

DRAFT BASIC ASSESSMENT REPORT: Basic Assessment for the Proposed Development of Electrical Grid Infrastructure to support the proposed nine 175 MW Solar Photovoltaic Facilities and associated Infrastructure (i.e. Witte Wall PV 1, Witte Wall PV 2, Grootfontein PV 1, Grootfontein PV 2, Grootfontein PV 3, Hoek Doornen PV 1, Hoek Doornen PV 3, and Hoek Doornen PV 4), near Touws River, Western Cape

Appendix C.9: Civil Aviation Site Sensitivity Verification

1. Introduction

This report serves as the Site Sensitivity Verification for Civil Aviation for the Basic Assessment (BA) for the proposed development of Electrical Grid Infrastructure (EGI) to support the proposed nine 175 MW Solar Photovoltaic (PV) Facilities and associated Infrastructure (i.e. Witte Wall PV 1, Witte Wall PV 2, Grootfontein PV 1, Grootfontein PV 2, Grootfontein PV 3, Hoek Doornen PV 1, Hoek Doornen PV 2, Hoek Doornen PV 3, and Hoek Doornen PV 4), near Touws River, Western Cape. The projects are being proposed by Veroniva (PTY) Ltd, and forms part of a cluster of nine Solar PV Facilities and associated infrastructure.

2. Need for the Site Sensitivity Verification

On 20 March 2020, in Government Gazette 43110, Government Notice (GN) 320, the Department of Environment, Forestry and Fisheries (DEFF) published procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) when applying for an Environmental Authorisation (EA). GN 320 prescribes general requirements for undertaking Site Sensitivity Verification, as well as protocols for assessment and minimum report content requirements of environmental impacts associated with specified environmental themes for activities requiring EA. GN 320 was enforced within 50 days of publication of the notice i.e. on 9 May 2020.

GN 320 specifically includes a protocol that provides the criteria for the specialist assessment and minimum report content requirements for impacts on civil aviation installations for activities requiring EA. This protocol replaces the requirements of Appendix 6 of the 2014 NEMA Environmental Impact Assessment (EIA) Regulations (as amended).

This specific protocol states that proposed developments that occur on sites identified as Very High, High or Medium sensitivity, as depicted on the National Web-Based Environmental Screening Tool (Screening Tool), must include a Civil Aviation Compliance Statement. It further states that there are no requirements if the proposed developments occur on sites identified as Low sensitivity on the Screening Tool. However, a Site Sensitivity Verification is required for the Civil Aviation Protocol.

Therefore, since the proposed EGI projects require an EA in terms of the 2014 NEMA EIA Regulations (as amended), and Civil Aviation was identified as a relevant theme for the General Methodology on the Screening Tool, as well as a required study, GN 320 must be complied with.

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3. Methodology

The Site Sensitivity Verification Process and Report has been compiled based on the following methodology:

- Existing spatial databases were used to determine the location of civil aviation installations in relation to the proposed project area, and to identify preliminary areas of concern in terms of impacts to civil aviation installations;
- The proposed project sites and footprints were plotted on the Screening Tool to identify the sensitivity allocated;
- A site visit was undertaken to confirm the current land use and the environmental sensitivity as it relates to Civil Aviation:
- Additional research was undertaken to substantiate the Site Sensitivity Verification process;
 and
- A Site Sensitivity Verification Report was compiled (i.e. this report).

The information sources listed in Table 1 were used in the Site Sensitivity Verification process.

Table 1: Information Sources used for the Site Sensitivity Verification process

Data / Information	Source	Date	Туре	Description
National Web-Based	Department of	2020	Spatial / Online	The Screening Tool is a geographically based web-
Environmental	Environment,		Assessment	enabled application which allows a proponent
Screening Tool	Forestry and			intending to submit an Application for EA in terms of
(Screening Tool)	Fisheries (DEFF)			the 2014 NEMA EIA Regulations (as amended) to
				screen the proposed site for any environmental
				sensitivity ¹ .
RSA Airspaces in 3D	Air Traffic and	2020	Google Earth	The RSA Airspaces in 3D data KMZ file is an
	Navigation		KMZ File	initiative undertaken by the ATNS to illustrate the
	Services SOC			definitions and complexities of airspace, routes,
	Limited (ATNS)			aerodromes and navigational facilities within South
				Africa to the public in the interest of safety ² .
Airport, Airfields and	Civil Aviation	2018	Spatial Vector	Location of airfields in RSA.
Obstacle Datasets [Note	Authority (CAA)		Dataset	
that this dataset was				
used in the Visual				
Impact Assessment				
undertaken for the				
proposed project] Wind and Solar PV	Department of	2015	Donort	SEA commissioned by the DEA [now operating as
Phase 1 Strategic	Department of Environmental	2015	Report	the DEFF) in 2013 for an assessment of wind and
Environmental	Affairs (DEA)			solar PV energy in South Africa, with an aim of
Assessment (SEA)	Alialis (DLA)			identifying eight Renewable Energy Development
, toodoomont (OL/1)				Zones (REDZs) to focus and incentivize such
				development (i.e. Phase 1 REDZs SEA: CSIR
				Report Number: CSIR/CAS/EMS/ER/2015/0001/B).
Wind and Solar PV	DEFF	2019	Report	SEA commissioned by the DEFF in 2016 for an
Phase 2 SEA			'	assessment of wind and solar PV energy in South
				Africa, with an aim of identifying three additional
				REDZs to focus and incentivize such development

¹ https://screening.environment.gov.za/screeningtool/index.html#/pages/welcome

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² https://www.atns.co.za/rsakmz.php

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Data / Information Source		Date	Туре	Description		
						(i.e. Phase 2 REDZ SEA. CSIR Report Number:
						CSIR/SPLA/SECO/ER/2019/0085).
Visual	Impact	Quinton	Lawson	2020	Report	This Visual Impact Assessment was commissioned
Assessment	for the	and	Bernard			for the proposed project.
proposed projects Oberholzer,						
		QARC ar	d BOLA			

Therefore, the Site Sensitivity Verification was undertaken using desktop analysis, satellite imagery, preliminary on-site inspection, and other available and relevant information.

4. Proposed Project Location

The proposed projects are located entirely within the Komsberg Renewable Energy Development Zone (REDZ 2), one of the eight REDZs formally gazetted in South Africa for the purpose of developing solar and wind energy generation facilities (GN 114; 16 February 2018). The proposed EGI projects, which include power lines and on-site substations to support the nine solar PV projects, are located on the properties indicated in Table 2.

Table 2: Property Details for the proposed EGI Project

Project Name	Project Applicant	Affected Farm Portions	21 Digit Surveyor General
		(EGI)	(SG) Code
Witte Wall PV 1	Witte Wall PV 1 (PTY) LTD	Witte Wall RE/171	• C0190000000017100000
Witte Wall PV 2	Witte Wall PV 2 (PTY) LTD	Die Brak RE/241Platfontein RE/240	• C0190000000024000000 • C01900000000024100000
Grootfontein PV 1	Grootfontein PV 1 (PTY) LTD	Grootfontein RE/149Grootfontein 5/149	C0190000000014900000C0190000000014900005
Grootfontein PV 2	Grootfontein PV 2 (PTY) LTD	Hoek Doornen 1/172Witte Wall RE/171	• C0190000000017200001 • C01900000000017100000
Grootfontein PV 3	Grootfontein PV 3 (PTY) LTD	Die Brak RE/241Platfontein RE/240	• C0190000000024100000 • C0190000000024000000
Hoek Doornen PV 1	Hoek Doornen PV 1 (PTY) LTD	Hoek Doornen 1/172	• C0190000000017200001
Hoek Doornen PV 2	Hoek Doornen PV 2 (PTY) LTD	Witte Wall RE/171	• C0190000000017100000
Hoek Doornen PV 3	Hoek Doornen PV 3 (PTY) LTD	Die Brak RE/241	• C0190000000024100000
Hoek Doornen PV 4	Hoek Doornen PV 4 (PTY) LTD	Platfontein RE/240	• C0190000000024000000

5. Details of the Environmental Assessment Practitioner

GN 320 states that prior to commencing with a specialist assessment, the current use of the land and the potential environmental sensitivity of the site under consideration as identified by the screening tool must be confirmed by undertaking a Site Sensitivity Verification. GN 320 further notes that the Site Sensitivity Verification must be undertaken by an Environmental Assessment Practitioner (EAP) or specialist with expertise in radar.

This Site Sensitivity Verification has been undertaken by Lizande Kellerman, an EAP at the CSIR. Lizande Kellerman is registered with the South African Council for Natural and Scientific Professions (SACNASP), with Registration Number 400076/10 in the field of Botanical Sciences. Inputs to the Site Sensitivity Verification Report were provided by Luanita Snyman-van der Walt and Rohaida Abed of the CSIR.

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6. Findings of the Screening Tool

A Screening Tool Report was generated for the proposed EGI project using the following classification: Utilities Infrastructure → Electricity → Distribution and Transmission → Powerline → Powerline

The map of civil aviation combined sensitivity generated and included in the Screening Tool depicted that the EGI project corridor to support the nine PV facilities is located in a low sensitivity area from a civil aviation perspective i.e. there are no major or other types of civil aviation aerodromes or buffers that intersect with the project footprint (Figure 1). Only a small part of the EGI corridor in the extreme south, in the vicinity of the Eskom Kappa Substation, falls within a medium sensitivity area. The medium sensitivity area is based on the following trigger:

 Other Civil Aviation Aerodome 8 and 15 km buffer in relation to commercial scale wind energy installations.

However, based on the descriptions and motivations provided below, the proposed power lines will fall within an area of low sensitivity in terms of civil aviation.

Therefore, in terms of GN 320, this means that no further requirements are applicable i.e. a Compliance Statement is not required, if the site is indeed found to be of low sensitivity during the site visit.

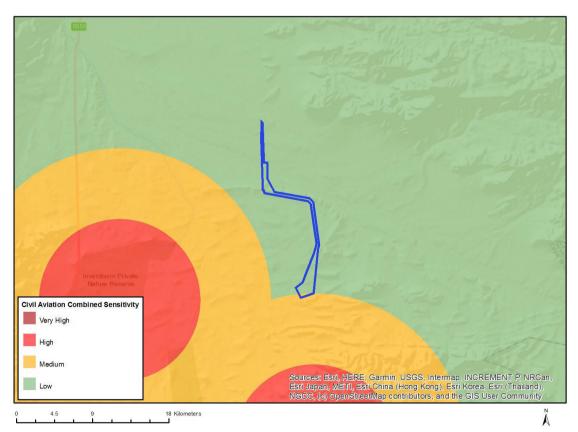


Figure 1: Screening Tool Map showing the EGI Corridor in terms of Civil Aviation Sensitivity.

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7. Details of the Site Visit

The details of the site visit are noted below:

Date of Site Visit	15 – 16 October 2020
Specialist Name	Lizande Kellerman (EAP)
Professional Registration Number	SACNASP Reg, No. 400076/10
Specialist Affiliation / Company	CSIR

8. Findings

The site visit confirmed that the Witte Wall Farm is currently used for game farming (i.e. Wittewal Game Farm); and the Grootfontein and Hoek Doornen Farms currently do not have any agricultural activity but were historically used for sheep grazing. The Platfontein Farm contains the Eskom Kappa Substation and various transmission lines. The landowner has also confirmed that according to their records, the rest of the farm is unutilized. Historically, the Die Brak Farm was also used for sheep farming, and currently includes a farmstead and various transmission lines transecting the landscape.

No civil aviation installations were found within the proposed project footprint for the proposed EGI project. The area is arid and typified by short karroid shrubland vegetation characteristic of the Succulent Karoo Biome. Refer to Figures 2 and 16 for views of the affected farm portions, on which the proposed EGI project will take place.



Figure 2: View from the R356 towards the Farm Witte Wall (E direction) with the Perdekraal East Wind Energy Facility visible on the horizon (Photo: L. Kellerman)



Figure 3: View from Witte Wall towards Die Brak Farm (SE direction) (Photo: L. Kellerman)



Figure 4: View from the R356 towards Grootfontein Farm (NE direction) (Photo: L. Kellerman)



Figure 5: View from the R356 towards Grootfontein Farm (E direction) (Photo: L. Kellerman)



Figure 6: View from R356 towards Hoek Doornen Farm (NE direction) (Photo: L. Kellerman)



Figure 7: View from R356 towards Hoek Doornen Farm (SE direction) (Photo: L. Kellerman)



Figure 8: View from Hoek Doornen Farm towards the adjacent Grootfontein Farm (NE direction) (Photo: L. Kellerman)



Figure 9: View from Hoek Doornen Farm towards the Sadawa Game Reserve (SE direction) (Photo: L. Kellerman)



Figure 10: Official entrance to the Eskom Kappa Substation on the Platfontein Farm (Photo: L. Kellerman)



Figure 11: South entrance gate to the Eskom Kappa Substation on the Platfontein Farm along the Patatsrivier/Matjiesfontein Road (DR1475) (Photo: L. Kellerman)



Figure 12: View of the northern side of the Eskom Kappa Substation on the Platfontein Farm (Photo: L. Kellerman)



Figure 13: View of the power lines routed via the Eskom Kappa Substation on the Platfontein Farm (NW direction) (Photo: L. Kellerman)



Figure 14: View of the power lines routed via the Eskom Kappa Substation on the Platfontein Farm (Photo: L. Kellerman)



Figure 15: View of existing power lines on Die Brak Farm (Photo: L. Kellerman)



Figure 16: View of the proposed EGI corridor on Die Brak Farm (Photo: L. Kellerman)

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However, there is an airstrip and helicopter landing pad at the Sadawa Game Reserve (21 Digit SG Code: C01900000000047700000), which is located about 8 to 15 km away from the EGI corridor. The airstrip and helicopter landing pad are only occasionally used for small aircraft (and scraped down before use only when required). The landing strip is approximately 1.3 km long and oriented NW-SE. Figures 17, 18 and 19 below show the airstrip and helicopter landing pad. The location of this private landing strip, potentially due to its small scale, is not shown on the Screening Tool. The Visual Impact Assessment undertaken for the proposed project has confirmed that the Sadawa airstrip is located away from the proposed project sites and outside of the high sensitivity areas allocated in the Visual Impact Assessment.



Figure 17: Sadawa Game Reserve helicopter landing pad (Photo: L. Kellerman)



Figure 18: Sadawa Game Reserve airstrip (view in NW direction) (Photo: L. Kellerman)



Figure 19: Sadawa Game Reserve airstrip (view in SE direction) (Photo: L. Kellerman)

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The Inverdoorn Private Nature reserve is also located more than 10 km to the south-west of the proposed EGI sites. Research and discussions with local landowners have indicated that the Inverdoorn Private Nature Reserve also has a landing strip. The location of the landing strip is shown on the Screening Tool; however, the actual civil aviation installation and its associated buffers do not fall within the proposed EGI project sites.

Research has also indicated that the Rooikoppies airfield³ is located near Touwsrivier, more than 25 km away from the proposed project sites, on the southern side of the Bontberg mountains.

The ATNS data has confirmed that there are two unlicensed aerodomes outside of the 30 km radius of the proposed project sites. The ATNS data further notes that Area Navigation Routes and Conventional Routes associated with the Cape Town International Airport Airspace intersect with the 30 km radius of the project area. However, the proposed power lines will range to a maximum height of 30 m from ground level, and is thus not likely to impact negatively on civil aviation installations or air traffic associated with the Cape Town International Airport.

The ATNS data also indicates the location of the Touws River Weapons Training area, which is classified as restricted airspace, located more than 25 km to the south-west of the project sites. Based on the location, it will not be impacted on by the proposed solar PV projects.

It must also be noted that there are various existing power lines on the Farms Die Brak and Platfontein. As noted above, the Kappa Substation is also located on the latter farm. This is clearly depicted in Figures 10 to 16. Therefore, the proposed power lines will be installed in an area that has already been impacted by power lines and the substation, which currently do not pose a risk to the civil aviation installations or air traffic associated with the Cape Town International Airport.

Furthermore, the proposed power lines terminate at the Eskom Kappa substation, which itself is at the edge of the **medium** sensitivity in the Screening Tool, amongst other existing high-voltage power lines. The medium sensitivity appears to be associated with the Rooikoppies airfield near Touwsrivier, which is located a significant distance away from the proposed projects, as noted above. Furthermore, the final power line routes will terminate at the Eskom Kappa Substation, which itself falls outside of the medium sensitivity area. Therefore, based on this, the sensitivity of the Kappa substation area where the power lines are proposed to terminate is verified as **low**, as it relates to civil aviation. Refer to Figures 20 and 21 for additional information.

³ https://mapcarta.com/14265164

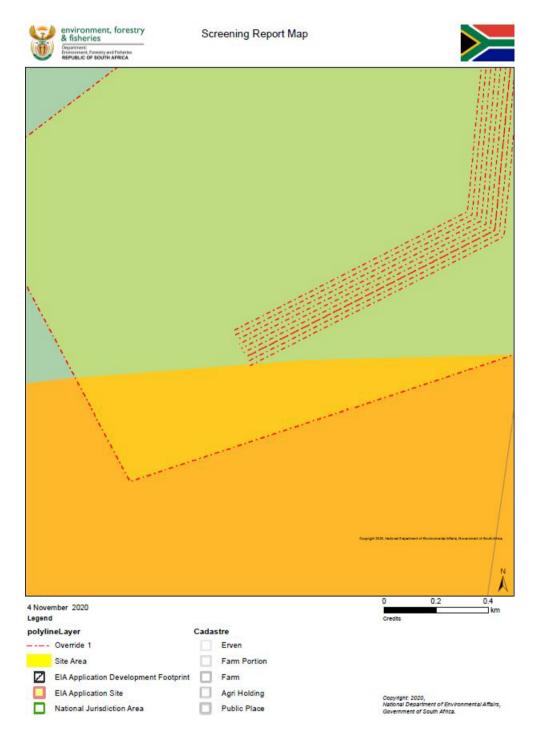


Figure 20: Screening Tool Map of the Civil Aviation Combined Sensitivity showing a zoomed in perspective of the EGI corridor and the proposed power lines.

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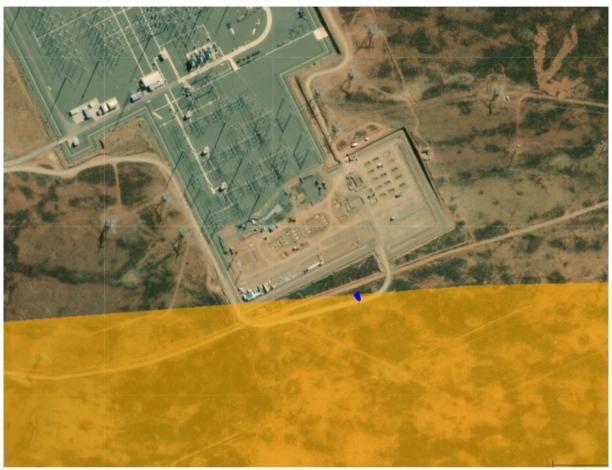


Figure 21: Aerial photograph of the Eskom Kappa Substation in relation to the Civil Aviation Combined Sensitivity Layer on the Screening Tool. It is clear that the Eskom Kappa Substation falls outside of the medium sensitivity area (i.e. in a low sensitivity area), and thus the proposed power lines will also fall within the low sensitivity area.

Furthermore, the Screening Tool uses the wind energy sensitivities for power lines, and the actual power lines will only be 30 m high (as opposed to wind turbines with a hub height of approximately 120 m). Therefore, the sensitivity and impact of power lines is expected to be much lower.

Most of the features noted above are in line with the findings of the Phase 1 and Phase 2 Wind and Solar SEA Reports.

Figure 22 indicates the location of the civil aviation features noted above, which informed this Site Sensitivity Verification.

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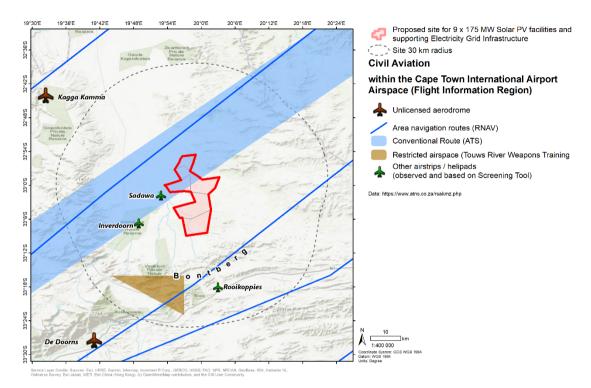


Figure 22: Civil Aviation Features relative to the proposed project sites based on the site visit and existing databases.

9. Concluding Statement

The proposed project sites were determined and verified to be of low sensitivity (as it relates to civil aviation). This was determined through a site visit and based on existing databases, and confirms the sensitivity allocated on the Screening Tool. Based on the above, in terms of GN 320, no further requirements are applicable i.e. a Compliance Statement is not required.

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10. Appendix A: EAP Declaration

I, Lizande Kellerman, declare that -

- I act as the independent environmental assessment practitioner in this site sensitivity verification:
- I have expertise in conducting environmental impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I will perform the work relating to the site sensitivity verification in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I will take into account, to the extent possible, the matters listed in Regulation 13 of the Regulations when preparing the site sensitivity verification and any report relating to the site sensitivity verification;
- I undertake to disclose to the applicant and the Competent Authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the site sensitivity verification by the Competent Authority; and the objectivity of any report, plan or document to be prepared by myself for submission to the Competent Authority, unless access to that information is protected by law, in which case it will be indicated that such information exists and will be provided to the Competent Authority;
- I will perform all obligations as expected from an environmental assessment practitioner in terms of the Regulations; and
- I am aware of what constitutes an offence in terms of Regulation 48 and that a person convicted of an offence in terms of Regulation 48(1) is liable to the penalties as contemplated in Section 49B of the Act.

Disclosure of Vested Interest (delete whichever is not applicable)

	other) in the proposed activity proceeding other than remuneration for work performed in
	terms of the Regulations;
•	I have a vested interest in the proposed activity proceeding, such vested interest being:

I do not have and will not have any vested interest (either business, financial, personal or

Signature of the Environmental Assessment Practitioner	Meller
Name of Company	CSIR
Date	12 November 2020