



**SITE SENSITIVITY VERIFICATION REPORT FOR THE PROPOSED
DEVELOPMENT OF A SOLAR FARM, ON FARM NR: 438,
BRAKFORTEIN ESTATE, CITRUSDAL, WESTERN CAPE.**

Date: July 2026

SEC REFERENCE: 025 091

DEA&DP REF: TBC

1. Introduction & Legislative Context

BACKGROUND

In terms of the Protocols for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes (referred to hereafter as "the Protocols"), published under Government Notice No. 320 in Government Gazette No. 43110 on 20 March 2020, a Site Sensitivity Verification (SSV) Report must be compiled and submitted with every application lodged after the Protocols came into effect on 9 May 2020.

The purpose of the SSV Report is to: (i) verify the land use and environmental theme sensitivities identified by the National Web-Based Environmental Screening Tool (Appendix A); (ii) confirm or dispute the assigned sensitivity ratings and provide supporting motivations where alternative sensitivities are proposed; and (iii) motivate the requirement for, or exclusion of, specialist assessments identified by the Screening Tool.

This Site Sensitivity Verification Report (SSVR) has been prepared in accordance with the requirements of the National Web-Based Environmental Screening Tool and the associated Protocols published in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998). The sensitivity ratings assigned by the Screening Tool have been verified through a combination of desktop analysis, satellite imagery, site inspections, and the findings of completed specialist assessments. Where sensitivities have been refined, these refinements are supported by site-specific observations, specialist investigations, and the available environmental information.

METHODOLOGY

In terms of the Protocols, the EAP is required to verify the site's environmental sensitivity in accordance with the environmental themes and specialist assessment requirements identified by the National Web-Based Environmental Screening Tool (Appendix A). This process assists in determining the applicability of the National Environmental Management Act, 1998 (Act No. 107 of 1998), and the Environmental Impact Assessment Regulations, 2014 (as amended), to the proposed development.

This SSV Report has been compiled based on desktop studies, satellite imagery, site inspections, and the findings of the completed specialist assessments undertaken for the proposed development. The environmental sensitivities identified by the National Web-Based Environmental Screening Tool have been verified and, where appropriate, refined based on site-specific investigations and specialist input. This report has been prepared by the EAP and must be read in conjunction with the Draft Basic Assessment Report (BAR), the National Web-Based Environmental Screening Tool Report (Appendix A), the completed specialist reports, and all other supporting documentation submitted as part of the Basic Assessment Application.

PROJECT DESCRIPTION

The proposed development entails the construction and operation of a solar photovoltaic (PV) energy facility with a combined generation capacity of approximately 3.651 MWp, to be located on Mouton Citrus, Farm No. 438, near Citrusdal within the Cederberg Municipality, Western Cape.

The proposed solar PV facility is situated immediately south/south-east of an existing agricultural and industrial complex on the farm, comprising large warehouse-type structures, portions of which are already fitted with rooftop solar PV panels. The proposed development footprint is located on previously disturbed agricultural land that is currently vacant and no longer actively cultivated.

Ground-Mounted PV Facility

- Rows of solar PV panels mounted on fixed-tilt structures at approximately 20°, covering an area of approximately 27 297 m².
- Installed capacity of approximately 2.502 MWp DC (1.98 MWac).

Rooftop PV Facility

- Supplementary rooftop-mounted solar PV panels contributing to the overall generating capacity of the facility.

Battery Energy Storage System (BESS)

1. A 4.308 MWh Battery Energy Storage System (Sungrow Power Titan 2.0 with a 2.5 MW PCS).
2. The BESS will store excess electricity generated by the facility and provide electricity during periods of peak demand or grid interruptions.

Associated Infrastructure

- Inverters and transformers.
- Two new 1 250 kVA medium-voltage (MV) substations, each fitted with three-way ring main units (RMUs).
- Approximately 4 000 m of underground MV cabling connecting the facility to the local electricity distribution network.
- A small control, operations and maintenance building.
- Internal gravel access roads.
- Perimeter security fencing and low-level security lighting.

The layout and positioning of the proposed infrastructure have been informed by the findings of the completed specialist assessments and have been designed, where practicable, to avoid environmentally sensitive features and minimise potential environmental impacts.



Figure 1: Locality map of the study site.

The proposed development triggers **Activity 28 of Listing Notice 1 (GN R.327 of 2017, as amended)**, published in terms of the Environmental Impact Assessment Regulations, 2014 (as amended), under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA). Accordingly, the proposed development requires Environmental Authorisation through the Basic Assessment process.

Sillito Environmental Consulting (Pty) Ltd (SEC) has been appointed as the independent Environmental Assessment Practitioner (EAP) to undertake the Basic Assessment process and manage the environmental authorisation application for the proposed solar photovoltaic (PV) facility on Farm No. 438, Brakfontein Estate, near Citrusdal, Western Cape.

Regulation 16(1)(v) of the Environmental Impact Assessment Regulations, 2014 (as amended), requires that a Site Sensitivity Verification Report accompany every application for Environmental Authorisation. In accordance with these requirements, the National Web-Based Environmental Screening Tool Report was generated and the environmental sensitivities identified by the Screening Tool were verified through this assessment.

The Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes, published in terms of Sections 24(5)(a), 24(5)(h) and 44 of NEMA on 20 March 2020, prescribe the requirements for undertaking site sensitivity verification and set out the minimum reporting requirements for the identified environmental themes.

In accordance with these Procedures, the environmental sensitivities identified by the National Web-Based Environmental Screening Tool have been verified through desktop investigations, site inspections and the findings of the completed specialist assessments. This Site Sensitivity Verification Report has therefore been prepared in accordance with the applicable Protocols and satisfies the requirements for submission as part of the Basic Assessment Application.

2. Themes & Environmental Sensitivity Identified by Screening Tool

The table below indicates the level of sensitivity of each of the themes identified in the National Web-based Screening Tool Report, dated September 2025:

Theme	Very High	High	Medium	Low
Agriculture Theme	✓			
Animal Species Theme			✓	
Aquatic Biodiversity Theme				✓
Archaeological & Cultural Heritage				✓
Civil Aviation Theme			✓	
Defence Theme				✓
Palaeontology Theme	✓			
Plant Species Theme			✓	
Terrestrial Biodiversity Theme	✓			

Table 1. Site sensitivity themes as identified by the DEA Screening Tool & Specialist Studies

Theme	DEA Sensitivity	Agree / Disagree	Proposed Sensitivity	Motivation
Agriculture Theme	Very High Sensitivity	Disagree	High Sensitivity	The DFFE Screening Tool assigns a Very High agricultural sensitivity. However, the Agricultural Assessment confirmed that, although the site is generally unsuitable for viable crop production, it remains suitable for rooibos cultivation and therefore retains High agricultural sensitivity. The specialist concluded that the proposed solar facility will result in a Low significance agricultural impact because it forms part of the existing farming enterprise's infrastructure and will support agricultural productivity by supplying electricity to the farming operation. The proposed development was therefore considered acceptable from an agricultural perspective.
Animal Species Theme	Medium Sensitivity	Disagree	Low Sensitivity	The Terrestrial Compliance Statement confirmed that no Species of Conservation Concern were recorded during the field survey and that their occurrence within the Project Area of Influence is considered unlikely. The specialist therefore disputed the Screening Tool rating and verified the Animal Species Theme as Low sensitivity.
Aquatic Biodiversity Theme	Low Sensitivity	Agree	Low Sensitivity	The Aquatic Biodiversity Compliance Statement confirmed that no natural wetlands occur within the proposed development footprint. Although an unchanneled valley-bottom wetland, stormwater channel and dam occur within the broader Project Area of Influence, these features are located outside the development footprint and can be adequately protected through implementation of the recommended 20 m buffer. The specialist therefore confirmed the Low Aquatic Biodiversity Theme sensitivity of the proposed development footprint and concluded that the project presents no fatal flaws from an aquatic biodiversity perspective.
Archaeological and Cultural Heritage Theme	Low Sensitivity	Agree	Low Sensitivity	Heritage Western Cape confirmed that there is no reason to believe the proposed solar PV facility will impact heritage resources and advised that no further action in terms of Section 38 of the National Heritage Resources Act is required. The Chance Finds Procedure remains applicable during construction.
Civil Aviation Theme	Medium Sensitivity	Disagree	Negligible Sensitivity	The proposed development is not located within the vicinity of any airport, safeguarded airspace or civil aviation infrastructure and is not expected to interfere with aviation operations. The Civil Aviation Theme is therefore considered to have Negligible sensitivity.

Defence Theme	Low Sensitivity	Disagree	Negligible Sensitivity	The proposed development is not located within or adjacent to any defence installations, military infrastructure or strategic defence areas and is therefore not expected to affect defence-related activities. The Defence Theme is accordingly assigned Negligible sensitivity.
Palaeontological Theme	Very High Sensitivity	Disagree	Medium Sensitivity	The DFFE Screening Tool assigns a Very High palaeontological sensitivity based on regional geological mapping. Following site verification and consideration of the proposed development footprint, the site-specific palaeontological sensitivity is considered to be Medium, based on the disturbed nature of the development footprint and the limited extent of excavation proposed. A standard Chance Finds Procedure will be implemented during construction.
Plant Species Theme	Medium Sensitivity	Disagree	Low Sensitivity	The Terrestrial Compliance Statement confirmed that the proposed development footprint is highly disturbed and supports Very Low terrestrial sensitivity, with no plant Species of Conservation Concern recorded during the field survey. The specialist therefore disputed the Screening Tool rating and verified the Plant Species Theme as Low sensitivity.
Terrestrial Biodiversity Theme	Very High Sensitivity	Disagree	Low Sensitivity	The Terrestrial Compliance Statement confirmed that the proposed development footprint comprises a disturbed environment with Very Low terrestrial biodiversity sensitivity, and that no Species of Conservation Concern were recorded or considered likely to occur. The specialist therefore disputed the Screening Tool rating and verified the proposed development footprint as having Very Low terrestrial biodiversity sensitivity, concluding that a Terrestrial Biodiversity Compliance Statement was appropriate in accordance with the Terrestrial Biodiversity Protocol.

3. Specialist Studies Identified by Screening Tool

The following Specialist Assessments have been identified by the Screening Tool, dated 10 September 2025:

1. Landscape/Visual Impact
2. Archaeological and Cultural Heritage Impact Assessment
3. Palaeontology Impact Assessment
4. Terrestrial Biodiversity Impact Assessment
5. Aquatic Biodiversity Impact Assessment
6. Hydrology Assessment
7. Socio-Economic Assessment
8. Plant Species Assessment
9. Animal Species Assessment

4. Motivation by the EAP Agreeing or Disputing the Specialist Assessments Identified in Screening Tool Report
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The following specialist studies, as identified by the Screening Tool Report, will not be carried out:

1. Landscape/ Visual Impact Assessment

The proposed development is located within an existing agricultural landscape associated with the Mouton Citrus farming operation and is of a relatively limited scale. The surrounding landscape is characterised by existing agricultural infrastructure, cultivated lands and associated farm buildings, which reduce the visual prominence of the proposed solar facility. The development is therefore not anticipated to result in significant visual impacts, and a standalone Visual Impact Assessment is not considered necessary.

2. Archaeological and Cultural Impact Assessment.

Heritage Western Cape confirmed that there is no reason to believe the proposed development will impact heritage resources and advised that no further studies are required in terms of Section 38 of the National Heritage Resources Act (Act No. 25 of 1999). An Archaeological and Cultural Impact Assessment is therefore not required. A Chance Finds Procedure should, however, be implemented during construction should previously unidentified heritage resources be encountered.

3. Palaeontology Impact Assessment

The proposed development is located within a previously disturbed agricultural area that has been subjected to long-term cultivation, resulting in substantial disturbance of the upper soil profile. The proposed solar facility will require only shallow excavations for panel supports and associated infrastructure, thereby limiting the potential to disturb intact fossil-bearing geological formations. Any previously unidentified palaeontological resources encountered during construction can be adequately managed through the implementation of a Chance Finds Procedure. A standalone Palaeontological Impact Assessment was therefore not considered necessary.

4. Hydrology Assessment

The proposed development does not entail the abstraction, diversion or impoundment of water, nor is any development proposed within a natural watercourse or wetland. The development footprint has been positioned outside identified aquatic features, and no activities are anticipated that would significantly

alter surface water flow or the hydrological functioning of the surrounding environment. Potential stormwater runoff will be managed through appropriate engineering design and implementation of standard stormwater management measures. A standalone Hydrological Assessment was therefore not considered necessary.

5. Socio-economic Assessment

The proposed development is not anticipated to result in significant adverse socio-economic impacts. The project will provide positive socio-economic benefits through temporary employment opportunities during construction and by supporting the continued operation and resilience of the existing agricultural enterprise through improved energy security. A standalone Socio-Economic Assessment is therefore not considered necessary.

b) The following assessments have been identified by the Screening Tool Report to be carried out. The Competent Authority must please advise if they agree or dispute these findings.

1. Terrestrial (Plant & Animal) Species Compliance Statements

The DFFE Screening Tool assigned the site a Medium Plant Species Theme sensitivity and Medium Animal Species Theme sensitivity. A Terrestrial Biodiversity Compliance Statement was undertaken to verify these sensitivities. The specialist confirmed that the proposed development footprint comprises a previously disturbed agricultural area with low ecological integrity and verified both the Plant Species Theme and Animal Species Theme as Low sensitivity. No Species of Conservation Concern were recorded during the field assessment, and the specialist concluded that the proposed development is acceptable from a terrestrial biodiversity perspective.

2. Agricultural specialist assessment Compliance Statement

The DFFE Screening Tool assigned the site a Very High Agricultural Theme sensitivity. An Agricultural Agro-Ecosystem Specialist Assessment was undertaken to verify the agricultural sensitivity of the site. The specialist confirmed that, although the site is generally unsuitable for most crop production due to climatic and soil limitations, it remains suitable for rooibos cultivation and therefore verified the site as having High agricultural sensitivity. The specialist further concluded that the proposed development would result in a Low significance agricultural impact, as the solar facility forms part of the existing farming enterprise and will support the continued agricultural operation through improved energy security.

5. Conclusion

This Site Sensitivity Verification Report has been prepared in accordance with the Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes, published in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), and the associated Environmental Theme Protocols.

The environmental sensitivities identified by the National Web-Based Environmental Screening Tool have been verified through desktop investigations, site inspections and the findings of the completed specialist assessments. Where appropriate, the Screening Tool sensitivities have been refined based on site-specific environmental conditions and specialist input.

The completed specialist assessments confirmed that:

- the Agricultural Theme should be verified as High sensitivity, rather than the Screening Tool's Very High sensitivity;
- the Animal Species Theme and Plant Species Theme should be verified as Low sensitivity;
- the Aquatic Biodiversity Theme and Archaeological and Cultural Heritage Theme are appropriately classified as Low sensitivity;
- the Terrestrial Biodiversity Compliance Statement verified the proposed development footprint as comprising a previously disturbed agricultural area of Very Low terrestrial biodiversity sensitivity, with no Species of Conservation Concern recorded during the field assessments; and
- no further heritage studies are required, subject to implementation of a Chance Finds Procedure during construction.

The specialist investigations further confirmed that the proposed development footprint has been appropriately positioned to avoid environmentally sensitive features where practicable and that the identified environmental impacts can be effectively avoided, minimised and managed through the implementation of the recommended mitigation measures and Environmental Management Programme (EMPr).

Based on the findings of this Site Sensitivity Verification Report and the completed specialist assessments, it is concluded that the verified environmental sensitivities of the proposed development footprint have been appropriately characterised and that the proposed development is suitable to proceed through the Basic Assessment process.

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