

COMMENTS AND RESPONSES REPORT ON THE REVISED ENVIRONMENTAL IMPACT REPORT

This **Comments and Responses Report** (CRR) reflects the comments submitted (in writing) during the commenting period from **Tuesday 22 October to Friday 22 November 2024** on the **Revised Environmental Impact Report** for the **proposed Paardevlei Solar PV photovoltaic & BESS Project**, Somerset-West, Western Cape.

For ease of reference, **Table 1** provides a list of **Interested and Affected Parties** (I&APs) who submitted written comments. **Table 2** provides all **written comments received (and responses thereto)** from these I&APs during the 30-day comment period. For a full record of each comment, refer to the actual comments attached to this CRR.

✉ - mail; 💻 - email; 📠 - facsimile; ☎ - telephone

Table 1: List of I&APs who submitted written comments during the commenting period (for the Revised Environmental Impact Report)

Competent Authority & Interested and Affected Party	Name	Comment Received Via	Date Received
Department of Environmental Affairs and Development Planning (DEA&DP)	Rondine Isaacs	💻	24/10/2024 & 20/11/2024
Department of Environmental Affairs and Development Planning (DEA&DP)	Azola Mahangu	💻	22/11/2024
Western Cape Government: Department of Infrastructure	Vanessa Stoffels	💻	14/11/2024
City of Cape Town (Internal Departments)	Lauren King	💻	22/11/2024
Cape Nature	Ismat Adams	💻	25/11/2024
Rheinmetall Denel Munition (Pty) Ltd.	Lyndon Metcalf	💻	25/11/2024
Balwin Properties	Werner Deysel	💻	21/11/2024
Lionel Smit Studio	Monique Bredell	💻	22/11/2024
South African Civil Aviation Authority	Nrateng Mashiloane	💻	28/11/2024
Department of Agriculture	Brandon Layman	💻	19/11/2024
Friends of Paardevlei	Tiffany Schultz	💻	18/11/2024
Paardevlei Lifestyle Estate	Bonnie Earle	💻	14/11/2024
Interested & Affected Party	Derek Lloyd	💻	19/11/2024
Interested & Affected Party	Simóne Prinsloo	💻	21/11/2024
Interested & Affected Party	David Blundell	💻	22/11/2024



Interested & Affected Party	Cherise van der Berg		18/11/2024
Interested & Affected Party	Judy Brower		14/11/2024

Table 2: Comments submitted by Interested and Affected Parties, as well as the Project Team's responses

COMMENTS	I&AP	PROJECT TEAM RESPONSES
Competent Authority: Department of Environmental Affairs and Development Planning		
1. The above-mentioned document as received by this Department via electronic mail correspondence on 22 October 2024, refers.	Rondine Isaacs Department of Environmental Affairs and Development Planning (Comment dated 24/10/2024)	1. Noted.
2. This letter serves as an acknowledgement of receipt of the aforementioned document by this Department.		2. Noted.
3. This Directorate will provide comment on the revised draft EIA Report within the 30-day commenting period, which commenced on 22 October 2024, and will advise you accordingly.		3. Noted.
4. It is prohibited in terms of Section 24F of the National Environmental Management Act, 1998 (Act No. 107 of 1998) for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity. A person convicted of an offence in terms of the above is liable for a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.		4. Noted.

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>5. Kindly quote the abovementioned reference number in any future correspondence regarding the application.</p>		<p>5. Noted.</p>
<p>The above-mentioned document as received by this Department via electronic mail correspondence on 22 October 2024, and this Department's acknowledgement of receipt letter dated 24 October 2024, respectively, refer.</p>		<p>Noted.</p>
<p>1. This Department has considered the revised draft EIA Report and has the following comments:</p> <p>1.1. <u>Land Use Planning:</u> In accordance with Regulation 8 of the EIA Regulations, 2014 (as amended) and due to the nature of your proposal, this case has been referred to this Department's Land Use Planning section. Comments were obtained as follows:</p> <p>2.1.1 In terms of the City of Cape Town's Spatial Development Framework ("SDF") the proposed site has an "Incremental Growth and Consolidation Area" demarcation.</p> <p>2.1.2 Due to the large area required by PV facilities, it is normally proposed and developed in rural areas. The proposed PV facility is, however, proposed within the urban edge.</p>	<p>Rondine Isaacs</p> <p>Department of Environmental Affairs and Development Planning</p> <p>(Comment dated 20/11/2024)</p>	<p>1.</p> <p>1.1. <u>Land Use Planning:</u> The Department's Land Use Planning Section comments are noted by the Project Applicant.</p> <p>2.1.1 Correct. The proposed Solar & BESS development will occur in the SDF's designated Incremental Growth and Consolidation Area.</p> <p>2.1.2 Correct. The proposed Solar & BESS development is proposed within the current SDF's urban edge.</p>

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<p>2.1.3 Solar PV facilities have become synonymous with infrastructure facilities that are normally found in urban areas. Furthermore, the SDF does not provide a specific category for these energy facilities and the proposed development can be regarded as being consistent with the SDF.</p> <p>2.1.4 If the City of Cape Town is of the opinion that the proposed development is not consistent with the SDF, it will be required that the application be motivated on site specific circumstances to justify the deviation from the SDF, as required in terms of section 22 of the Spatial Planning and Land Use Management Act, 2013 (Act No. 16 of 2013).</p> <p>2.1.5 In terms of the 2023 Helderberg District Spatial Development Framework (“DSDF”) the proposed site has a “<i>New Development Areas</i>” demarcation and in terms of the sub-district: 2 Paardevlei DSDF the proposed site has a “<i>Potential Mixed-Use</i>” demarcation. Therefore, the proposed development is also consistent with the DSDFs.</p> <p>2.2 Applicable listed activities: 2.2.1 Page 44 of the revised draft EIA Report indicates that Activity 4 of Listing Notice 3 may possibly be triggered due to the development of an access road to the proposed site.</p>		<p>2.1.3 Correct, the proposed Solar & BESS development is regarded as consistent with the SDF.</p> <p>2.1.4 The Project Applicant (City of Cape Town) recognises that the proposed Solar & BESS development is in line with the current SDF.</p> <p>2.1.5 Correct. The proposed Solar & BESS development is in line with the latest Helderberg DSDF.</p> <p>2.2 Correct.</p>

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<p>2.2.2 Please be advised that an updated application form, which contains all the listed activities indicated in the revised draft EIA Report, must be submitted with the final EIA Report.</p> <p>2.2.3 Further, please ensure that the updated application form is duly dated and signed by the Applicant and Environmental Assessment Practitioner ("EAP").</p> <p><u>2.3 Consideration of alternatives:</u></p> <p>2.3.1 It understood that Area 2 was not supported by the City of Cape Town's Human Settlements and Urban Planning and Design Departments, and thus the site development plan has been amended to exclude Area 2.</p> <p>2.3.2 Therefore, Area 2 no longer forms part of the proposed development.</p> <p>2.3.3 Section 4 of the EIA Report (consideration of feasible and reasonable alternatives) must include an overview of the original layout (including Area 2) and the amended layout (excluding Area 2) and the reasons why the preferred layouts are deemed as preferred and the previous alternative layout, which included Area 2 was discarded.</p>		<p>2.2.2 An amended Application form which contains all applicable listed activities will be submitted with the Final EIA Report to your Department for consideration.</p> <p>2.2.3 The amended Application form will include both updated and signed Applicant & EAP signatures.</p> <p><u>2.3 Consideration of alternatives:</u></p> <p>2.3.1 Correct, the Amended Site Development Plan (which is restricted to development Areas 1 & 3) is attached as Appendix A3 to the Final EIA Report.</p> <p>2.3.2 Correct, the Amended Site Development Plan is restricted to development Areas 1 & 3.</p> <p>2.3.3 Section 4 of the Final EIA Report (dated November 2024) has been updated accordingly).</p>

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<p><u>2.4 Ecological Impacts:</u></p> <p>2.4.1 Concerns were raised in the comments on the draft EIA Report, by the City of Cape Town: Biodiversity Management Department and CapeNature regarding the Ecological Impact Assessment. Therefore, an external specialist has been appointed to review the Ecological Impact Assessment Report. Please note that comments must be obtained from the City of Cape Town: Biodiversity Management Department and CapeNature to confirm the findings of the review specialist.</p> <p>2.4.2 You are advised to ensure that these comments are adequately addressed in the EIA Report and comments and responses report.</p> <p><u>2.5 Heritage impacts:</u></p> <p>2.5.1 Please be reminded to include the final comment from Heritage Western Cape in the final EIA Report. All comments obtained from Heritage Western Cape, must be addressed prior to the submission of the final EIA Report.</p>		<p><u>2.4 Ecological Impacts:</u></p> <p>2.4.1 Correct, an external Specialist (Mr. Michael Leach from Enviroworks (Pty) Ltd.) has reviewed the Ecological Assessment. This reviewed and updated Ecological Assessment was circulated with the Revised EIA Report (dated October 2024) to all registered I&APs for comment. The City of Cape Town: Biodiversity Management Department and Cape Nature have subsequently provided comments (<i>refer to Appendix D for a copy of the actual comments received</i>) and both these commenting authorities' comments have been adequately addressed in this Comments & Response Report (and the Final EIA Report dated November 2024).</p> <p><u>2.5 Heritage impacts</u></p> <p>2.5.1 The NID and Heritage Impact Assessment have been submitted to Heritage Western Cape (Ms. Stephanie Barnardt) for formal comment, who has indicated that the heritage application will be discussed at the next scheduled HOMs meeting, and that a formal comment will be issued shortly thereafter. This HWC formal comment will be sent directly to your Department by the EAP, if not issued in time to be appended to the Final EIA Report submission.</p>

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<p><u>2.6 Specialist reports:</u></p> <p>2.6.1 As per the Comments and Responses Report relating to the draft EIA Report, please be reminded to include the Curricula Vitae of the specialists who compiled the Glint and Glare Assessment, the High-level Climate Change Risk Assessment Report and Visual Impact Assessment Report.</p> <p>2.6.2 Although it is noted that as per the Protection of Personal Information Act, 2013, you have blocked out the details of the various specialists in the respective specialist reports, please be reminded to include the full details in the final EIA Report, which is submitted to this Directorate for decision-making.</p> <p><u>2.7 Public Participation Process:</u></p> <p>2.7.1 You are required to submit proof of the Public Participation Process being conducted for the revised draft EIA Report. This will include (but is not limited to):</p> <ul style="list-style-type: none"> • Proof that the revised draft EIA Report was made available to registered I&APs; • All comments received from I&APs; • A Comments and Responses Report, indicating all the comments received from I&APs on the revised draft EIA Report and the responses thereto; and • A complete list of registered I&APs. <p>2.7.2 Please ensure that all comments are adequately addressed prior to the submission of the final EIA Report.</p>		<p><u>2.6 Specialist reports:</u></p> <p>2.6.1 The Curricula Vitae of the Visual, Glint and Glare & Climate Change Specialists are appended to the Final EIA Report as Appendix B5, B7 & B8 respectively.</p> <p>2.6.2 The unredacted versions of the Specialist Reports will be submitted with the Final EIA Report to the Department.</p> <p><u>2.7 Public Participation Process:</u></p> <p>2.7.1 The proof of the Public Participation Process conducted for the Revised EIA Report is attached Appendix D to the Final EIA Report. This includes:</p> <ul style="list-style-type: none"> • Proof that the revised draft EIA Report was made available to registered I&APs. • All comments received from I&APs. • A Comments and Responses Report, indicating all the comments received from I&APs on the revised draft EIA Report and the responses thereto. • A complete list of registered I&APs. <p>2.7.2 All the comments received from the registered I&APs on the Revised EIA Report have been adequately addressed in this Comments & Response Report and within the Final EIA Report</p>

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<p><u>2.8 General:</u></p> <p>2.8.1 Please ensure that the co-ordinates of Portion 11 of Farm Helderberg Sleeper Plantation No. 787, Portion 10 of Farm Helderberg Sleeper Plantation No. 787 and Portion 0 (Remaining Extent) of Farm No. 792 are provided in the final EIA Report.</p> <p>2.8.2 This Directorate's comment on the draft EIA Report requested the co-ordinates of the proposed power line corridor. Please ensure this information is included in the final EIA Report.</p> <p>2.8.3 The Comments and Responses Report indicates that the location of the planned power line route is included in the updated Site Development Plan, attached as Appendix 3a to the revised draft EIA Report.</p> <p>2.8.4 Although the location of the proposed power lines have been provided, this Directorate still requires the co-ordinates of the proposed power lines, i.e., starting point, middle point and end point.</p> <p>2.8.5 The minutes of the meeting held between the City of Cape Town: Human Settlements and Sustainable Energy Markets dated 16 September 2024 (as included in Appendix D5), are incomplete. Please ensure that the complete document is attached.</p>		<p>(dated November 2024).</p> <p><u>2.8 General:</u></p> <p>2.8.1 An affected properties map (with co-ordinates) has been included as Appendix A2d to the Final EIA Report.</p> <p>2.8.2 The <i>"Amended Solar PV Layout & Powerline"</i> map, included as Appendix A3a to the Final EIA Report, includes the co-ordinates of the new powerline routes.</p> <p>2.8.3 Correct, refer to the above statement.</p> <p>2.8.4 The <i>"Amended Solar PV Layout & Powerline"</i> map included as Appendix A3a, includes all the requested co-ordinates of the new powerline routes.</p> <p>2.8.5 The complete set of minutes are included in Appendix D5 to the Final EIA Report.</p>

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<p>2.8.6 Please ensure that the requested information is included in the final EIA Report. The final EIA Report must contain all the information outlined in Appendix 3 of the EIA Regulations, 2014 (as amended), and must also include the information requested in this letter. Omission of any of the said information may result in the refusal of Environmental Authorisation.</p> <p><u>2.9 Declarations by applicant, EAP and specialists on final EIA Report:</u></p> <p>2.9.1 You are hereby reminded to include the duly dated and signed declarations of the applicant, EAP and various specialists in the final EIA Report.</p> <p>3. In accordance with Regulation 23(1)(b) of the EIA Regulations, 2014 (as amended) the EIA Report must be submitted to this Department within a period of 156 days calculated from 26 June 2024, i.e., the final EIA Report must be submitted on or before 02 December 2024.</p> <p>4. Should the final EIA Report not be submitted by 02 December 2024, or within 156 days from the date of acceptance of the final Scoping Report where an extension is applicable, the application shall lapse in terms of Regulation 45 of the EIA Regulations, 2014 (as amended) and your file will be closed. Should you wish to continue, a new application form must be submitted.</p> <p>5. Please note that the activity may not commence prior to an environmental authorisation being granted by the Department. It is</p>		<p>2.8.6 The Final EIA Report (dated November 2024) contains all the information outlined in Appendix 3 of the EIA Regulations, 2014 (as amended), and the information requested in this letter.</p> <p><u>2.9 Declarations by applicant, EAP and specialists on final EIA Report:</u></p> <p>2.9.1 The duly dated and signed declarations of the Applicant, EAP and various specialists are attached to the Final EIA Report (dated November 2024).</p> <p>3. The Final EIA Report will be submitted to the Department on or before 02 December 2024.</p> <p>4. Noted. The Final EIA Report will be submitted to the Department on or before 02 December 2024.</p> <p>5. Noted.</p>

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<p>prohibited in terms of Section 24F of the National Environmental Management Act, 1998 (Act No. 107 of 1998) for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity. A person convicted in terms of this prohibition is liable to a fine not exceeding R10 million or imprisonment for a period not exceeding ten years, or to both such fine and imprisonment.</p> <p>6. Kindly quote the abovementioned reference number in any future correspondence regarding the application.</p> <p>The Directorate reserves the right to revise or withdraw comments or request further information based on any information received.</p>		<p>6. The DEA&DP Reference 16/3/3/2/A3/54/2018/24 will be quoted in all further correspondence.</p>
Commenting Authority: Department of Environmental Affairs and Development Planning (Waste Policy and Minimization)		
<p>The above-mentioned document, dated October 2024, as received by the Department of Environmental Affairs and Development Planning Directorate: Waste Management (the 'Department') on 24 October 2024 refers.</p> <p>1. It is recommended that the following aspects, be taken into consideration in terms of waste management for the proposed development and included in the EMPr:</p> <p>1.1. Within the Western Cape Integrated Waste Management Plan 2023-2027, the Department of Environmental Affairs and Development Planning (DEA&DP) highlights a 100% target for diverting organic waste from landfill - it is thus recommended that</p>	<p>Azola Mahangu</p> <p>Department of Environmental Affairs and Development Planning (Waste Policy and Minimization)</p> <p>(Comment dated 22/11/2024)</p>	<p>1. The following recommendations related to waste management will be included in the EMPr (attached as Appendix E to the Final EIA Report, dated November 2024).</p> <p>1.1 This recommendation “any vegetation removed during site clearance, not intended as part of the rehabilitation, must be chipped for processing as mulch or utilised for composting purposes” has been included as a condition under Section 6.3</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>any vegetation removed during site clearance, not intended as part of rehabilitation, be chipped for processing as mulch or utilised for composting purposes.</p> <p>1.2. It is highly recommended that the applicant implements measures, as far as possible, for the recycling and/or recovering of materials from the solar PV infrastructure in the event of partial or complete replacement when reaching 'end-of-life' or undergoing replacement maintenance repairs.</p> <p>1.3. Signage must be used to prevent illegal dumping. There must be visible signage to prevent any littering and illegal dumping from occurring on site throughout the entire development stage of the proposed area including the operational phase.</p> <p>1.4. Waste management actions stated in parts the EMPr are noted and commended. however, it is advised that a waste management plan be included in the EMPr for all stages of this project.</p> <p>1.5. The applicant must ensure that all temporary structures, equipment, material, and facilities used or created on-site during the construction phase are removed and appropriately recycled or disposed at a licenced landfill site.</p>		<p>(pages 34-35) of the EMPr.</p> <p>1.2 This recommendation <i>"implement measures, as far as possible, for the recycling and/or recovering of materials from the solar PV infrastructure in the event of partial or complete replacement when reaching 'end-of-life' or undergoing replacement maintenance repairs"</i> has been included as a condition under Section 6.3 (pages 34-35) of the EMPr.</p> <p>1.3 This recommendation <i>"Signage must be used to prevent illegal dumping. There must be visible signage to prevent any littering and illegal dumping from occurring on site throughout the entire development stage of the proposed area including the operational phase"</i> has been included as a condition under Section 6.3 (pages 34-35) of the EMPr.</p> <p>1.4 Section 6.3 (pages 34-35) of the EMPr has been updated accordingly.</p> <p>1.5 This recommendation <i>"all temporary structures, equipment, material, and facilities used or created on-site during the construction phase are removed and appropriately recycled or disposed at a licenced landfill site."</i> has been included as a condition under Section 6.3 (pages 34-35) of the EMPr.</p>

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<p>Kindly be informed that the D: WM reserves the right to review the provided comments should additional information be made available.</p> <p>Please contact the Directorate: Waste Management should you have any enquiries regarding the comments made.</p>		Noted.
Commenting Authority: Western Cape Government: Department of Infrastructure		
<p>Good day Ryan,</p> <p>Please see this Branch's response to your application.</p> <p>You may remove this Branch from your distribution list related to this proposal.</p> <ol style="list-style-type: none"> 1. No proclaimed roads are affected by the proposal. 2. This Branch offers no objection to the environmental authorisation. 	<p>Vanessa Stoffels</p> <p>Department of Water and Infrastructure</p> <p>(Comment dated 14/11/2024)</p>	Noted.
Commenting Authority: City of Cape Town (Internal Departments)		
<p>Reference is made to the Revised Environmental Impact Assessment Report (EIR), dated October 2024, prepared by JG Afrika for the proposed Paardevlei Solar PV and battery energy storage system project on the Remainder portion of Farm 794/38, Paardevlei, Somerset West. This application has been assessed in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998). Please find consolidated comments from the City of Cape Town:</p>	<p>Lauren King</p> <p>City of Cape Town</p> <p>(Comment dated 22/11/2024)</p>	Noted.


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<p><u>Water and Sanitation: Wastewater Treatment (Planning and Development) – Sven Sötemann</u></p> <p>There are no comments from the Wastewater (Treatment) Branch on the Paardevlei Solar PV and Energy Storage System.</p>		<p><u>Water and Sanitation: Wastewater Treatment (Planning and Development)– Sven Sötemann</u></p> <p>Noted.</p>
<p><u>Water and Sanitation: Technical Services – Chanee Johnson (Annexure A.1-A.3)</u></p> <p>Water and Sanitation: Technical Services has previously provided comment on the above proposed development. Although the previous report remains the same, the response from the applicant in the Comments and Responses Report is noted.</p> <p>Please refer to Annexure A.1 – A.3 for the full and detailed comment from Technical Services, as well as the layout of existing services located on the property in question.</p>		<p><u>Water and Sanitation: Technical Services– Chanee Johnson (Annexure A.1-A.3)</u></p> <p>Noted.</p>
<p><u>Water and Sanitation: Catchment, Stormwater and River Management – Gerhardt Muller (Annexure B)</u></p> <p>Catchment, Stormwater and River Management is not opposed to the proposed development, subject to a number of technical conditions and requirements in terms of stormwater management being complied with.</p> <p>Please refer to Annexure B for the full comment from Catchment, Stormwater and River Management.</p>		<p><u>Water and Sanitation: Catchment, Stormwater and River Management – Gerhardt Muller (Annexure B)</u></p> <p>Noted. It is proposed that the Solar & BESS project will be integrated into the Master Stormwater Plan for the greater Paardevlei site. The Project Applicant (City of Cape Town: Sustainable Energy Markets) will develop a detailed stormwater plan for the proposed Solar facility during the project's detailed design phase (after the EIA process and feasibility phase has concluded).</p>

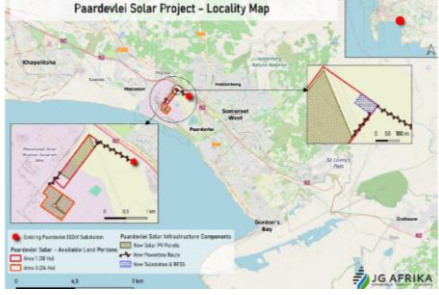
COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p><u>Urban Mobility: Integrated Transport Planning: Transport Impact Assessment and Development Control – Bill Jones (Annexure C)</u></p> <p>Transport has no comments pertaining to the abovementioned application. The Transport Study has identified that the existing bulk road infrastructure has adequate capacity to accommodate the delivery of the essential components for the proposed Paardevlei Solar PV and Battery Energy Storage System during the peak construction phase.</p> <p>Please refer to Annexure C for the comment from Transport Impact Assessment and Development Control.</p>		<p><u>Urban Mobility: Integrated Transport Planning: Transport Impact Assessment and Development Control – Bill Jones (Annexure C)</u></p> <p>Noted.</p>
<p><u>Community Services and Health: Specialised Environmental Health Services, Air Quality Management – Rabelani Gundula (Annexure D)</u></p> <p>Air Quality Management finds the proposed development desirable, subject to a number of technical requirements being included as conditions of approval should Environmental Authorisation be granted.</p> <p>Please refer to Annexure D for the full comment from Air Quality Management.</p>		<p><u>Community Services and Health: Specialised Environmental Health Services, Air Quality Management – Rabelani Gundula (Annexure D)</u></p> <p>Noted.</p>
<p><u>Economic Growth: Enterprise and Investment, Investment Facilitation – Lizelle Arendse</u></p> <p>Investment Facilitation has no further comments.</p>		<p><u>Economic Growth: Enterprise and Investment, Investment Facilitation – Lizelle Arendse</u></p> <p>Noted.</p>
<p><u>Human Settlements: Human Settlements Planning (Land and Forward Planning) – Lwazi Nobaza (Annexure E)</u></p> <p>Having reviewed the Revised EIR, Human Settlements Planning is in agreement with the amended Site Develop Plan (SDP). The use of</p>		<p><u>Human Settlements: Human Settlements Planning (Land and Forward Planning) – Lwazi Nobaza (Annexure E)</u></p> <p>Noted.</p>

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<p>Area 1 (38 Ha) and Area 3 (34 Ha) for the establishment of the proposed solar plant as the preferred alternative, with the exclusion of Area 2 (80 Ha), is supported.</p> <p>Please refer to Annexure E for the full comment from Human Settlements Planning (Land and Forward Planning).</p>		
<p><u>Urban Planning and Design: Metro Spatial Planning and Growth Mechanisms; District Planning and Mechanisms – Thandeka Kabeni / Mishka Jalim (Annexure F)</u></p> <p>It should be noted Urban Planning and Design, Metropolitan Spatial Planning and District Planning previously provided comments during the prior stages of this environmental assessment application process in April and August 2024. Having reviewed the current Revised EIR, it is noted that concerns with regards to the inclusion of the 80Ha site earmarked for mixed use and higher density residential development, as well as concerns with regards to the visual impact of the proposed development, have been adequately addressed in the current report. It is noted that the type of PV Layouts can only be determined and confirmed during the detailed design phase and not during the environmental assessment process. In light of this, it is requested that this department be consulted during the drafting of the Site Development Plan, in order to ensure a more visually appealing landscape is implemented. Lastly, it is reiterated once again that the 2018 Metropolitan Spatial Development Framework (MSDF) was superseded by the council approved 2023 MSDF. The revised EIA report on page 62 still refers to the outdated 2018 MSDF.</p>		<p><u>Urban Planning and Design: Metro Spatial Planning and Growth Mechanisms; District Planning and Mechanisms – Thandeka Kabeni / Mishka Jalim (Annexure F)</u></p> <p>Noted. The CCT Urban Planning and Design Department will be consulted by the Project Applicant (CCT Sustainable Energy Markets) for input into the detailed design of the proposed Solar & BESS project.</p>

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<p>Please refer to Annexure F for the full comment from Urban Planning and Design on the DEIR.</p>		
<p><u>Environmental Management Department</u> <u>Biodiversity Management – Charmaine Oxtoby (Annexure G)</u> Biodiversity Management acknowledges the Comments and Response Report. However, a number of questions and concerns were raised, and recommendations made with regards to the proposed offset implementation plan recommended on page 50 of the Revised Ecological Impact Assessment (i.e. Appendix B1b). It is recommended that these concerns be addressed in the final report to be submitted to the competent authority, prior to a final decision being made.</p> <p>Furthermore, it is recommended that the no-go area south of Area 3 be conserved under the Protected Areas Act and be linked to the planned Paardevlei Conservation Area to the east through meaningful ecological corridors. The management authority for this conservation area and the required resources must be considered in the offset study.</p>		<p><u>Environmental Management Department</u> <u>Biodiversity Management – Charmaine Oxtoby (Annexure G)</u> As per page 50 of the Ecological Assessment, the Specialist has recommended the following:</p> <ul style="list-style-type: none"> • Relocation of important species (if found), identification and demarcation of specimens and sub habitats not to be disturbed will have to be done beforehand by a specialist. An offset implementation plan should be drafted pre-construction. • Important species (flora) that will be threatened by the development must be relocated to safer habitats by suitable specialists. <p>According to the Specialist's recommendations listed above, it is recommended that a detailed pre-construction ecological assessment be conducted for the area to be impacted (after the detailed design phase has concluded, and the site development footprint concluded /finalised). During this assessment, any flora and fauna species of conservation concern can be identified and translocated to a suitable receptor area. The need for an Offset can also be determined during this pre-construction ecological assessment.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>Lastly, botanical search and rescue operation must be conditioned for all indigenous vegetation impacted on during the proposed development. Special attention must be given to geophytes, species of conservation concern and any plants that translocate readily. Appropriate receptor areas at the neighbouring Paardevlei Conservation Area must be identified in consultation with Biodiversity Management. These receiving areas must be suitably prepared before planting the translocated plants.</p> <p>Please refer to Annexure G for the full and detailed comment from Biodiversity Management.</p>		<p>Noted, as stated in the section above, <u>a detailed pre-construction ecological assessment must be completed for the final Site Development Footprint area (after the detailed design phase has concluded). A search and rescue of indigenous vegetation of conservation concern must form part of this pre-construction ecological assessment.</u></p>
<p><u>Environmental and Heritage Management: Heritage Section – Johan van Wyk</u></p> <p>It is noted that the EIR has been revised to include only Areas 1 and 3 and to exclude Area 2, which measures approximately 80 ha. It is furthermore noted that mention is made in the Comments and Responses Report, dated October 2024, that <i>“In summary it appears from the HIA findings, that the only buildings / structures of heritage significance within the solar development footprint is a metal railway track and the De Beers Football Club. The mention of over 40 structures older than 60 years that exist on the property refers to the overall Paardevlei site area and is not specific to the proposed solar development footprint.”</i></p> <p>The above statement, which makes reference to the word ‘appears’, is not deemed to be adequately factual in nature and thus it is not possible to provide an informed comment on the Revised EIR from a heritage point of view. The Heritage Section has noted the</p>		<p><u>Environmental and Heritage Management: Heritage Section – Johan van Wyk</u></p> <p>Correct.</p> <p>The final Heritage Impact Assessment (attached as Appendix B3 to the Final EIA) has indicated the following heritage structures within close proximity to the proposed Solar Development Footprint, namely:</p> <ul style="list-style-type: none"> • Metal Railway Track. • De Beers Football Club. <p>In terms of the Amended Site Development Plan, only Areas 1 & 3 will be developed and therefore now excludes Area 2, which previously impacted De Beers Football Club. De Beers Football Club will therefore not be negatively impacted by the proposed</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>existence of structures older than 60 years in its previous comments dated 23/04/2024 on the Draft Scoping Report (DSR) and 28/08/2024 on the Draft Environmental Impact Report (DEIR). As an example, the extract from the 1953 aerial photograph (see Figure 1 below) does show the existence of several structures that existed at that point in time, especially on (but not necessarily limited to) the current Area 3. Although most of these structures (if not possibly almost all) have been demolished in the past, it is unclear whether or not some of these structures still remain on Areas 1 and 3. The applicant is, therefore, requested to compile a survey of all remaining structures (i.e. not just buildings) that exist within Areas 1 and 3 and that such survey be visually represented by means of the mapping and grading of the remaining structures. It is requested that such survey be included in the Heritage Impact Assessment (HIA), which was recently submitted to Heritage Western Cape, for their consideration and comment.</p> 		<p>Solar & BESS project.</p> <p>Regarding any other heritage resources on the proposed development Areas 1 & 3, a NID and Heritage Impact Assessment has been submitted to Heritage Western Cape (Ms. Stephanie Barnardt) for formal comment, who has indicated that the heritage application will be discussed at the next scheduled HOMs meeting, and that a formal comment will be issued shortly thereafter.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
 <p>The applicant is reminded to include the final comment from Heritage Western Cape in the final EIA Report and that all comments obtained from Heritage Western Cape must be addressed prior to the submission of the final report to the competent authority.</p> <p><u>Environmental and Heritage Management: Environmental Section – Lauren King</u></p> <p>Having reviewed the Revised EIR, Comments and Response Report and associated updated specialist reports for the proposed Paardevlei Solar PV and battery energy storage system (BESS), the Environmental Section has the following remarks and comments:</p> <ol style="list-style-type: none"> 1. It is noted that the preferred alternative in terms of land portions for the proposed Paardevlei Solar PV and BESS has been limited to Areas 1 (38 ha) and 3 (34 ha), and that Area 2 has been excluded from the project site. 2. The amended Site Development Plan (SDP), which indicates the location of the solar panels and associated infrastructure, as requested previously, as well as all the environmental sensitive areas identified is also noted. The impacts of associated infrastructure have also been 		<p><u>Environmental and Heritage Management: Environmental Section – Lauren King</u></p> <ol style="list-style-type: none"> 1. Correct. 2. Correct.

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>identified and mitigation measures have been proposed by the relevant specialists.</p> <p>3. The applicant has indicated that the final PV layout will only be determined during the detailed design phase. Therefore, the chosen PV layout from the three alternatives provided cannot be confirmed at this stage. It is recommended that the visual impact of the solar panels be considered in this selection and that the E&HM Branch be consulted during the drafting of the Site Development Plan and associated Detailed Landscape Plan.</p> <p>4. It is noted that the preferred layout will result in the removal of the Eucalyptus trees located on Areas 1 and 3. The applicant has indicated that, as per the recommendation in the Geohydrological Assessment, a site-specific Surface Water Management Plan will be compiled for the proposed development during the detailed design phase. It is recommended that this be included as a condition of approval in the Environmental Authorisation, if issued.</p> <p>5. It is noted that the applicant has indicated that a site-specific Stormwater Management Plan will be developed during the detailed design phase, prior to construction of the proposed development commencing. It is recommended that this be included as a condition of approval in the Environmental Authorisation, if issued.</p>		<p>3. Noted. The CCT E&HM Branch will be consulted by the Project Applicant (CCT Sustainable Energy Markets) for their input into the detailed design of the Site Development Plan and associated Detailed Landscape Plan.</p> <p>4. Agreed. The development of a site-specific Surface Water Management Plan (during the detailed design phase of the project) must be included as a condition of Environmental Authorisation.</p> <p>5. Agreed. See statement above.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>6. The concern with regards to water provision for the cleaning of solar panels has been addressed as follows: <i>“water for the cleaning of panels will be imported and stored on site via temporary jojo storage tanks. The specific angle (i.e. 15-degree inclination) of the PV panel technology proposed will also assist as a self-cleaning mechanism”</i>. It is unclear where this water will be sourced from and what the size and number of JoJo tanks required will be. Once the detail with regards to water storage for maintenance purposes have been finalised, the location and sizes of the proposed JoJo tanks must be indicated on the SDP and Detailed Landscape Plan.</p> <p>7. The updated mitigation measures of the Freshwater Specialist to create ecological corridors and to pull back the development from these corridors are supported. The application must take cognisance of the recommendations and mitigation measures on page 26 – 28 of the Final Specialist Aquatic Ecosystems Assessment, dated October 2024 as compiled by Liz Day, during the Detailed Design Phase.</p>		<p>6. Noted. Information regarding the size and number of JoJo tanks required for the cleaning of PV panels during the Solar facility’s operational phase can only be determined after the detailed design phase, and upon finalisation of the Site Development Plan. The CCT E&HM Branch will be consulted during this phase of the project.</p> <p>7. Agreed. The amended or pulled-back ecological / aquatic corridors are presented in the consolidated Environmental Sensitivity map attached as Appendix A2 to the Final EIA Report. The implementation of the mitigation measures on pages 26 – 28 of the Final Specialist Aquatic Ecosystems (Wetland) Assessment must be made as conditions of the Environmental Authorisation.</p>
<p><u>Conclusion:</u></p> <p>Having reviewed the Revised Environmental Impact Assessment Report (EIR) and circulated it to the relevant departments/branches, the proposed development is deemed desirable in principle, subject to the above technical requirements and comments that must be included and addressed in the final EIA report to be submitted to the competent authority for decision making.</p>		<p><u>Conclusion:</u></p> <p>Noted. All of the CCT’s Internal Department’s technical requirements and comments have been included and addressed in this Comments & Response Report and final EIA report (dated November 2024).</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>Should you wish to discuss the above comments, please do not hesitate to contact the Environmental and Heritage Management Branch via e-mail on the details provided on the letterhead of this document.</p>		
Commenting Authority: CapeNature		
<p>Herewith CapeNature's comment on this application.</p> <ol style="list-style-type: none"> 1. Based on the BAR it is understood that area 2 has been excluded from the SDP, and the SDP has therefore avoided wetland areas associated with area 2 including salt marsh areas. 2. Rehabilitation has been proposed in the freshwater assessment, and area 2 could therefore be used to further offset the wetland removal that will occur in area 1. 3. The avifaunal assessment has indicated that there is an existing patch of secondary CFDS within the area 3 that will be impacted, while the rest of the site is mostly grassland and invasive alien species as well as alien tree plantations. 	<p>Ismat Adams</p> <p>CapeNature</p> <p>(Comment dated 25/11/2024)</p>	<ol style="list-style-type: none"> 1. Correct. The Amended Site Development Plan (attached as Appendix A3 to the Final EIA Report) only includes the proposed Solar & BESS development on Areas 1 & 3. 2. Correct, this has been recommended in Liz Day's Wetland (Freshwater) Assessment (attached as Appendix B2 to the Final EIA Report). The delineation of wetland areas and associated ecological corridors to be conserved is presented in the consolidated Environmental Sensitivity Map (attached as Appendix A2 to the Final EIA Report). 3. Correct. The absolute no-go area for development as defined by the Avifaunal Specialist is situated just south, and outside of development Area 3.

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>The plantation areas and CFDS areas have been assessed as medium SEI for avifaunal species with impacts that can be reduced to low negative with mitigation.</p> <p>The ecological assessment has not provided a delineation like the avifaunal assessment, which makes it unclear whether any other representative vegetation type is on site and whether the secondary indigenous vegetation as per appendix A2a is representative of any threatened vegetation type. Based on the photos provided in the ecological assessment, vegetation unit descriptions, and without a list of the species observed in the vegetation units, it appears that the vegetation units do not possess the structure or species diversity of the listed mapped vegetation types, and it is likely that granite fynbos and sand fynbos is no longer present. This is however speculative. The ecological specialist has not analysed the data collected to determine whether any representative vegetation type is present, and therefore I cannot draw any further conclusions on what the condition or vegetation type of the habitat might be, as I have not conducted the survey. Essentially, the ecological specialist needs to answer the following:</p>		<p>The “<i>conclusion and recommendations</i>” section (page 47-49) of the final Ecological Assessment (attached as Appendix B1 to the Final EIA Report) states the following “<i>From the survey conducted, majority of the habitats within the project footprint have been highly transformed. This transformation has resulted in high infestation of alien plants, and introduction of secondary vegetation. Although the desktop survey of the vegetation types of the project area indicate Endangered and Critically Endangered types, there are no representatives of the original vegetation types remaining as a result of the land transformation. The site is currently used for livestock grazing. However, there are patches of aquatic microhabitats that have resulted from this land transformation. These habitats may provide refuge for residential faunal species. The proposed infrastructure should not extend over the delineated drainage line in Figure 16. Any other sensitive aquatic areas will be guided by the aquatic/wetland study. The structures should be aligned in such a way that the drainage line remains in its natural state.</i>” In terms of an ecological no-go area, the Specialist has demarcated the drainage line (which occurs in development Area 2, and therefore does not fall within the Amended Site Development Plan, where development is only proposed in Areas 1 & 3). This drainage line coincides with the aquatic corridor as defined in the Wetland</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>3.1 Based on the site survey, is representative Cape Flats Dune Strandveld, Cape Flats Sand Fynbos and Boland Granite Fynbos present on site?</p> <p>3.2 Where are the degraded areas, highly degraded areas, transformed areas, intact areas, semi-intact areas on site?</p> <p>3.3 Where are the SCC located on site and what is the size and regional significance of their sub-population?</p> <p>The answer to these questions will inform the sensitivity of each area of the site and the resultant impact of developing these areas.</p> <p>Based on the avifaunal assessment, the site is degraded to</p>		<p>Assessment (attached as Appendix B2 to the Final EIA Report). <u>All of the ecological and aquatic no-go areas for the proposed Solar & BESS development are presented in a consolidated Environmental Sensitivity map (attached as Appendix A2 to the Final EIA Report).</u></p> <p>3.1 No, the Ecological Assessment states <i>“From the survey conducted, the majority of the habitats within the project footprint have been highly transformed. This transformation has resulted in high infestation of alien plants, and introduction of secondary vegetation. Although the desktop survey of the vegetation types of the project area indicate Endangered and Critically Endangered types, <u>there are no representatives of the original vegetation types remaining as a result of the land transformation.</u>”</i></p> <p>3.2 The majority of the development site is highly transformed and therefore no representatives of the original vegetation types remaining as a result of the land transformation.”</p> <p>3.3. No SCC have been identified by the Ecological Specialist to occur on the proposed Solar & BESS development footprint. The Specialist has however recommended that a detailed pre-construction ecological assessment must be completed for the final Site Development Footprint area (after the detailed design phase has concluded). A search and rescue of indigenous vegetation of conservation concern must form part of this pre-construction ecological</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>highly degraded based on historical land-use changes.</p> <p>4. It is noted as per the CRR that a herpetological survey will be conducted prior to commencement. If there are amphibian breeding areas within the proposed development area, then these should be avoided, which may impact the SDP.</p> <p>5. The avifaunal assessment is supported, all mitigation measures must be implemented.</p> <p>6. The freshwater assessment is supported, but the exclusion of area 2 allows potentially opportunity for further wetland rehabilitation measures in area 2, that could provide net positive wetland impacts.</p> <p>7. The ecological assessment has indicated the need for rehabilitation and the compilation of a rehabilitation plan as well as translocation of SCC. The required rehabilitation plan should be compiled and incorporated for action into the EMPr.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information</p>		<p>assessment.</p> <p>4. Correct. The Ecological Specialist has recommended a detailed pre-construction ecological assessment (which includes a flora and fauna, herpetological & amphibian survey) once the detailed design has concluded, and the actual area to be impacted by the proposed Solar & BESS development is confirmed.</p> <p>5. Noted.</p> <p>6. Correct.</p> <p>7. Correct. This Ecological Specialist's recommendation for the compilation of a rehabilitation plan & translocation of SCC from the development areas has been included as a requirement within the EMPr, before any activity or construction commences.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
that may be received.		
Interested and Affected Party: Rheinmetall Denel Munition (RDM)		
<p>Good day Ryan,</p> <p>Pls find further comments from RDM:</p> <p><i>“The City of Cape Town, as the Project Applicant, will lodge the necessary applications (separate to this EIA process) to the applicable Regulatory Authority (i.e. National Key Point Regulator Provincial Director).”</i></p> <ul style="list-style-type: none"> The whole purpose of the PPP is the obtain comments, inputs from all relevant stakeholders regarding the planned development/project. Why are you not addressing it within the process and including it? How do you now propose to do applications outside of the process, we have raised our concern and risk within the process and thus it needs to be addressed accordingly. 	<p>Lyndon Metcalf</p> <p>RDM</p> <p>(Comments dated 25/11/2024)</p>	<ul style="list-style-type: none"> The PPP is conducted in terms of the NEMA EIA Regulations (2014, as amended) in support of the application for Environmental Authorisation which is administered by the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP). The City of Cape Town (Project Applicant) notes the public safety circles in terms of the OHS-Act regulations. For permission to develop within the safety circles will entail that the Project Applicant would need lodge a separate application to the applicable Authority, namely Department of Labour & Employment, as the DEA&DP could not grant such permission. Please refer to the above statement.

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<ul style="list-style-type: none"> You have further not addressed the matter of the risk assessment. <p><i>“The Explosives Regulations, 2024 under the Occupational Health and Safety Act, do not have the required annexure to regulate safety circles around explosive installations. Thus, there is currently no legal obligation to observe any rules regarding such circles”</i></p> <ul style="list-style-type: none"> Pls refer to Section 11 of Explosives Regulations. <p><i>“However, the City of Cape Town notes the public safety circles in terms of the earlier regulations. If required, the City will lodge the necessary application to the applicable authority to permit the development of the solar facility on these City owned land portions. The proposed construction of the Solar PV facility will be for a limited period and strictly controlled by the City of Cape Town. During the operational phase, the cleaning of the modules is the main activity</i></p>		<ul style="list-style-type: none"> A risk assessment in terms of the proposed development of the solar facility within the safety circles would need to form part of the application to be submitted to Department of Labour & Employment, it wouldn't form part of the EA application process (in terms of the NEMA EIA Regulations (2014, as amended). However, this issue/ concern raised by RDM (as a directly adjacent stakeholder to the proposed Solar Development) has been captured as part this Scoping & EIA Process and will therefore be considered by the DEA&DP in their decision making. The City of Cape Town (Project Applicant) has reviewed the Explosives Regulations and will lodge the necessary application to the applicable authority (i.e. Department of Labour & Employment) insofar as this may be necessary.

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p><i>to be completed within the safety circles, as well as any preventive or corrective maintenance. With the right procedures, this can be completed safely within the circles. The PV plant operation is unmanned, and the substation will be located in the northern part of the land far away from the circles. Most of the operational staff will be located at the substation where the PV plant controls will also be located. This substation location will also be located outside of the safety circles"</i></p> <ul style="list-style-type: none"> Pls refer to the Regulations in terms of what is allowed within the safety circles. Similarly, the applications and approvals must be sought as part of this process and not outside. 		<ul style="list-style-type: none"> The City of Cape Town (Project Applicant) notes the public safety circles in terms of the OHS-Act regulations and has reviewed the Explosives Regulations. If required, the City will lodge the necessary application to the applicable authority (i.e. Department of Labour & Employment) to permit the development of the solar facility on these City owned land portions. The current application is conducted in terms of the NEMA EIA Regulations (2014, as amended) in support of the application for Environmental Authorisation which is administered by the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP), and not an application for development within these public safety circles in terms of the OHS-Act regulations (which would be administered by the Department of Labour & Employment).

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p><i>“RDM further suggests that the Department of Labour & Employment be consulted and get input. The City of Cape Town will lodge the necessary application to the applicable authority (i.e. Department of Labour) insofar as this may be necessary”</i></p> <ul style="list-style-type: none"> Pls include their inputs and comments as part of this PPP process. <p><i>“The City of Cape Town notes the public safety circles in terms of the OHS-Act regulations. If required, the City will lodge the necessary application to the applicable authority to permit the development of the solar facility on these City owned land portions.”</i></p> <ul style="list-style-type: none"> Pls include this necessary permitting application since its forms part of the PPP and is a regulatory approval. The concerns raised is not adequately addressed but rather deferred. 		<ul style="list-style-type: none"> The City of Cape Town will lodge separate applications to the Department of Labour & Employment and the National Key Point Regulator, as legislative processes which are separate to the current EIA process, conducted in terms of the NEMA EIA Regulations (2014, as amended) The necessary permitting application submission for the development within the public safety circles does not form part of this PPP & EIA Process In terms of the PPP conducted, as per the NEMA EIA Regulations (2014, as amended), the issue raised by RDM (as the directly adjacent landowner to the proposed solar development) has been captured in this Comments & Response Report, which will be submitted

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p><i>“PV modules are tested against fire hazard and are classified as type 1, meaning that they can be extinguished easily. PV modules are generally not a fire risk, with potential fires usually occurring on the cables and not on the PV modules. Nonetheless, the proposed PV Solar facility will comply best practices in this regard to prevent any potential fire risks. The majority of the soil on site is saturated with perennial ground and surface water so will also limit the chance of any fire outbreak spreading”</i></p> <ul style="list-style-type: none"> • We respectfully ask an expert opinion on this and not the view of the project team. <p><i>“Both the proposed development Areas 1 & 3 are currently zoned as “Risk Industry” and may need to undergo a rezoning application to cater for the proposed Solar development.”</i></p> <ul style="list-style-type: none"> • When will this take place? It is part and partial of the process. <p><i>“The Project Applicant, namely City of Cape Town (Sustainable Energy Markets) has indicated that the type of PV Layouts (as mentioned in the section above) can only be determined and confirmed during the detailed design phase and not during the current (EIA) feasibility phase of the project.”</i></p> <ul style="list-style-type: none"> • How can this be? It will then mean the process is flawed if not declared upfront. 		<p>with the Final EIA Report to the DEA&DP for decision making.</p> <ul style="list-style-type: none"> • This statement regarding fire hazards associated with the PV modules was provided by the Renewable Expert (Technical Consultant) on the Project Applicant’s Technical Team, namely Mr. Agostinho Garcia. • The rezoning application (in terms of the City of Cape Town Municipal Planning by-law) is separate to, and usually follows the completion of the EIA process. • This EIA forms part of the overall feasibility study for the proposed Paardevlei Solar & BESS project. PV layout options are therefore provided in the EIA Report. The exact PV layout on the Paardevlei site can therefore

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<ul style="list-style-type: none"> • What if the panel selected has more glare/reflection than the ones used in the studies? • What was the studies based upon? • Are you using solar tracking? If so, then glint n glare, reflection must take it into consideration. <p><i>“Suitability for the Paardevlei Solar PV farm. The Li-ion is suitable for the project, given its high level of weight-to-energy and weight-to-power ratio which allows to reduce transportation costs and install a large capacity in the project site without occupying a large area, with the system being stored in a pre-assembled containerized solution.”</i></p> <ul style="list-style-type: none"> • Have you adequately investigated the fire/explosion risk of these batteries? 		<p>only be confirmed once of the statutory approvals are in place and the detailed design phase has commenced.</p> <ul style="list-style-type: none"> • Only the PV layout options which were assessed during the EIA Process (and the Glint and Glare Study) will be utilised for the Solar & BESS project. • The Glint and Glare assessment evaluated the PV layout options (namely Fixed tilt panels, Single Axis tracker panels & East West Sheds) as contained within the EIA Report. • The completed Glint and Glare assessment evaluated the PV layout options, which included “Single Axis tracker panels”. • The Battery Energy Storage System (BESS) will consist of a pre-assembled containerized solution in a temperature-controlled environment which is monitored and contains an automatic fire extinguishing

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<ul style="list-style-type: none"> Have you adequately addressed the risk to the environment of these batteries? <p><i>"In summary, the Project Applicant has indicated that the suitability of the above presented BESS technologies can only be determined during the project's detailed design phase."</i></p> <ul style="list-style-type: none"> Will this still be within the EIA process or post? If post, then how would the risk/impact be assessed if the EIA is already completed. <p>Pages 77-78 of the Revised EIA Report, why has DOLE (Department of Labour & Employment) and NKP (National Key Point Regulator) been excluded, after we already commented during the first round</p>		<p>mechanism. The BESS will be certified according to the safety standards for electrical batteries.</p> <ul style="list-style-type: none"> The proposed BESS will be pre-assembled before transported to the development site and therefore a "closed system" which will limit any leakages of hazardous substances into the receiving environment. This will be post / after the EIA process is concluded and determined during the detailed design phase. The proposed BESS will be pre-assembled before transported to the development site and therefore a "closed system" which will limit any risks in terms of potential leakages of hazardous substances into the receiving environment. <p>The City of Cape Town will lodge separate applications to the Department of Labour & Employment and the National Key Point Regulator, as these legislative processes are separate to</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>and asked for their inclusion?</p> <p>Pages 154-205 of the Revised EIA Report, why are the risks we have raised not been assessed and included?</p>		<p>the current EIA process, conducted in terms of the NEMA EIA Regulations (2014, as amended).</p> <p>The potential fire and leakage risks associated with the proposed BESS are not considered significant to the receiving environment as these batteries are pre-assembled containerised solutions, which are temperature controlled and contain fire protection measures.</p>
Interested and Affected Party: Balwin Properties		
<p>In response to DEA&DP Reference No: 16/3/3/2/A3/54/2018/24, Balwin Properties Limited (Balwin) acknowledge the contents of the Revised Environmental Impact Assessment Report and have the following comments:</p> <ol style="list-style-type: none"> 1. The environmental assessment conducted by Mora Ecological Services (Pty) LTD in November 2023, PSF/ECO1123, (contained in the updated EIA package) outlines the considerable ecological consequences of the planned development. The initiative is expected to impact a large area of land, affecting crucial vegetation types in the bioregion. The expert report from October 2024 confirms the impact levels for zones 1 & 3, and notes that the previously proposed mitigations remain valid and applicable. This emphasizes the importance of minimizing disruption to the natural environment and preserving the 	<p>Werner Deysel</p> <p>Balwin Properties</p> <p>(Comment dated 21/11/2024)</p>	<ol style="list-style-type: none"> 1. Agreed. The Ecological Specialist has designated no-go zones for development which contain ecosystems / areas of ecological significance (as presented in the consolidated Environmental Sensitivity Map attached as Appendix A2 to the Final EIA Report).

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>existing ecosystem.</p> <p>Moreover, the aforementioned assessment details various key strategies for protecting flora and fauna. These strategies include reducing disturbances, transferring important species, identifying and marking specimens and sub-habitats for preservation, and creating an offset implementation plan before construction begins. The specialist does not oppose the proposed development and suggests its approval by the Competent Authority, on the condition that the recommended mitigations and guidelines are strictly followed.</p> <p>a. The comments and responses additionally indicate that the vegetation is classified as secondary Indigenous and Alien, with no critical importance identified in the two areas. This information contradicts the aforementioned specialist report. An inquiry is raised regarding whether the ecological report will be revised to address areas 1 and 3, specifically as the impact rating is subject to revaluation due to the exclusion of the large area 2.</p> <p>b. Furthermore, in light of the existing mitigation strategies and recommendations, it remains unclear whether an offset</p>		<p>Correct. The implementation of the Ecological Specialist's recommended mitigations during the Solar & BESS project development, should be made a condition of the Environmental Authorisation.</p> <p>a. As per Figure 16 of the Ecological Specialist's report (attached as Appendix B1 to the Final EIA Report) the ecological sensitive no-go area (namely a drainage line) has been demarcated and occurs outside of the Amended Site Development Plan (Areas 1 & 3). The rest of the vegetation occurring within proposed development Areas 1 & 3 has been classified as secondary indigenous vegetation (with no critical biodiversity significance) and alien vegetation. Please also refer to the consolidated Environmental Sensitivity Map attached as Appendix A2 to the Final EIA Report which presents the all the environmental no-go areas for the development.</p> <p>b. As per the Ecological Assessment (page 50), the Specialist has recommended the following items (to be</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>is considered.</p> <p>2. Balwin, a key stakeholder in the area's development, has expressed concerns about the impact of this solar project on the overall development potential of the site. Their</p>		<p>implemented by the Project Developer) for the conservation of the current on-site vegetation structure:</p> <ul style="list-style-type: none"> • The proponent must be committed to a conservation approach of practice and the actual footprint of disturbance must be kept to a minimum. • As much of the natural environment must be conserved, there should be minimal vegetation clearing. • Relocation of important species, identification and demarcation of specimens and sub habitats not to be disturbed will have to be done beforehand by a specialist. An offset implementation plan should be drafted pre-construction. • Important species (flora) that will be threatened by the development must be relocated to safer habitats by suitable specialists. • Preventative erosion control measures to be put in place. • Conduct alien invasive species monitoring on an annual basis. <p>2. The Project Applicant (City of Cape Town) has significantly decreased the development footprint of the proposed Solar & BESS project through the exclusion of Area 2 (80 ha) and now only intends to</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>estimations suggest a substantial reduction in the number of dwelling units, schools, and commercial spaces that could be constructed on this land. This decrease in developable areas not only affects the housing capacity but also has far-reaching implications for job creation, infrastructure development, and overall economic stimulation in the region. The loss of these potential social and economic benefits poses a significant challenge to the original vision for the area's growth and development, necessitating a careful reassessment of the balance between renewable energy initiatives and urban development needs.</p> <p>For any further information or queries please contact the following Balwin representatives:</p> <p>Clare Harrison – General Manager: clareh@balwin.co.za Marno Gerber – Contracts Manager: marnog@balwin.co.za Werner Deyssel – Regional SHEQ Manager WC & KZN: wernerd@balwin.co.za</p>		<p>develop on Areas 1 & 3 – refer to Amended Site Development Plan – attached as Appendix A3 to the Final EIA.</p> <p>Noted.</p>
Interested and Affected Party: Lionel Smit Studio		
<p>Dear Ryan,</p> <p>Thank you for your feedback on my previous letter. I respectfully maintain my position of opposition, which I outline again for the following reasons:</p>	<p>Monique Bredell</p> <p>Lionel Smit Studio</p> <p>(Comment dated 22/11/2024)</p>	

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>1. <u>City of Cape Town’s Power Independence</u></p> <p>While the City of Cape Town’s efforts to reduce its reliance on Eskom are admirable, it is essential to consider the broader implications of these initiatives.</p> <p>For example, the closure of the Komati Power Station—a functioning coal power plant— under South Africa’s “green transition” commitments raised significant concerns, especially amid persistent load-shedding. Reports suggest that this decision was heavily influenced by international climate agreements and funding pledges. While aligning with global climate objectives, it arguably prioritised the interests of wealthier nations over South Africa’s urgent energy needs. This approach intensified the energy crisis, leaving citizens to bear the consequences of insufficient power supply and associated economic challenges¹.</p> <p>In contrast, countries like Germany have been building new coal-fired power plants to secure their energy needs, even as South Africa continues to export coal to Europe and China while being pressured to phase out its own coal infrastructure. This apparent double standard underscores the need for a balanced energy strategy that aligns international commitments with national priorities².</p> <p>While I support the City’s push toward energy independence, I strongly oppose using lush green belt areas for solar plants. These spaces should be protected and alternative sites— such as brownfields or rooftops—prioritized for such projects. If the City lacks suitable brownfield locations for solar or land for nuclear</p>		<p>1. <u>City of Cape Town’s Power Independence</u></p> <p>Noted. It is the intention of the City of Cape Town to produce electricity independently and sustainably (through the implementation of renewable energy projects) and therefore be less reliant on the Eskom network and thereby ensuring a more long-term stable supply of electricity to the City of Cape Town residents.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>energy facilities, this should not come at the expense of our open green spaces.</p> <p>Point 5 elaborates on the energy output vs resources required.</p> <p><u>2. Fight against Climate Change</u></p> <p>The City of Cape Town has emphasized the importance of renewable energy as part of the broader fight against climate change and the pursuit of “net zero” emissions. However, recent reports suggest that the data driving this narrative may not be as robust as it appears.</p> <p>A recent study³ has confirmed that human-generated CO₂ has had “a negligible effect” on the Earth’s greenhouse impact over the past 150 years. According to the study, <i>“Human CO₂ emissions represent 4% of the total, meaning the overall human contribution to the enhancement of the greenhouse effect is only 0.16% to 0.20%—a negligible effect”</i> on the climate.</p> <p>Adding to this complexity, new research⁴ revealed that plants the world over are absorbing about 31% more carbon dioxide than previously thought. The research, detailed in the journal Nature, is expected to improve Earth system simulations that scientists use to predict the future climate, and spotlights the importance of natural carbon sequestration for greenhouse gas mitigation.</p> <p>Another groundbreaking study⁵ suggests that CO₂ <i>“may have little to no further warming effect”</i> on the Earth’s atmosphere, challenging long-held assumptions in climate science.</p>		<p><u>2. Fight against Climate Change</u></p> <p>Noted. The City of Cape Town is proposing the roll out of renewable energy projects as a mechanism of producing energy independently from Eskom, but also with the aim of limiting the future generation of carbon emissions through other power generating sources (i.e. coal fired stations).</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>Moreover, a recent audit by Oxfam⁶ revealed significant issues in climate finance transparency. Their report on the World Bank’s 2017-2023 climate finance portfolio found that between \$24 billion and \$41 billion in climate finance went unaccounted for between project approval and completion. This points to the growing corruption and mismanagement within the climate crisis narrative.</p> <p>Meanwhile, global demand for fossil fuels (coal, oil, and natural gas) has surged by 117.5% since the 1970s, and consumption has reached record highs. China, for example, emitted approximately 83 billion tons of CO2 between 2014 and 2021, while South Africa’s emissions during the same period were only around 3.5 billion tons⁸. Despite accounting for just 1.2% of global CO2 emissions, South Africa is being asked to make significant sacrifices in energy security, even as countries like China continue to increase their emissions. Reaching net zero would have little to no global impact, given our modest contribution to global emissions.</p> <p>While the push for renewable energy and achieving net-zero emissions is a central goal for many cities, it is critical to consider the broader context and implications. South Africa’s relatively minor contribution to global CO2 emissions raises questions about the impact of drastic energy transitions, particularly when compared to the increasing emissions from larger producers. With mounting concerns over data integrity, potential corruption, and the true effectiveness of such measures, it is essential to reassess the balance between environmental objectives and the practical costs, particularly in terms of energy security.</p>		

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>Furthermore, there is growing concern that experts may be financially incentivised to “find” evidence supporting the idea that warming is solely man-made and dangerous, much like how tobacco companies once funded studies to downplay the health risks of smoking. This calls into question the objectivity of climate change narratives and demands a more balanced and transparent approach moving forward.</p> <p><u>3. Confirmation of Funding</u></p> <p>I understand that the City of Cape Town has secured funding for this project, but the nature of this funding—whether in the form of grants or low-interest loans—remains unclear. Could you please provide clarification on this matter? If the funding consists of grants, does it cover the full scope of the project, including the preparation phase (such as the comprehensive list of mitigation requirements), installation, 25 years of maintenance, and decommissioning? If not, could you specify the components of the project that are included in the funding?</p> <p>Given that taxpayers will bear any remaining costs, I am concerned about the financial implications, particularly considering the extensive mitigation measures, which could substantially increase the overall project cost. I understand that the project is partially municipally funded (i.e., taxpayer-funded), but could you clarify the extent of taxpayer contribution?</p> <p>Considering the significant costs, which will likely be partially covered by taxpayers, it is crucial to assess whether the project</p>		<p><u>3. Confirmation of Funding</u></p> <p>The proposed Paardevlei Solar & BESS project received funding for the technical and financial feasibility assessment (including the EIA) from Integration Environment Energy GmbH & GIZ/C40 CFF.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>offers sufficient value. Does the land usage, the cost of solar energy generation, and the expected power output justify the financial investment?</p> <p><u>4. Mandatory mitigations or mere recommendation?</u></p> <p>Area 1 is located within a critically endangered region. After reviewing the proposed mitigation measures, I acknowledge that, if implemented correctly, they could significantly reduce the associated risks. However, I would appreciate further clarification on the enforceability of these measures. Specifically, are the proposed mitigation recommendations intended to be mandatory, or are they merely advisory? Additionally, what assurances are in place to guarantee the precise execution of these measures?</p> <p>In the event of non-implementation, what are the consequences? Who will be held accountable for the failure to enforce these measures, and will the penalties extend beyond fines to include potential legal action or imprisonment?</p> <p>It is crucial that the mitigation recommendations be framed as mandatory requirements, accompanied by a clear outline of the consequences for non-compliance. This would ensure greater accountability and a more robust approach to preserving this critical ecosystem.</p> <p><u>5. Land Use and Environmental Impact Considerations</u></p> <p>The current land use has significant ecological value from a natural perspective. It includes critically important and endangered ecosystems such as the Cape Flats Dune Strandveld and the Cape</p>		<p><u>4. Mandatory mitigations or mere recommendation</u></p> <p>The mitigation measures as recommended by the various Specialists for the proposed development Areas will form part of the Environmental Authorisation and Environmental Management Programme (EMPr) and therefore legally binding conditions to be implemented by the Project Applicant / EA Holder on the Solar & BESS development site (during the construction and operational phases of the development). The implementation of the EMPr (with the stipulated Specialist mitigation measures) will be audited by an Environmental Control Officer on the development site on a regular basis.</p> <p><u>5. Land Use and Environmental Impact Considerations</u></p> <p>Both the Ecological and Wetland Specialists have designated no-go areas for the Solar & BESS development, where ecologically significant features need to be conserved. Please</p>


COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>Flats Sand Fynbos. Additionally, the Boland Granite Fynbos is a dominant feature of the area. Notably, the Cape Pea flower, an endangered species, is prevalent, as highlighted in Mora's report (page 41).</p> <p>Vegetation Unit 1 plays a vital role in the development of wetland habitats by creating a pond that supports wetland vegetation. The area is also home to diverse and beautiful grassland vegetation. Furthermore, aquatic microhabitats have formed, contributing to the overall biodiversity of the site. Wetland "no-go" areas have been identified to help preserve these sensitive environments. While there is some presence of alien invasive species and a pocket of contaminated land, the overall landscape remains ecologically rich and aesthetically valuable.</p> <p>In your report, you mentioned that Paardevlei wetland and its associated wetlands currently do not hold Ramsar status. Given the ecological significance of this area, why have we not pursued this designation? Obtaining Ramsar status could be incredibly beneficial, offering international recognition and ensuring long-term conservation of the entire region. The primary goal should be to safeguard this valuable ecosystem for future generations.</p> <p>Your response to my third point about Fauna and Flora emphasizes that the solar project aims to provide a more sustainable form of electricity generation. While this is true in certain contexts, sustainability is highly dependent on the specific circumstances. Solar power, for instance, does not produce air pollution like coal plants, and it avoids issues like the long-term storage and maintenance of nuclear waste associated with nuclear energy.</p> <p>However, solar energy requires significantly more land area to</p>		<p>see the Consolidated Environmental Sensitivity Map attached as Appendix A2a to the Final EIA Report.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>achieve comparable energy outputs to coal or nuclear power. This extensive land use often results in the loss of valuable ecosystems, which is inherently unsustainable. The environmental trade-offs must be critically evaluated.</p> <p>Below is a comparison of the land-use efficiency and environmental impacts of nuclear, solar PV, and onshore wind energy:</p> <p><u>Nuclear Fission:</u> A standard nuclear reactor is rated at 1,000 megawatts (MW), representing its installed power capacity. Such a facility typically occupies around 259 hectares of land. According to the U.S. Energy Information Administration (EIA)⁹, nuclear energy achieved the highest capacity factor among all electricity generation sources in 2023, operating at full power 93% of the time. This efficiency enables a nuclear plant to produce approximately 8.15 terawatt-hours (TWh) of electricity annually.</p> <p>Based on the EIA's data, the average U.S. homeowner consumes 10,500 kilowatt-hours (kWh) of electricity annually, with South Africa's average being lower. This output allows a single 1,000 MW nuclear reactor to supply electricity to over 776,190 homes annually, demonstrating nuclear energy's significant capacity to power densely populated areas efficiently.</p> <p><u>Solar PV:</u> A 1 MW solar PV array typically requires an average of 2.4 hectares of land, as per the Solar Energy Industries Association (SEIA10). Based on the U.S. EIA, solar PV systems had a capacity factor of</p>		<p><u>Nuclear Fission:</u> The City of Cape Town (Project Applicant) considers a nuclear energy alternative as not feasible for the specific project area (Paardevelei site). Nuclear energy also presents its own series of significant environmental and safety impacts if not managed adequately. A lengthy permitting process through the National Nuclear Regulator (NNR) before a developer can secure a licence to establish a nuclear plant. The establishment of a renewable energy facility is a more feasible and less timeous development option.</p> <p><u>Solar PV:</u> The renewable energy alternative (Solar PV) for the Paardevlei site is considered by the City of Cape Town (Project Applicant) as a more technically & financially feasible option compared to</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>0.232 in 2023, meaning they operated at full capacity for only 23.2% of the year. Consequently, a 1,000 MW solar PV installation would generate approximately 2.032 TWh of electricity annually, which is sufficient to supply power to around 193,523 homes.</p> <p>However, to achieve this output, a solar PV plant of this scale would require approximately 2,428 hectares of land. This equates to 9.4 times the land area required for a 1,000 MW nuclear facility. Despite occupying significantly more land, a 1,000 MW solar PV farm powers 582,667 fewer homes.</p> <p><u>Onshore Utility-Scale Wind</u></p> <p>A typical utility-scale wind turbine occupies about 32 hectares of land and is commonly rated at 2.5 MW per turbine¹¹. A 1,000 MW onshore wind farm would require about 400 turbines occupying 12 950 hectares of land. According to the EIA, wind turbines in the U.S. operated at full power capacity 33.2% of the time in 2023. This results in an annual electricity generation of approximately 2.91 TWh/year, sufficient to power around 277,143 homes. It therefore required 50 times more land than nuclear while powering 499,047 fewer homes.</p> <p>The proposed Paardevlei Solar PV project aims to generate between 54 and 69 MW of power. Based on calculations using the upper limit of 69 MW, the plant would produce approximately 0.1402 TWh of electricity annually, sufficient to supply power to around 13,353 households.</p>		<p>the establishment of a nuclear plant.</p> <p><u>Onshore Utility-Scale Wind</u></p> <p>The renewable energy alternative (Solar PV) for the Paardevlei site is considered by the City of Cape Town (Project Applicant) as a more technically & financially feasible option compared to the establishment of a Wind Energy Facility.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>According to the City of Cape Town, there were 1,452,845 households recorded in 2022. This means the project would power only about 0.92% of all households in the municipality.</p> <p>The proposed trade-off is alarming: sacrificing 72 hectares of critical “greenbelt” land—a resource rich in ecological and aesthetic value—to generate power for a mere 0.92% of households in the City of Cape Town. This disproportionate exchange highlights the glaring inadequacy of the proposed solar plant’s output relative to the environmental cost, rendering the decision not only unjustifiable but shockingly shortsighted.</p> <p>6. <u>Devaluation of Properties</u></p> <p>Research¹² indicates that houses located within a kilometre of a utility-scale solar farm experience, on average, a 1.5% decrease in resale value compared to homes situated further away. This finding could be concerning for property owners in Somerset West and Strand. As such, it is essential to recognise all local residents as stakeholders in this process. Engaging the community for their input is vital to ensure that their concerns are addressed, particularly given the potential financial implications of the proposed solar developments.</p> <p>While I acknowledge that the legal requirements for placing public notices have been followed, these methods appear increasingly outdated. For example, how many affected residents regularly visit libraries to check notice boards? How many make a point of visiting the project site—where they have no current interest—just to review notices? Similarly, how many affected residents purchase</p>		<p>6. <u>Devaluation of Properties</u></p> <p>The Solar & BESS project is proposed on City of Cape Town land, situated on the western boundary of the greater Paardevlei site and will not be located near existing residential areas.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>and read publications like Die Burger or the District Post?</p> <p>The City of Cape Town already communicates directly with homeowners in the area through monthly municipal bills. Would it not be more effective and equitable to send such notices via email or postal mail to ensure broader awareness and engagement? Or are you simply doing the bare minimum to keep the majority of residents uninformed about a project of this magnitude that directly affects them?</p> <p><u>7. Glare</u></p> <p>In earlier comments, I noted that the Impact Assessment lacked meaningful engagement with interested and affected parties. Could you clarify how all impacted residents were informed and given the opportunity to express their opinions and concerns? What methods were used to ensure comprehensive outreach? Who exactly were part of this assessment?</p> <p>On my way back from work one day, I observed a striking glare from solar panels installed on residential rooftops, as shown in this image:</p>		<p><u>7. Glare</u></p> <p>The Public Participation Process was completed in terms of Chapter 6 of the NEMA EIA Regulation (2014, as amended) requirements.</p> <p>The Visual Impact Assessment (<i>Appendix B5 of the Final EIA</i>) and Glint and Glare Assessment (<i>Appendix B7 of the Final EIA</i>) completed for the proposed Paardevlei Solar & BESS project have recommended management and mitigation measures to limit the negative visual and glint & glare impacts.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<div></div> <p>This is maybe 1 hectare at the very most. Given this noticeable visual impact, how can residents reasonably be expected to believe that a solar installation spanning 72 hectares will not have significant visual implications?</p> <p>Given the geography, with Helderberg’s residential areas situated on the mountain slopes overlooking Paardevlei and the ocean, the visual impact of a 72-hectare solar farm cannot be ignored.</p> <p><u>List of Concerns:</u></p> <ol style="list-style-type: none">1. The Ecological Specialist says the development applicant should consider conducting a pre-construction site assessment. However, I believe this may be too late in the process. Shouldn’t the assessment be completed prior to the proposal’s approval?2. Preliminary Avifaunal Assessment: You mentioned that the proposed solar project is not considered a high-risk project; however, there is limited research on the potential impact		<p><u>List of Concerns:</u></p> <ol style="list-style-type: none">1. A detailed ecological assessment (before construction commences) can occur, after the detailed design of the Solar & BESS facility has concluded and the exact footprint to be impacted, is known.2. The Avifaunal Specialist has already designated an avifauna sensitive area as a no-go area for the proposed Solar & BESS project – please see the consolidated Environmental Sensitivity Map attached as Appendix

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>of solar plants on bird populations.¹³ Jeffrey Lovich, a research ecologist with the US Geological Survey, has highlighted concerns that certain solar panels can create intense heat capable of incinerating insects and even burning the feathers of birds that fly through the area.¹⁴ The Paardevlei Wetland houses nearly 200 bird species,¹⁵ including the near threatened Lesser Flamingo, may be particularly vulnerable to such effects.¹⁶ As noted in an article from Green Coast,¹⁷ large-scale solar farms can pose significant risks to local bird populations. Fatalities have been documented at sites like Ivanpah Solar, where birds have been found dead near the facility, potentially due to intense reflected sunlight from the panels. Such incidents raise concerns about the broader ecological implications of installing solar farms in areas with rich avifaunal biodiversity.</p> <p>It is crucial that further studies be conducted to fully understand the potential risks to local wildlife and to mitigate these impacts effectively.</p> <p>3. Flood risk: The terrestrial impact assessments conducted by Mora in September and December 2023 occurred outside of the winter season, which is critical for accurately assessing flood risks. While the proposed mitigation measures are intended to address these concerns, the area remains highly susceptible to flooding, particularly during the rainy season. The impact of these risks on soil stability</p>		<p>A2 to the Final EIA.</p> <p>3. It is proposed that the Solar & BESS project be integrated into the Master Stormwater Plan for the greater Paardevlei site. It is also recommended that a detailed stormwater management plan for the Solar & BESS project be developed during the detailed design phase of the project (to limit any flooding risks).</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>could result in significant increases in both installation and ongoing maintenance costs.</p> <p>The potential for flooding could lead to costly measures being implemented to protect infrastructure, soil integrity, and long-term viability. Given the scale of these anticipated costs, the question arises: will taxpayers be held accountable for covering these expenses? The financial burden on the public should be carefully considered, especially when the costs of addressing flood risks may be considerable. Further studies and projections, ideally conducted during the rainy season, would provide more accurate insights into the severity of the flooding risk and its associated costs.</p> <p>4. Decommissioning: There have been no studies conducted regarding the decommissioning process for the proposed solar power plant. Decommissioning a 69MW solar plant involves significant costs, with estimates ranging from R0.54 to R3.61 per watt¹⁸. These costs cover the removal and recycling of solar panels, disposal of hazardous materials, site restoration, and the associated labour. For a 69MW plant, this could result in decommissioning costs between approximately R37,319,823 and R248,798,824, depending on factors such as site location, materials used, and the complexity of the decommissioning process. The question arises—will taxpayers bear this considerable cost? Moreover, given the substantial costs involved, why has no information been provided in the reports regarding this</p>		<p>4. At this stage, the Project Applicant (City of Cape Town) has not assessed the decommissioning phase of the Solar & BESS project, as it is the intention that the facility remain operational and supply Somerset West with power for the next 20 years to come.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>crucial aspect of the project.</p> <p>As per my previous letter, I will again highlight alternatives:</p> <p>1. <u>Proposal for Rooftop Solar Installation with Centralised Battery Storage</u></p> <p>Given the importance of preserving the Paardevlei wetlands, which contain endangered species and critical ecosystems, I propose an alternative solution to the proposed solar PV plant. Instead of disrupting the delicate balance of this unique environment, we could install solar panels on rooftops in the surrounding area. This approach would significantly reduce the land use required for solar power generation while contributing to the overall renewable energy goals of the region.</p> <p>To complement rooftop solar installations, I recommend placing the necessary energy storage batteries at the existing 132kV substation. This location would provide a strategic point for storing excess solar energy and facilitating the management of intermittent power generation, without the need to use additional land or disturb sensitive ecological areas.</p> <p><u>1.1. Benefits of This Approach:</u></p> <p>1.1.1. Minimising Land Use: By utilising rooftops, we reduce the need for large tracts of land, preserving valuable ecosystems such as the Paardevlei wetlands.</p> <p>1.1.2. Energy Storage Integration: Installing batteries at the</p>		<p>1. <u>Proposal for Rooftop Solar Installation with Centralised Battery Storage</u></p> <p>The amount of electricity generated by a dedicated solar facility on a portion of vacant land versus individual panels scattered over various roof tops is more substantial. The Project Applicant (City of Cape Town) is looking at a facility to produce between 30 – 60 MW of electricity, this amount of power would not be feasible from a series of individual roof top solar panels.</p> <p><u>1.1. Benefits of This Approach:</u> Noted.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>substation would enhance the storage of surplus solar energy, supporting grid stability and reducing reliance on fossil fuels during peak demand periods. This approach can effectively support the growing solar capacity in the region.</p> <p>1.1.3. Lower Environmental Impact: This method avoids the significant environmental cost of clearing land for a large solar plant, especially in an area with endangered fauna and flora.</p> <p>1.1.4. Sustainable Grid Management: By consolidating energy storage at the substation, we can provide a centralised and efficient method of balancing solar generation with grid demand, contributing to overall grid stability and efficiency.</p> <p>Leverage the grants you have secured to install solar panels on low-income apartment blocks, state-owned buildings, schools, hospitals, and similar public facilities. For middle and high-income households and businesses, consider offering a rent-to-own model, ensuring that the financial burden does not fall on taxpayers. This approach would allow for widespread adoption of solar energy without requiring taxpayer funding for the installation costs.</p> <p>You mentioned that generating 30-60 MW of electricity from individual rooftops would not be feasible, but I respectfully disagree. Here is evidence on how it can be successful:</p> <p>a. South Africa: Eskom’s Generation Adequacy Report¹⁹ highlights the rapid growth of rooftop solar capacity in the country. It increased from 2,264 MW in July 2022 to an impressive 5,440 MW</p>		

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>by March 2024—a clear indication of the potential for significant energy generation through rooftop solar systems.</p> <p>b. Western Australia: Rooftop solar systems contribute approximately 80.5% of the electricity generated by the South West Interconnected System, the state’s main power grid. This success is supported by the adoption of solar by around 4 million households, showcasing the feasibility of rooftop solar as a substantial power generation source.²⁰</p> <p><u>2. Develop Paardevlei into a Conservation Area</u></p> <p>Paardevlei already holds significant ecological value, supporting critically important and endangered wetland ecosystems. If the goal is to continue addressing climate change and offsetting emissions, it is essential that we prioritise the preservation of these ecosystems. Paardevlei is not a brownfield site, and therefore, it is not suitable for solar development.</p> <p>As highlighted in my second point, it has been shown that plants are absorbing 31% more CO₂ than previously estimated. A more effective solution would be to utilize the 72 hectares to establish a beautifully designed greenbelt, featuring indigenous species such as the endangered Renosterbos, Kreefbos, Buchu, Milkwood, Proteas, and Restio species. This would enhance carbon sequestration, soil stabilization, and encourage eco-tourism, creating employment opportunities while safeguarding our natural heritage for future generations.</p> <p>In conclusion, I oppose the City of Cape Town’s application for the</p>		<p><u>2. Develop Paardevlei into a Conservation Area</u></p> <p>It is the intent of the City of Cape Town, as the Project Applicant, to keep any development outside of the ecologically sensitive areas within the greater Paardevlei site.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>solar plant at Paardevlei due to the fact that the area is not a brownfield site. This land holds significant ecological value and must be preserved. The proposed development would sacrifice critical greenbelt land for energy production, a move that would irreversibly impact the surrounding environment and biodiversity. Given that alternative solutions, such as rooftop solar installations and centralised battery storage, could provide a more sustainable approach without compromising precious natural areas, I urge the City to explore these options instead.</p> <p>It is essential that we protect Paardevlei's wetlands and fynbos, which provide invaluable ecological benefits. I trust that the City will reconsider this proposal in favour of preserving this vital ecosystem for future generations. Thank you for your time and consideration.</p>		
<i>Commenting Authority: South African Civil Aviation Authority (SACAA)</i>		
<p>Good day,</p> <p>I hope this email finds you well.</p> <p>The screening tool indicates that the proposed development has low sensitivity to civil aviation activities and operation, which mean that the proposed development may have no negative impacts toward aviation infrastructure and activities within the airport. However, a formal obstacle assessment is required for the proposed development as it includes the establishment of solar photovoltaic, overhead powerlines and associated infrastructure. Kindly lodge an</p>	<p>Nrateng Mashiloane</p> <p>SACAA</p> <p>(Comment dated 28/10/2024)</p>	<p>Noted, the City of Cape Town, as the Project Applicant, will lodge a separate application to SACAA for their approval.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES										
<p>application as published on the SACAA website: www.caa.co.za/industryinformation/obstacles/. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: www.caa.co.za.</p> <p>Kind regards,</p>												
Commenting Authority: Department of Agriculture												
<p>Hi Mr. Jonas,</p> <p>With regards the status of your application. Kindly note that the request is number 115 in the queue – see table below. We work on a first in first out basis. Our office is committed to an estimated turnaround time of 90 days (3 months). In the event of unforeseen circumstances, complexity of applications received, number of site visits required and engagements with relevant stakeholders this time might be extended. We will try our utmost to provide a response within the 90 days.</p> <table><tr><td>App number</td><td>Applicant</td><td>Type of Application</td><td>Farm No.</td><td>District</td></tr><tr><td>115</td><td>JG Afrika</td><td>Other</td><td>Paardevlei Solar PV & Battery Energy Storage System</td><td>Somerset West</td></tr></table> <p>With many thanks and kind regards</p>	App number	Applicant	Type of Application	Farm No.	District	115	JG Afrika	Other	Paardevlei Solar PV & Battery Energy Storage System	Somerset West	<p>Brandon Layman</p> <p>Department of Agriculture</p> <p>(Comment dated 19/11/2024)</p>	<p>Noted.</p>
App number	Applicant	Type of Application	Farm No.	District								
115	JG Afrika	Other	Paardevlei Solar PV & Battery Energy Storage System	Somerset West								
Interested and Affected Party: Friends of Paardevlei												
<p>Yes thanks for checking in Ryan, we will be checking and commenting before the end of the week.</p>	<p>Tiffany Schultz</p> <p>Friends of Paardevlei</p> <p>(Comment dated</p>	<p>Noted, thanks.</p>										

COMMENTS	I&AP	PROJECT TEAM RESPONSES
	18/11/2024)	
<i>Interested and Affected Party: Paardevlei Lifestyle Estate</i>		
<p>Good day</p> <p>Thank you for your email. We will distribute to our Residents.</p>	<p>Bonnie Earle</p> <p>Paardevlei Lifestyle Estate</p> <p>(Comment dated 14/11/2024)</p>	<p>Noted, thanks.</p>
<i>Interested and Affected Party: Derek Lloyd</i>		
<p>Good day.</p> <p>I own property at Paardevlei Lifestyle Estate and received the proposed solar plan to comment on.</p> <p>Please indicate a couple of times your are free to take a teams call, either tomorrow or Thursday as I require some clarity.</p>	<p>Derek Lloyd</p> <p>Interested and Affected Party</p> <p>(Comment dated 19/11/2024)</p>	<p>Hi Derek,</p> <p>Thank you for your email.</p> <p>I'm available on Thursday morning (21 November) for a Teams call. Let me know what time suits you?</p> <p>Regards,</p> <p>Ryan</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<i>Interested and Affected Party - Simone Prinsloo</i>		
<p>Dear Ryan,</p> <p>Thank you for the opportunity to comment.</p> <p>We're cutting away at the natural environment bit by bit. It is difficult to fathom that clearing of endangered and critically endangered vegetation is even considered. They should not be destroyed at all, every square meter should be replanted and rehabilitated.</p> <p>The avoidance of contaminating the surrounding wetlands and soil should be strictly followed. The ecological specialist suggested an ECO to be appointed on site at least once a week for the full duration of construction, this needs to be implemented. There should be a post construction monitoring plan as well. All individuals involved on this site should be committed to a conservation approach of practice and be mindful of pollution and damage to the environment, I would recommend they undergo training and strict monitoring. I would like to reiterate the recommendations that the specialist made that in my opinion undoubtedly should be followed and policed. Such as a biodiversity protocol and rehabilitation plan. The actual footprint of disturbance must be kept to a minimum and as much of the natural environment must be conserved.</p> <p>The project will be aesthetically unappealing, this would affect numerous property values where the site is in view. I would suggest if possible, the project be screened on the upper end by a diversity of indigenous trees and plants, this could create an aesthetic</p>	<p>Simone Prinsloo</p> <p>Interested and Affected Party</p> <p>Comment dated 21/11/2024</p>	<p>Noted.</p> <p>Correct, an ECO will be appointed to monitor the Project Developer's compliance with the implementation of all of the Specialist's mitigations and EMPr conditions.</p> <p>It is also recommended by the Ecological Specialist that a detailed pre-construction ecological assessment of the final approved site development footprint (after the detailed design phase is concluded) be conducted. Fauna and flora species of conservation concern will be identified during this assessment / survey and translocated to a suitable receptor area.</p> <p>Noted.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>barrier. It would also be beneficial to plant vegetation in between the solar panel sections.</p> <p>I would like to note page 159 of the report has no proposed mitigation.</p> <p>On a side note a 3D model would help the public as a whole to envision the project.</p>		
<i>Interested and Affected Party - David Blundell</i>		
<p>Dear Ryan,</p> <p>Can you please add me as an I&AP on the above-mentioned project?</p> <p>Thanks and regards,</p>	<p>David Blundell</p> <p>Interested and Affected Party</p> <p>(Comment dated 22/10/2024)</p>	<p>Hi David,</p> <p>Yes, will do.</p> <p>Thanks</p> <p>Ryan</p>
<i>Interested and Affected Party - Cherise van der Berg</i>		
<p>Good day Jonas</p> <p>Hope you have been well.</p> <p>I live in the Paardevlei Lifestyle Estate, moved in this week, and we received the email regarding the Solar and Battery Energy Storage System Project, I would like to know if you already have quotes for this or can I also put a quote forward?</p>	<p>Cherise van der Berg</p> <p>Interested and Affected Party</p> <p>(Comment dated 15/11/2024)</p>	<p>Hi Cherise,</p> <p>Thank you for the email.</p> <p>This project is still in feasibility stage and still needs to obtain all the relevant permits for approval before actual implementation. The City of Cape Town is aiming to start construction of the project in 2026.</p>

COMMENTS	I&AP	PROJECT TEAM RESPONSES
<p>Nashua is 50 years old and we have our team that does this side of the business. I can also send you references and client names we are busy with.</p> <p>Please can you let me know if we can also get involved in the proposal side.</p> <p>Looking forward to hearing from you.</p> <p>Have a blessed weekend.</p>		<p>I can keep you up to date on the project progress?</p> <p>Regards,</p> <p>Ryan</p>
<i>Interested and Affected Party - Judy Brower</i>		
<p>Dear Ryan</p> <p>Please can you update your contact details - not sure why you have [REDACTED] - but</p> <p>please change to [REDACTED] -</p> <p>thank you</p> <p>Judy</p>	<p>Judy Brower</p> <p>Interested and Affected Party</p> <p>(Comment dated 14/11/2024)</p>	<p>Will do, thanks Judy.</p>