grazing.

From desktop studies, it seems that no endangered or threatened faunal species seem to be prevalent in the proposed development site. Nonetheless, the EMPr will require a search and rescue of any faunal and flora species as required by the environmental control officer or regulating authority during construction, should it be deemed necessary e.g. such as for tortoises and toads.

The land surrounding the proposed development site comprises a mix of land uses: agricultural land, Eskom high voltage power line servitudes, Perseus substation, farm workshops and scattered residences and further afield (not immediate neighbour/s) game farms.

Visserspan Solar PV Facility - Project 3 will be visible from particularly the 31999 (dirt/gravel) secondary or trunk road which runs to the east of the proposed development.

According to the independent Visual Impact Assessment report (attached as Appendix G3c): The undulating landscape and the low vertical extent of the planned infrastructure results in a low overall visual impact.

The small extent of the project in relation to the number of approved PV facilities as well as the fact that the site abuts the approved projects and is in close proximity to the Perseus substation, results in a low contribution to the cumulative impact with regards to crowding. Due to the low overall visual impact, no mitigation measures are required.

The notice of intent to develop (NID) will be submitted by the archaeological specialist for all heritage aspects, to the South African Heritage Resources Agency (SAHRA).

12. RECOMMENDATIONS

It is concluded that the palaeontological sensitivity of the four solar PV project areas on Farm Visserspan No. 40 near Dealesville is low. Anticipated impacts on local palaeontological heritage resources from the construction phase of the developments are accordingly also of LOW SIGNIFICANCE. This applies equally to all four of the proposed solar PV facilities whose cumulative impact significance would also be LOW. No further significant impacts are expected during the operational and decommissioning phases of the developments. There are no fatal flaws in the development proposals. Provided that the recommended mitigation measures outlined below and summarized in the Appendix are fully implemented, there are no objections on palaeontological heritage grounds to authorisation of the four PV solar facilities. The proposed associated grid connection to Eskom's Perseus substation has not been assessed here.

Should fossil remains such as bones, teeth, shells or petrified wood be discovered before or during the construction phase, these should be safeguarded (preferably *in situ*) and the ECO should alert the South African Heritage Resources Agency, SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Phone: +27 (0)21 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). This is so that appropriate mitigation (e.g. recording, sampling or collection) can be taken by a professional palaeontologist (See tabulated Chance Fossil Finds Procedure appended to this report). The specialist involved would require a collection permit from SAHRA. Fossil material must be curated in an approved repository (e.g. museum or university collection)

and all fieldwork and reports should meet the minimum standards for palaeontological impact studies developed by SAHRA (2013).

The various categories of heritage resources recognised as part of the National Estate in Section 3 of the National Heritage Resources Act (1999) include, among others:

- i. geological sites of scientific or cultural importance;
- ii. palaeontological sites;
- iii. palaeontological objects and material, meteorites and rare geological specimens.

According to Section 35 of the National Heritage Resources Act, dealing with archaeology, palaeontology and meteorites:

(1) The protection of archaeological and palaeontological sites and material and meteorites is the responsibility of a provincial heritage resources Agency.

(2) All archaeological objects, palaeontological material and meteorites are the property of the State.

(3) Any person who discovers archaeological or palaeontological objects or material or a meteorite in the course of development or agricultural activity must immediately report the find to the responsible heritage resources Agency, or to the nearest local Agency offices or museum, which must immediately notify such heritage resources Agency.

(4) No person may, without a permit issued by the responsible heritage resources Agency—

(a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;

(b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;

(c) trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or

(d) bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.

(5) When the responsible heritage resources Agency has reasonable cause to believe that any activity or development which will destroy, damage or alter any archaeological or palaeontological site is under way, and where no application for a permit has been submitted and no heritage resources management procedure in terms of section 38 has been followed, it may—

- (a) serve on the owner or occupier of the site or on the person undertaking such development an order for the development to cease immediately for such period as is specified in the order;
- (b) carry out an investigation for the purpose of obtaining information on whether or not an archaeological or palaeontological site exists and whether mitigation is necessary;
- (c) if mitigation is deemed by the SAHRA to be necessary, assist the person on whom the order has been served under paragraph (a) to apply for a permit as required in subsection (4); and
- (d) recover the costs of such investigation from the owner or occupier of the land on which it is believed an archaeological or palaeontological site is located or from the person proposing to undertake the development if no application for a permit is received within two weeks of the order being served.

It was concluded by the specialist that “the proposed development of a photovoltaic facility on the site will not have large impacts due to the low agricultural potential of the site as well as the rainfall that is below 500 mm pa.

Even though the soils on the site are not considered to be highly sensitive to erosion such prevention measures should be put in place due to the general slope of the site. The main impacts that have to be managed on the site during the construction activities are:

1. Erosion must be controlled through adequate mitigation and control structures.
2. Impacts from vehicles, such as spillages of oil and hydrocarbons, should be prevented and mitigated.
3. Dust generation on site should be mitigated and minimised as the dust can negatively affect the quality of grazing as well as livestock production.

All recommendations made in specialist reports and the EMPr (and the environmental authorisation, should it be granted) must be adhered to, in particular, but not limited to, ECO site compliance inspections/audits and reporting, during and post construction (detailed in section.

The above recommendations must be included in the Environmental Management Plan (EMP) for the proposed development.

It is, therefore, recommended that this application be authorised with the necessary conditions of approval as described throughout this BAR and associated EMPr.

13. APPENDICES

APPENDIX		TITLE	APPENDIX ATTACHED? YES
A		Locality Maps	DBAR, Vol. 1
B		Site Layout Plans	DBAR, Vol. 1
C		Site Photographs	DBAR, Vol. 1
D		Biodiversity/Sensitivity Maps	DBAR, Vol. 1
E		Correspondence from Organs of State	DBAR, Vol. 1
F		Comment and Response Report/s	DBAR, Vol. 1
	F1	Supporting Documents	DBAR, Vol. 1
	F2	Public Participation Proof	DBAR, Vol. 1
	F3	Interested and Affected Parties (I&AP) Lists	DBAR, Vol. 1
G		Specialist Studies	DBAR, Vol. 1
	G1	Botanical Impact Assessment	DBAR, Vol. 1
	G2	Freshwater Impact Assessment	DBAR, Vol. 1
	G3	Heritage Impact Assessment	DBAR, Vol. 1
	G3a	Archaeological Impact Assessment	DBAR, Vol. 1
	G3b	Palaeontological Impact Assessment	DBAR, Vol. 2
	G3c	Visual Impact Assessment	DBAR, Vol. 2
	G4	Soil, Land Use and Agricultural Potential Survey	DBAR, Vol. 2
	G5	Socio-economic Report	DBAR, Vol. 2
H		Screening Tool Report	DBAR, Vol. 2
I		Impact Assessment	DBAR, Vol. 2
J		Environmental Management Programme/Plan (EMPr)	DBAR, Vol. 2
K		Property Owner's Consent	DBAR, Vol. 2
L		Specialists' Declarations	DBAR, Vol. 2
M		EAP's Declaration	DBAR, Vol. 2
N		Applicant's Declaration	DBAR, Vol. 2