



25 August 2020

Ms Vivienne Thomson
EnviroAfrica CC
P.O. Box 5367
Helderberg
7135

Dear Vivienne,

COMMENT ON TWO LETTERS FROM THE DEPARTMENT OF ENVIRONMENT, FORESTRY AND FISHERIES REGARDING APPLICATIONS FOR TWO PHOTOVOLTAIC RENEWABLE ENERGY FACILITIES AT VISSERSPAN, NEAR DEALESVILLE, FREE STATE PROVINCE.

Two letters from the Department of Environment, Forestry and Fisheries, Directorate Biodiversity Conservation, both Ref. 14/12/16/3/3/1/2/2154 dated 24 August 2020, concerning the proposed Visserspan Solar PV1 and Solar PV2 projects, have been referred to me as the Specialist Botanist for comment.

In the first (Visserspan Solar PV1) letter, the point I made was that “although the study area is in an area classified and mapped as a CBA1, my findings were that there area does not warrant CBA status and is suitable for building a solar PV installation”. It is acknowledged that Vaal-Vet Sandy Grassland is Endangered A1 but this is largely due to loss to agriculture, poor land management and to a large extent overgrazing. My view is that the CBA1 classification is too broad and that at a ‘LOCAL SCALE’, some 80 ha would be affected by the proposed solar installation. However, the **cumulative impact** due to this activity is, and would in future be, far outstripped by further **agricultural** development and in particular overgrazing. This is at a far more significant ‘LARGER SCALE’. I thus do not believe that a relatively small area (in comparison with the remaining extent of Vaal-Vet Sandy Grassland) would be of a magnitude that would make a large contribution to the loss of this habitat type overall. I also do not believe that since an area is classified as a CBA1, it should by default be excluded from any further development. The CBA1 classification should also not be confused with necessarily being ‘highly sensitive’. Agricultural practices will continue with attendant land degradation and it is there that emphasis should be placed to rectify and enhance the status of the remaining Vaal-Vet Sandy Grassland. My view is thus that I disagree that the Visserspan Solar PV1 would result in a fatal flaw. That is far too harsh a conclusion.

In the second letter, the point revolves around the mitigation hierarchy i.e. to avoid, minimize, rectify, reduce and if necessary, offset. It is admitted that there would be unavoidable loss of habitat due to the construction of Solar PV2. However, this loss would be confined to the footprint and would not result in the loss of all the grassland habitat in the intervening areas. These areas will still function ecologically and the suggestion that there will be a ‘high’ loss of Vaal-Vet Sandy Grassland is an overstatement in the broad sense. The high loss would be confined to the Solar PV footprint. Once again, cumulatively, the loss would be small with respect to the extent of the vegetation type as a whole. Although it has been stated that mitigation measures would be ‘minimal to zero’, this applies to the immediate footprint of the Solar PV installation.



In conclusion, it is my view that neither the Solar PV1 nor the Solar PV2 would have such a negative impact so as to consider their construction and consequent loss of habitat to be a 'fatal flaw'.

By definition, **Residual Impacts** are derived by 'comparing the predicted impact to the best effect that the mitigation measures can have in alleviating the adverse effect that the identified impact can have on the environment'. My understanding of the ecosystem at Visserspan is that the residual impacts would be acceptable if good land management is practiced in the area of the farm where the Solar PV installations would not be constructed. This would offset the negative impacts and emphasize again that I do not agree that the projects would be fatally flawed.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D.J. McDonald', with a horizontal line underneath the name.

Dr D.J. McDonald Pr Sci Nat
Director; Botanical Specialist

