PROPOSED GRID CONNECTION INFRASTRUCTURE, DAMLAAGTE SOLAR PV FACILITY: DRAFT BASIC ASSESSMENT REPORT, FREE STATE PROVINCE

Prepared for: South Africa Mainstream Renewable Power

Developments

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EXECUTIVE SUMMARY

1. INTRODUCTION

1.1. Project Background

South Africa Mainstream Renewable Power Developments (Pty) Ltd (Mainstream) is proposing to develop, construct and operate four (4) solar photovoltaic (PV) facilities, including Battery Energy Storage Systems (BESS) and associated infrastructure, on a site located approximately 19 km west of the town Sasolburg in the Free State Province. The four (4) projects (including the grid connection infrastructure) are collectively referred to as the Scafell Cluster.

The associated grid connections for each facility of the Scafell Cluster are subject to separate Applications for Environmental Authorisation. A Basic Assessment (BA) process must be undertaken for each application. The grid connection considered in this Basic Assessment Report (BAR) is to facilitate the connection between the proposed 150 MW_{ac} Damlaagte Solar PV Facility¹ and the existing ESKOM Scafell Main Transmission Substation (MTS). Thus, this BAR is compiled for **the Damlaagte Solar PV Facility Grid Connection** (see Figure 1).

1.2. Purpose of this Report

This Draft BAR outlines the process followed as part of this application and presents the findings of the BA process undertaken for the proposed Solar PV Facility. The BAR has been compiled in accordance with Appendix 1 of the 2014 EIA Regulations (as amended) and is now being distributed for review and comment as part of the EIA process.

This Draft BAR is being made available for a 30-day review and comment period, from **23 September** to **25 October 2021**, in order to provide Interested and Affected Parties (I&APs) with an opportunity to comment on any aspect of the proposed project as well as the findings of the BA process to date. A copy of the Draft BAR (including appendices) has been made available on:

- the SLR website at http://slrconsulting.com/public-documents/mainstream-scafell;
- the corresponding data-free website, where the report can also be downloaded without any data charges using internet-capable mobile phones, at https://www.slrpublicdocs.datafree.co/public-documents/mainstream-scafell.

A hard copy of the report and appendices have also been placed at the following public locations / venues:

Name of Location	Contact Details
Sasolburg City Library	John Vorster Avenue, Sasolburg Tel: 016 973 8464 Fax: 016 976 3083 Email: sasolburg@sacr.fs.gov.za
Zamdela Public Library	3246 Taylor Park, Zamdela Tel: 016 974 2163 Fax: 016 976 0308 Email: zamdela@fslib.gov.za

¹ The Application for EA process for the Damlaagte Solar PV Facility is being undertaken separately (DFFE Reference: 14/12/16/3/3/2/2078).



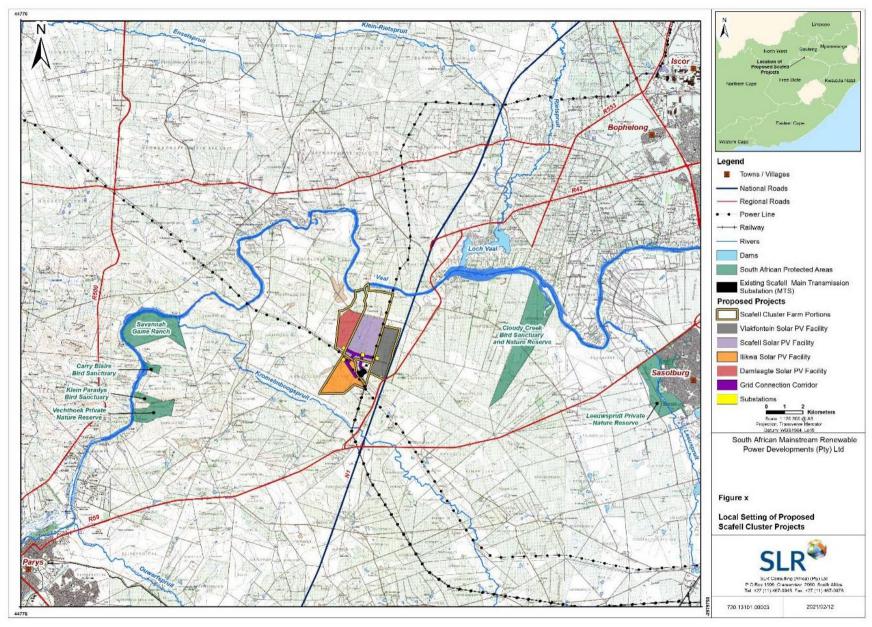


Figure 1: A Locality Map illustrating the location of the proposed Scafell Cluster Project



Comments should be forwarded to the SLR at the address, telephone or email address shown below². For comments to be included in the BAR, it is kindly requested that comments should reach SLR no later than

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7700

1.3. Summary of Authorisation Requirements

The EIA Regulations 2014 (as amended), promulgated in terms of Chapter 5 of NEMA provide for the control of certain listed activities. Such activities are prohibited from commencing until written authorisation is obtained from the competent authority, which in this case is the Department of Forestry, Fisheries and Environment (DFFE). The proposed project triggers the need for an BA process in order for DFFE to consider the application for Environmental Authorisation.

2. BASIC ASSESSMENT METHODOLOGY

2.1. Application for EA

25 October 2021.

An application for EA, in terms of NEMA, was submitted to the DFFE at the same time as making this Draft BAR for public review and comment.

2.2. Specialist Studies

Eight specialist studies were undertaken to address the key issues identified during the Scoping Phase, namely terrestrial ecosystems, avifauna, freshwater resources, heritage, traffic, soils and agricultural potential, social and visual. The specialist information and other relevant information have been integrated into this draft BAR, which also includes a Construction and Operation Environmental Management Programme (EMPr).

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The Draft BAR has been distributed for a 30-day review and comment period after which it will be updated into a Final BAR based on the comments received and in compliance with Appendix 3 of the EIA Regulations 2014 (as amended). The final BAR will then be submitted to DFFE for decision-making. After DFFE has reached a decision, all I&APs on the project database will be notified of the outcome of the application, the reasons for the decision and the statutory appeal process.

3. PROJECT DESCRIPTION

It is proposed that the Damlaagte Solar PV Facility Grid Connection would have a contracting capacity of up 132 kV and include a double circuit Transmission Line and a 33 / 132 kV Switching Station. Two grid connection corridors are being considered and assessed in this BAR to connect the proposed Damlaagte Solar PV facility to the national grid (see Figure 2):

- **Grid Routing Alternative 1 (Preferred)**: This corridor is 150 m wide and is approximately 2.0 km in length. The proposed grid connection is from the on-site substation (Switching Station) of the proposed Damlaagte Solar Facility located on Damlaagte RE/229 and extends for about 1 km in an easterly direction across Willow Grange 3/246 to before turning about 90° south for 0.6km across Scafell RE/448, then turning slightly southeast for 0.3 km before terminating at the ESKOM Scafell MTS. This is the shortest most direct route to connect to the ESKOM Scafell MTS.
- **Grid Routing Alternative 2**: This corridor is 150 m wide and is also approximately 2.5 km in length. This proposed grid connection starts at the on-site substation (Switching Station) of the proposed Damlaagte Solar Facility located on Damlaagte RE/229 and extends for about 0.6 km in an easterly direction across Willow Grange 3/246, then turns about 90° southwest for 0.7 km and then southeast for 0.9 km onto Procedeerfontein 5/100, and then turns northeast for 0.2 km before terminating at the ESKOM Scafell MTS located on Scafell RE/448.

Table 1 below includes technical and project-specific details of the key infrastructure components and support services that will be required to support the operations of the solar PV facility and grid connection infrastructure for a 20-year period.

Table 1: Technical details of the proposed project

Component		Damlaagte Grid Connection
Property Corridor Alternative 1 details: (Preferred)		Damlaagte 229 Remaining Extent Willow Grange 246 Portion 3 Scafell 448 Remaining Extent
	Corridor Alternative 2	Damlaagte 229 Remaining Extent Willow Grange 246 Portion 3 Scafell 448 Remaining Extent Proceederfontein 100 Portion 5



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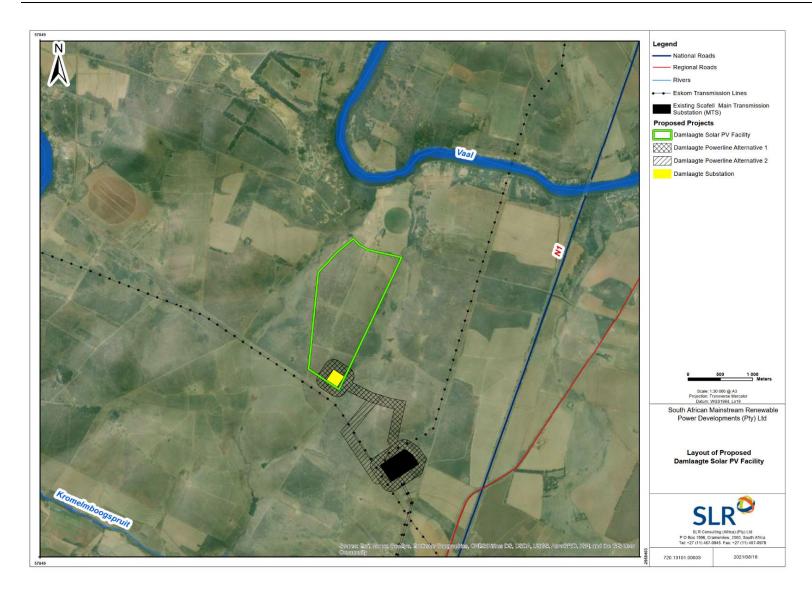


Figure 2: Locality Map for the Proposed Grid Connection Infrastructure for the Damlaagte Solar PV Facility



4. DESCRIPTION OF THE AFFECTED ENVIRONMENT

4.1. Climate

The study area is associated with summer rainfall, and a cool – temperate climate. Average monthly temperatures are lowest in July (9.46°C) and highest in January (22.07°C). Average monthly rainfall is lowest in July (4.19 mm) and highest in January (116.9 m) (see Figure 7 1). The area is associated with high extremes between maximum summer and minimum winter temperatures, and frequent occurrence of frost.

4.2. Topography and Geology

The study area is located approximately $1\,440-1\,490\,m$ above sea level. The area is primarily associated with sedimentary rocks, i.e., shale, sandstone, and mudstone, etc, and belong to the Madzringwe Formation of the Karoo Supergroup. The Karoo Suite dolerites which are a common geological feature in the area are also present. Rocks from the Volksrust Formation of the Karoo Supergroup are located to the south of the study area, and older lithologies of the Witwatersrand, Transvaal and Ventersdorp supergroups are located to the west of the study area towards Parys.

4.3. Soils and Land Potential

The study area predominantly consists of the Ba39 and Bb23 Land Types. Land Type Ba39 consists of five terrain units while Land Type Ba23 consists of four terrain units. In terms of the Department of Agriculture, Land Reform and Rural Development (then Department of Agriculture, Forestry and Fisheries) land capability data, a significant portion of the project site for the proposed project consists of land with a Low – Moderate (Class 07) land capability.

Following the soil classification and analysis, it was concluded that the site has moderate and high agricultural potential for the rainfed production of grain crops. Two areas have Moderate agricultural potential (a section that runs through the middle of the site as well as along the western boundary) and the areas combinedly measure 76.1 ha. Land with low agricultural potential is present in all the remaining areas and measure 106.7 ha.

4.4. Biodiversity

4.4.1. Flora

The findings of the Terrestrial Biodiversity Impact Assessment indicate that the project site is associated mainly with three (3) habitat units within the Soweto Highveld Grassland Vegetation Type. These habitats units include the transformed and grassland habitats. The grassland habitat is further sub-divided into three (3) habitat subunits, which include the Degraded Grassland, *Seriphium* – dominated Grassland and *Themeda* – rich Grassland subunits. The various types of habitat units and subunits present within the project site are differentiated on the basis of plant species composition.

The project site is not associated with any nationally – listed (in terms of NEMBA) or Red Data – listed plant species. Localised listed and Protected plant species present within the project site are listed in terms of the Free State Nature Conservation Ordinance Act, 1969 (Act 8 of 1969) and the identified species include, *Aloe davyana*, *Crinum bulbispermum*, *Helichrysum chionosphaerum*, *Helichrysum actuatum* and *Boophane disticha*.



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4.4.2. Fauna

Spoors of a Black – backed Jackal, Porcupine, and evidence of burrowing activity of an Aardvark as well as a spoor of a Warthog (mainly on farm roads) were identified within the study area. The Aardvark was the only fauna species of conservation concern identified during the field-based survey in the area. The current land use of the study area, i.e., grazing; constant human presence and disturbance; homogenous nature of the landscape and limited cover provided reduce the suitability of this area as a habitat for most mammal listed and protected species.

A total of 194 avifauna species could potentially occur within the broader study area, and 62 of these species are classified as priority species. Within the 62 species, only 31 have a medium probability of being present within the study area. 19 species were recorded during the field-based site survey.

4.4.3. Freshwater Features

There are no freshwater features present within the project site of the proposed project, however, an unchanneled valley bottom wetland is located 49 m from the western boundary of the project site.

4.5. Socio-economic profile

The proposed project falls within the Fezile Dabi District Municipality (FDDM) in the Free State Province and falls within Ward 7 of the Ngwathe Local Municipality (NLM).

According to the Community Survey 2016, the number of households in the study area has increased on all levels. The average household size has shown a decrease on all levels, which means there are more households, but with less members. The intensity of poverty has increased slightly in all areas, except the Fezile Dabi District and the Metsimaholo LM where it decreased slightly. Ward 7 has the largest proportion of discouraged work seekers, indicating a shortage of employment opportunities in the area. More than 45% of the households on district, local and ward level had an annual household income of below R19 601 in 2011, except in the Metsimaholo LM and Ward 14, where the proportion is lower.

The Fezile Dabi DM is associated with an expansive road network. Some of the busiest routes within the Fezile Dabi DM and the NLM include the N1 national road and the R59 provincial road. The N1 links Polokwane, Pretoria, Johannesburg, Bloemfontein, and Cape Town. The routes are utilised for the movement of freight and by tourists. Existing roads within the vicinity of the proposed project, that will be used to provide access to the project site of the proposed project include the Boundary Road and the Road S 171.

4.6. Visual Profile

The landscape of the study area and the surrounding environment (within a 10 km radius of the study area) is characterised mostly by rolling agricultural land, with low hills occurring in the western and southern western parts. The Vaal River located at least 400 m to the northern boundary of the study area is the dominant landscape feature in the area. The only naturally occurring landscape type within the study area is the hills. The general land character and overall visual impression of the study area is open land, punctuated bosques of tall trees (mostly exotic) associated with farmsteads. The land slopes gently to the Vaal River system, where a concentration of tall tree is evident.

Agriculture is by far the dominant land use within the surrounding area, with approximately 90 % of the study area utilized for grazing and cultivated lands. Residential land use within the surrounding area is mostly



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associated with either recreation-type activities along the Vaal River, or homesteads and scattered Agricultural Holdings. A small resort community, Vaal Oewer, is in the far north - western section of the study area immediately north of the Vaal River on a promontory of land, which affords panoramic views over the north - west. The area is well known for its tourism, primarily associated with the Vaal River.

4.7. Heritage and Palaeontology Resources

The study area is associated with an archaeological record of Early and Middle Stone Age artefacts and rock engravings which have been recorded from previous studies within the surrounding environment. The archaeological record within the vicinity of the study area from the Iron Age includes Type N and Type V walling located to the south-east of the study area near Heilbron. Based on the outcomes of the Heritage Impact Assessment, the project site for the proposed project contains little to no heritage resources.

The study area is associated with rocks of the Karoo Supergroup – well known for being a host of fossils as well as coal deposits. According to the SAHRIS Palaeosensitivity Map, the study area is associated with a low to moderate sensitivity. Given that there are no paleochannels or rivers present within the study area and there is a well-documented history within the surrounding area of historical mining activities, the possibility of locating fossils within the study area is low.

5. IMPACT ASSESSMENT CONCLUSIONS

5.1. Summary of potential impacts

A summary of the potential impacts associated with the proposed project is provided in the following sections and in Table 2 below.

5.1.1. Construction and Decommissioning Phases

The majority of the impacts associated with the construction and decommissioning phases would be very localised (i.e., occurring on site only) and of short-term duration (i.e., reversible). The majority of the impacts associated with these two phases, are considered to be **INSIGNIFICANT** or of **VERY LOW to LOW** significance with mitigation. The most significant construction phase impact is related to the creation of employment for the duration of the construction period and business opportunities particularly in the local service industry, which is considered to be of **HIGH (POSITIVE)** significance with mitigation. However, the potential impacts on soils and associated loss of agricultural potential are deemed to be of **MEDIUM** significance.

5.1.2. Operational Phase

The assessment is based on an indicative layout as presented in Figure 5-1. In general, the impacts associated with the operation phase are long-term, as the Power Purchase Agreement associated with the Solar PV facility is valid for a period of 20 years, after which the Agreement can be renewed or the power plant, and thus the associated grid transmission line are decommissioned. The key negative impact related to the operation phase is the potential impact on avifauna. Collisions with overhead transmission lines are the biggest threat to birds during the operational phase. The species susceptible to collisions with the transmission line on site include waterbirds, terrestrial species, and raptors. As this risk would remain throughout the duration of the operational phase, it is considered to be of **MEDIUM** significance with mitigation; and



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The remaining negative impacts are generally considered to be of **VERY LOW to LOW** significance with mitigation. The significance ratings are associated, to a large extent, with the following:

- The small disturbance footprint and short length associated with the proposed project; and
- There are no unique or important faunal habitats found on site relative to the surrounding area.

5.1.3. Cumulative Impact

As noted in Section 1, the proposed project forms part of the overall proposed Scafell Cluster project which comprises four (4) solar PV facilities and associated grid connections. A separate Environmental Assessment process has been conducted for each of these proposed projects. These photovoltaic power projects proposed by Mainstream, together with any other proposed and existing projects and activities in the area would have a cumulative impact on the biophysical and socio-economic environment. The cumulative impacts are summarised below.

The cumulative impact on fauna, freshwater and heritage and palaeontology are considered to be **LOW** significance with mitigation. All cumulative impacts on terrestrial flora are considered to be of **LOW** to **MEDIUM** significance.

The key cumulative socio-economic impacts include:

- The visual impact associated with the projects on the areas sense of place and landscape character is considered to be of MEDIUM to HIGH significance;
- The cumulative impact associated with the creation of local employment and business opportunities is considered to be **MEDIUM** (*POSITIVE*) significance, it would go a long way to offsetting the negative socioeconomic impacts; and
- The increase in construction activities in the area could potentially exacerbate ongoing safety and security
 issues currently being experienced in the area. This is deemed to be a MEDIUM significant impact on
 existing social networks and community structures.

Table 2: Summary of the significance of potential impacts associated with the proposed project

Environmental	Potential Impacts	CONSTRUCT	TION PHASE OPERATIONAL		NAL PHASE	AL PHASE DECOMMISSIONING PHASE	
component		Without mitigation	With mitigation	Without mitigation	With mitigation	Without mitigation	With mitigation
Ecological Impacts	Impacts on Vegetation	Medium	LOW	Low	LOW	Medium	LOW
	Impact on Terrestrial Fauna	Very Low	VERY LOW	Very Low	VERY LOW	Very Low	VERY LOW
	Impacts on avifauna	Low	LOW	High	MEDIUM	Low	LOW
	Impacts on freshwater resources	Low	LOW	Low	LOW	Low	LOW
Biophysical Impacts	Nuisance impacts (air quality and noise)	Low	Insignificant	-	-	Low	Insignificant



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Environmental	Potential Impacts	CONSTRUCT	TON PHASE	OPERATIONAL PHASE		DECOMMISSIONING PHASE	
component		Without mitigation	With mitigation	Without mitigation	With mitigation	Without mitigation	With mitigation
	Impacts on soils and associated agricultural potential	High	MEDIUM	Medium	VERY LOW	High	MEDIUM
Socio- economic Impacts	Impacts on the Heritage and Cultural Environment	Very Low	Insignificant	-	-	-	-
	Impact on Palaeontological Resources	Very Low	Insignificant	-	-	-	-
	Visual Impact	Low	LOW	Medium	LOW	Very Low	VERY LOW
	Creation of employment and business opportunities	High (positive)	HIGH (positive)	-	-	-	-
	Impact on safety and security on neighbouring residents	Medium	Low	-	-	-	-
	Impact on traffic	Low	VERY LOW	Low	VERY LOW	-	-
No-Go Alternati	ve		LOW to MEDIUM				

5.2. Mitigation measures

A key component of the BA process included exploring practical ways of avoiding or reducing potentially significant impacts of the proposed project. These are commonly referred to as mitigation measures, which are aimed at preventing, minimising, or managing significant negative impacts to as low as reasonably practicable, and optimising and maximising any potential benefits of the proposed project. Mitigation measures have been, where relevant, incorporated into the Generic Substation and Transmission Line EMPrs (included as Appendices 7.1 and 7.2 of this BAR).

5.3. Comparative assessment of project alternatives

5.3.1. Layout and Design Alternatives

The assessment is based on an indicative development layout and considers the possibility that the position of some structures within the general development footprint area may be adjusted slightly. Due to the relatively short length of each transmission line alternative and the fact that they are located in relatively close proximity to one another, the overall impact assessment significance for each alternative was deemed to be the same. Thus, Alternative 1 is considered as to be the most technically feasible grid connection corridor for development. Refer to Table 3 for the technical details of the preferred grid connection corridor.



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Table 3: Technical Details of The Preferred Grid Connection Corridor

Component		Damlaagte Grid Connection
Property details:	Corridor Alternative 1 (Preferred)	Damlaagte 229 Remaining Extent Willow Grange 246 Portion 3 Scafell 448 Remaining Extent
Grid Connecti	on Corridor Dimensions	Corridor Alternative 1 (Preferred)
Grid Connecti	on Corridor Width:	150 m wide (and up to 500 m around the switching station footprint)
Grid Connecti	on Corridor Length:	2 km
Servitude wid	th:	Up to 31 m
Grid Connecti	on Corridor Coordinates	Alternative 1 (Preferred)
	01	26°47'57.10"S 27°37'35.06"E
	02	26°48'14.38"S 27°38'16.36"E
	03	26°48'33.89"S 27°38'13.50"E
	04	26°48'36.83"S 27°38'25.18"E
	05	26°48'44.88"S 27°38'29.42"E
	06	26°48'55.14"S 27°38'11.01"E
	07	26°48'43.36"S 27°38'2.63"E
Switching Stat	tion Coordinates	26°48'1.16"S 27°37'40.55"E
Switching Stat	tion capacity:	33 / 132 kV
Switching Stat	tion footprint:	Up to 2.5 ha
Transmission	Line capacity:	Up to 132 kV
Transmission	Line length:	Up to 2 km
Transmission	Line pylons:	Monopole or Lattice pylons, or a combination of both where required
Power Line py	lon height:	Up to 30 m
Access to tran	smission line servitude:	A 12 m wide and 5 km long jeep track will be required and constructed during the construction phase of the proposed project. Existing roads and jeep tracks within existing servitudes in the study area will be used as far as possible to gain access to the grid connection corridor during the construction and operation phase of the proposed project.



5.3.2. No-Go Alternative

The No-Go alternative represents the option of not to proceed with the proposed project, which leaves the project area of influence in its current state, except for variation by natural causes and other human activities. It, thus, represents the current status quo and the baseline against which all potential project-related impacts are assessed. The No-Go alternative would also forego the potential cumulative negative impacts and possible advantages of the proposed project, e.g., creation of employment opportunities.

The most significant of the no-go impacts identified, was the likelihood that the proliferation of *Seriphium plumosum* would continue unabated in certain habitats on site. This species has been identified as a problematic encroacher species within the Grassland Biome (Mucina and Rutherford 2006). Thus, it is possible that without any intervention this species would continue to dominate and ultimately reduce the overall habitat for other indigenous species and result in the gradual degradation of CBA and ESA areas. Given the uncertainty, this is deemed to be **LOW** to **MEDIUM** significant impact.

5.4. RECOMMENDATION / OPINION OF ENVIRONMENTAL ASSESSMENT PRACTITIONER

The key principles of sustainability, including ecological integrity, equity and social justice, and economic efficiency, are integrated below as part of the supporting rationale for recommending an opinion on whether the proposed project should be approved.

5.4.1. Ecological integrity

The use of renewable energy (e.g., solar and wind) is considered to have significant ecological benefits and is a key component in the transition from the economy's dependence on fossil fuels. The proposed project is intended to support a proposed solar PV facility, which would help to offset the total carbon emissions associated with energy generation in South Africa. Reduced carbon emissions through the use of renewable energy would have benefits in terms of global warming and climate change. In terms of site location, the proposed project is located in an area that has suitably high solar radiation intensities and is thus considered to be an efficient use of available resources.

The proposed project would result in the clearing of an estimated 3 ha of existing vegetation, however, in terms of positioning on site, the mapped CBA areas on site can be generally avoided. Although the localised impact on the vegetation is one of the more significant biophysical impacts, it is deemed to be largely reversible at the end of the project when the transmission line is decommissioned, and the site rehabilitated.

The proposed transmission line would add to the potential risk of bird strikes However, this impact is not considered to be a "new" impact in the area, due to the numerous existing power lines linking to the Scafell substation. Furthermore, the proposed mitigation measures would reduce the likelihood of this impact occurring.

In summary, the proposed project would result in the loss of some ecological integrity in the study area, but it is considered to be small and localised.

5.4.2. Equity and social justice

With respect to potential impacts on the existing agricultural activities on site, the landowner will enter into an applicable lease agreement with the proponent and as such the loss of grazing would likely be offset by the income the farmer would receive from the lease agreement. From the agricultural assessment it is noted



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that crop production on the property had been stopped in 2006 and the property has been used for extensive livestock farming. Once crop production was abandoned, the fields were left fallow and pioneer species established themselves.

The proposed project would create a number of local employment and business opportunities. It is anticipated that a large number of the low and medium skilled employment opportunities could be sourced from the local labour force in and around the site with the implementation of a skills development and training programme during the construction phase. In terms of business opportunities for local companies, procurement would create business opportunities for the regional and local economy. A percentage of the monthly wage bill earned by employees would be spent in the regional and local economy, which would result in indirect benefits to local businesses in the nearby towns of Parys and Sasolburg.

The proposed project would alter the local visual landscape / rural character of the site, which would have a visual impact in the immediate surrounding area and especially along the N1 national road. This impact is mitigated to a certain extent by the existing visual clutter in the rural landscape, which has increased the visual absorption capacity for the proposed project.

Thus, in terms of the issue of equity and social justice, the proposed project is considered to result in the equitable distribution of positive and negative impacts with no one group or community being adversely affected.

5.4.3. Economic efficiency

South Africa is facing a rising demand for power and is looking for other energy sources, including renewable energy, to decrease its dependence on the coal-fired power that provides most of the country's electricity. As such, renewable energy technologies are playing a key role in meeting South Africa's energy needs into the future. The proposed project is intended to support the establishment of a solar PV facility and thus furthers this goal.

The proposed project is considered ideally located in order to link into the national grid, due to its close proximity to the existing ESKOM Scafell MTS.

From the above sustainability criteria, the nature and extent of the proposed development, compliance with the relevant legal, policy and planning documentation (i.e., "need and desirability") and the findings of the specialist studies, it is the opinion of SLR that the proposed project can be supported from an environmental perspective and should be considered for Environmental Authorisation, subject to the implementation of the identified recommendations.



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ACRONYMS AND ABBREVIATIONS

Acronym / Abbreviation	Definition
ВА	Basic Assessment
BAR	Basic Assessment Report
BBBEE	Broad-Based Black Economic Empowerment
B.Sc.	Bachelor of Science
CA	Competent Authority
CARA	Conservation of Agricultural Resources Act, 1983 (No. 43 of 1983)
СВА	Critical Biodiversity Area
CBD	Central Business District
COD	Chemical Oxygen Demand
CR	Critically Endangered
DFFE	Department of Forestry, Fisheries and Environment (formerly Department of Environmental Affairs (DEA))
DWS	Department of Water and Sanitation (formerly Department of Water Affairs (DWA))
DM	District Municipality
DMRE	Department of Mineral Resources and Energy (formerly Department of Mineral Resources (DMR))
EA	Environmental Authorisation, i.t.o. NEMA
EAP	Environmental Assessment Practitioner
EAPASA	Environmental Assessment Practitioners Association of South Africa
EC	Electrical Conductivity
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EIA Regulations, 2014	Environmental Impact Assessment Regulations, 2014 (GN R 982 of 2014, as amended by GN R 326 of 2017)
EIAR	Environmental Impact Assessment Report
EIS	Ecological Importance and Sensitivity
EMPr	Environmental Management Programme
En	Endangered
ESA	Ecological Support Areas
FEPA	Freshwater Ecosystem Priority Area
GA	General Authorisation
GDP	Gross Domestic Product
GHG	Greenhouse Gas
GN	Government Notice



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Acronym / Abbreviation	Definition
HIA	Heritage Impact Assessment
I&AP	Interested and Affected Party
IDP	Integrated Development Plan
IFC	International Finance Corporation
IRP	Integrated Resource Plan
ISO	International Standards Organization
IUCN	International Union for Conservation of Nature
LC	Least Concern
LN	Listing Notice
LN 1, 2014	Environmental Impact Assessment Regulations Listing Notice 1, 2014 (GN R 983 of 2014, as amended by GN R 327 of 2017)
LN 2, 2014	Environmental Impact Assessment Regulations Listing Notice 2, 2014 (GN R 984 of 2014, as amended by GN R 325 of 2017)
LN 3, 2014	Environmental Impact Assessment Regulations Listing Notice 3, 2014 (GN R 985 of 2014, as amended by GN R 324 of 2017)
LoS	Level-of-Service
mamsl	Metres Above Mean Sea Level
MAP	Mean Annual Precipitation
MAR	Mean Annual Runoff
MEC	Member of the Executive Council
M.Sc.	Master of Science
NAAQS	National Ambient Air Quality Standard
NAEIS	National Atmospheric Emission Inventory System
NDCR	National Dust Control Regulations, 2013
NDP	National Development Plan
NEMA	National Environmental Management Act, 1998 (No. 107 of 1998)
NEM: AQA	National Environmental Management: Air Quality Act, 2004 (No. 57 of 2003)
NEM:BA	National Environmental Management: Biodiversity Act, 2004 (No. 10 of 2004)
NEM: PAA	National Environmental Management: Protected Areas Act, 2003 (No. 57 of 2003)
NEM: WA	National Environmental Management: Waste Act, 2008 (No. 59 of 2008)
NFEPA	National Freshwater Ecosystem Priority Areas, 2011
NHRA	National Heritage Resources Act, 1999 (No. 25 of 1999)
NPAES	National Protected Areas Expansion Strategy
NT	Near Threatened
NWA	National Water Act, 1998 (No. 36 of 1989)



Acronym / Abbreviation	Definition
PES	Present Ecological State
PM	Particulate Matter
Pr.Sci.Nat.	Registered Professional Natural Scientists
R	Regulation
RE	Remaining Extent
SAAQIS	South African Air Quality Information System
SAAELIP	South African Atmospheric Emission Licensing and Inventory Portal
SAHRA	South African Heritage Resources Agency
SAHRIS	South African Heritage Resource Information System
SANBI	South African National Biodiversity Institute
SANS	South African National Standards
SAWS	South African Weather Services
scc	Species of Conservation Concern
SDF	Spatial Development Framework
SHE	Safety, Health and Environment
SIA	Social Impact Assessment
SLR	SLR Consulting (South Africa) (Pty) Ltd
SPLUMA	Spatial Planning and Land Use Management Act, 2013 (No. 16 of 2013)
S&EIA	Scoping and Environmental Impact Assessment
TIA	Traffic Impact Assessment
VAT	Value Added Tax
VIA	Visual Impact Assessment
Vu	Vulnerable
WHO	World Health Organization
WML	Waste Management Licence, i.t.o. NEM: WA
WUL	Water Use Licence, i.t.o. NWA
WULA	Water Use Licence Application



Proposed Grid Connection Infrastructure, Damlaagte Solar PV Facility: Draft Basic Assessment Report, Free State Province

1. INTRODUCTION

1.1 PROJECT BACKGROUND

South Africa Mainstream Renewable Power Developments (Pty) Ltd (Mainstream) is proposing to develop, construct and operate four Solar Photovoltaic (PV) facilities³ and associated grid connection infrastructure on a site located 19 km west of the town Sasolburg in the Free State Province (Figure 1-1). The four Solar PV facilities and associated grid connections are collectively referred to as the Scafell Cluster.

The associated grid connections for each facility of the Scafell Cluster are subject to separate Applications for Environmental Authorisation. A Basic Assessment (BA) process must be undertaken for each application. The grid connection considered in this Basic Assessment Report (BAR) is to facilitate the connection between the proposed 150 MW_{ac} Damlaagte Solar PV Facility⁴ and the existing ESKOM Scafell Main Transmission Substation (MTS). Thus, this BAR is compiled for **the Damlaagte Solar PV Facility Grid Connection**.

It is proposed that the Damlaagte Solar PV Facility Grid Connection would have a contracting capacity of up 132 kV and include a double circuit Transmission Line and a 33 / 132 kV Switching Station. Two grid connection corridors are being considered and assessed in this BAR to connect the proposed Damlaagte Solar PV facility to the national grid (see Figure 1-2):

- Grid Routing Alternative 1 (Preferred): This corridor is 150 m wide and is approximately 2.0 km in length. The proposed grid connection is from the on-site substation (Switching Station) of the proposed Damlaagte Solar Facility located on Damlaagte RE/229 and extends for about 1 km in an easterly direction across Willow Grange 3/246 to before turning about 90° south for 0.6km across Scafell RE/448, then turning slightly southeast for 0.3 km before terminating at the ESKOM Scafell MTS. This is the shortest most direct route to connect to the ESKOM Scafell MTS.
- **Grid Routing Alternative 2**: This corridor is 150 m wide and is also approximately 2.5 km in length. This proposed grid connection starts at the on-site substation (Switching Station) of the proposed Damlaagte Solar Facility located on Damlaagte RE/229 and extends for about 0.6 km in an easterly direction across Willow Grange 3/246, then turns about 90° southwest for 0.7 km and then southeast for 0.9 km onto Procedeerfontein 5/100, and then turns northeast for 0.2 km before terminating at the ESKOM Scafell MTS located on Scafell RE/448.

Details of the affected properties for the proposed grid connections for the Scafell Cluster is summarised in Table 1-1 below.

⁴ The Application for EA process for the Damlaagte Solar PV Facility is being undertaken separately (DFFE Reference: 14/12/16/3/3/2/2078).



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 $^{^{3}}$ The solar PV facilities are being assessed in a separate Environmental Impact Assessment (EIA) process.

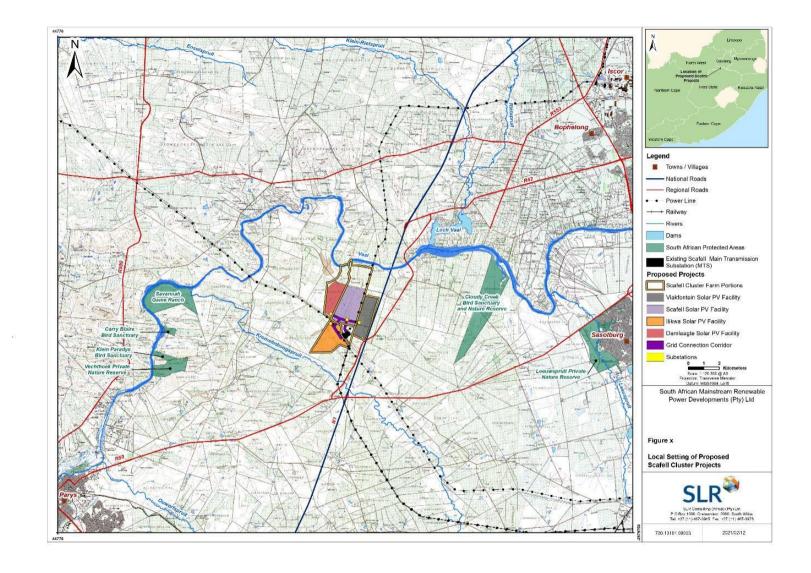


Figure 1-1: A Regional Map illustrating the location of the proposed Scafell Cluster Project and the associated grid connections



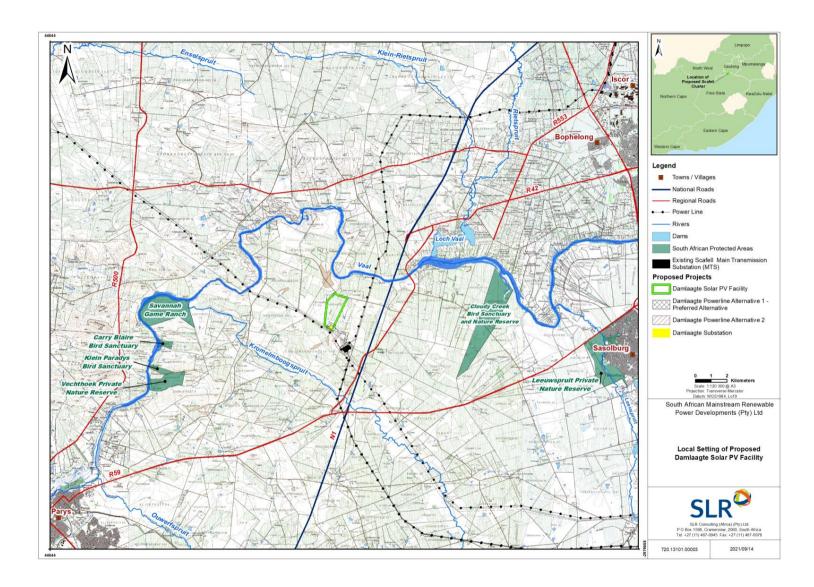


Figure 1-2: Location of the proposed grid connection infrastructure for the Damlaagte Solar PV Facility in relation to the surrounding area



Table 1-1: Details of Each of The Grid Connection Projects Associated with The Scafell Cluster

Project Name	Capacity (kV)	Affected Properties
Damlaagte Solar PV Facility Grid Connection	132 kV	 Remaining Extent of the Farm Damlaagte 229 (RE/229) Portion 3 of the Farm Willow Grange 246 (3/246) Remaining Extent of the Farm Scafell 448 (RE /448) Portion 5 of the Farm Proceederfontein 100 (5/100)
Scafell Solar PV Facility Grid Connection	132 kV	 Portion 3 of the Farm Willow Grange 246 (3/246) Remaining Extent of the Farm Scafell 448 (RE/448) Portion 5 of the Farm Proceederfontein 100 (5/100)
Vlakfontein Solar PV Facility Grid Connection	132 kV	 Portion 6 of the Farm Vlakfontein 161 (6/161) Portion 3 of the Farm Willow Grange 246 (3/246) Remaining Extent of the Farm Scafell 448 (RE/448)
Ilikwa Solar PV Facility Grid Connection	132 kV	 Portion 5 of the Farm Proceederfontein 100 (5/100) Portion 3 of the Farm Willow Grange 246 (3/246) Remaining Extent of the Farm Scafell 448 (RE/448)

Taking the above into consideration, Mainstream has appointed SLR Consulting (South Africa) Pty Ltd as the Independent Environmental Assessment Practitioner (EAP) to undertake the required BA process for the proposed grid connection projects for the Scafell Cluster Project.

1.2 PURPOSE OF THIS REPORT

This BAR presents the process followed and the findings of the BA process undertaken for the Damlaagte Solar PV Facility Grid Connection. The report has been compiled in accordance with Appendix 1 (Basic Assessment Report) of the EIA Regulations 2014 (as amended) and is now being distributed for review and comment as part of the BA process in accordance with the requirements of the National Environmental Management Act, 1998 (No. 107 of 1998) (NEMA) (as amended) and Regulations thereto.

This Draft BAR outlines the process followed as part of this application and presents the findings of the BA process undertaken for the proposed Solar PV Facility. The BAR has been compiled in accordance with Appendix 1 of the 2014 EIA Regulations (as amended) and is now being distributed for review and comment as part of the EIA process.

This Draft BAR is being made available for a 30-day review and comment period, from **23 September** to **25 October 2021**, in order to provide Interested and Affected Parties (I&APs) with an opportunity to comment on any aspect of the proposed project as well as the findings of the BA process to date. A copy of the Draft BAR (including appendices) has been made available on:

- the SLR website at http://slrconsulting.com/public-documents/mainstream-scafell;
- the corresponding data-free website, where the report can also be downloaded without any data charges using internet-capable mobile phones, at https://www.slrpublicdocs.datafree.co/public-documents/mainstream-scafell.

A hard copy of the report and appendices have also been placed at the following public locations / venues:



Name of Location	Contact Details
Sasolburg City Library	John Vorster Avenue, Sasolburg Tel: 016 973 8464 Fax: 016 976 3083 Email: sasolburg@sacr.fs.gov.za
Zamdela Public Library	3246 Taylor Park, Zamdela Tel: 016 974 2163 Fax: 016 976 0308 Email: zamdela@fslib.gov.za

Comments should be forwarded to the SLR at the address, telephone or email address shown below⁵. For comments to be included in the final BAR, comments should reach SLR no later than **25 October 2021.**

SLR Consulting (South Africa) (Pty) Ltd

Attention: Candice Sadan 720.13101.00003@slrconsulting.com

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1.3 STRUCTURE OF THE BASIC ASSESSMENT REPORT

This BAR has been prepared in compliance with Appendix 1 of the EIA Regulations 2014 (as amended) and is divided into various chapters and appendices, the contents of which are outlined below.

Section	Contents				
Executive Summary	Provides a comprehensive synopsis of the BAR				
Chapter 1	Introduction Provides a background of the project; describes the purpose of the BAR; provides information to I&APs on the opportunity to provide comments on the BAR and outlines the structure of the report.				
Chapter 2	Legislative requirements Outlines the key legislative requirements applicable to the proposed project.				
Chapter 3	BA Process Approach and Process Outlines the approach and process for the assessment and consultation process undertaken for the BA process. It also includes a summary of the public participation process undertaken to date and the results thereof.				
Chapter 4	Need and Desirability Provides an overview of the need and desirability for the proposed project.				
Chapter 5	Project Description Provides general project information and presents a description of the proposed project.				
Chapter 6	Alternatives Provides an overview of the alternatives considered for the proposed project.				
Chapter 7	Description of the affected environment Describes the existing biophysical and social environment that could potentially be affected by the proposed project.				
Chapter 8	Impact Assessment Describes key issues and impacts associated with the proposed project.				
Chapter 9	Cumulative Impact Assessment Describes key cumulative issues and impacts associated with the proposed project.				
Chapter 10	Conclusion Compares the environmental impacts and risks of the project alternatives.				
Chapter 11	References Provides a list of the references used in compiling this report.				
	Appendix 1: EAP Declaration & Undertaking Appendix 2: Curricula Vitae (including registrations) of the Project Team Appendix 3: Public Participation Process				
	Appendix 8.3: Avifauna Compliance Statement Appendix 8.4: Soils, Agriculture Potential and Land Capability Impact Assessment				



Section	Contents			
		Appendix 8.5: Heritage Impact Assessment		
		Appendix 8.6: Desktop Palaeontological Impact Assessment		
		Appendix 8.6: Visual Impact Assessment		
		Appendix 8.9: Traffic Impact Assessment		
		Appendix 8.10: Social Impact Assessment		
	Appendix 9:	Specialist Declaration of Interest		
	Appendix 10:	Appendix 10:Additional Information		



2. ADMINISTRATIVE AND LEGAL FRAMEWORK

2.1 NATIONAL ENVIRONMENTAL MANAGEMENT ACT 107 OF 1998

The National Environmental Management Act (NEMA), as amended, establishes principles, and provides a regulatory framework for decision-making on matters affecting the environment. Section 2 of NEMA sets out a range of environmental principles that are to be applied by all organs of state when taking decisions that significantly affect the environment. Included amongst the key principles is that all development must be socially, economically, and environmentally sustainable and that environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural, and social interests equitably. The participation of I&APs is stipulated, as is that decisions must consider the interests, needs and values of all Interested and Affected Parties (I&APs).

Chapter 5 of NEMA provides a framework for the integration of environmental issues into the planning, design, decision-making and implementation of plans and development proposals. Section 24 provides a framework for granting of environmental authorisations. To give effect to the general objectives of Integrated Environmental Management (IEM), the potential impacts on the environment of listed or specified activities must be considered, investigated, assessed, and reported on to the competent authority. Section 24(4) provides the minimum requirements for procedures for the investigation, assessment, management, and communication of the potential impacts.

2.2 NEMA EIA REGULATIONS 2014

The EIA Regulations 2014 (as amended) promulgated in terms of Chapter 5 of NEMA and published in Government Notice (GN) R982 (as amended by GN No. 326 of 7 April 2017) control certain listed activities. These activities are listed in GN R983 (Listing Notice 1; as amended by GN R327 of 7 April 2017), R984 (Listing Notice 2; as amended by GN R325 of 7 April 2017) and R985 (Listing Notice 3; as amended by GN R324 of 7 April 2017) and are prohibited until an Environmental Authorisation (EA) has been obtained from the Competent Authority. Such an EA, which may be granted subject to conditions, will only be considered once there has been compliance with GN R982 (as amended).

GN R982 (as amended) sets out the procedures and documentation that need to be complied with when applying for an EA. A BA process must be applied to an application if the authorisation applied for is in respect of an activity or activities listed in Listing Notices 1 and/or 3 and a Scoping and EIA process must be applied to an application if the authorisation applied for is in respect of an activity or activities listed in Listing Notice 2.

As the Damlaagte Solar PV Facility Grid Connection includes activities listed in Listing Notices 1 and 3 (see Table 2-1), it is necessary that a BA process is undertaken in order for the Department of Forestry, Fisheries, and the Environment (DFFE) to consider the application in terms of NEMA. The DFFE has been identified as the Competent Authority for the proposed project in accordance with GN R779 of 1 July 2016 as it is mandated with the issuance of EAs for all projects related to the Integrated Resources Plan (IRP) 2010 – 2030, and any updates thereto. The DFFE will be supported by the Free State Provincial Department of Small Business Development, Tourism and Environmental Affairs (DESTEA) as the commenting authority.



NEMA Listed Activities applied for as part of the proposed project Table 2-1:

No.	Activity description	Description of activity in relation to the proposed project
GN R983 (Listin	ng Notice 1)	
11(i)	The development of facilities or infrastructure for the transmission and distribution of electricity outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kV.	The proposed project will require the construction and operation of a 33 / 132 kV switching station and an overhead double circuit Transmission Line of up to 132 kV. This infrastructure will facilitate the connection between the proposed 150 MW _{ac} Damlaagte Solar PV Facility and the ESKOM Scafell MTS.
19	The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles, or rock of more than 10 cubic metres from a watercourse; but excluding where such infilling, depositing, dredging, excavation, removal or moving - a) will occur behind a development setback; b) is for maintenance purposes undertaken in accordance with a maintenance management plan; c) falls within the ambit of activity 21 in this Notice, in which case that activity applies; d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies	Internal access roads and electrical cabling required to connect the various PV facility infrastructure and components will collectively require the excavation, infilling or removal of soil exceeding 10 m³ (exact values to be determined following layout finalisation).
24(ii)	The development of a road where the road is wider than 8 metres	The development of the 33 / 132 kV switching station will require the clearance of indigenous vegetation in excess of 1 ha.
27	The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for — (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan	The development of the 33 / 132 kV switching station will require the clearance of an area in excess of 1 ha.
28(ii)	Residential, mixed, retail, commercial, industrial, or institutional developments where such land was used for agriculture, game farming, equestrian purposes, or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or	The proposed project will be established on land previously used for agricultural on or after 01 April 1998. The total footprint of the switching station for the proposed project is in excess of 1 ha.



No.	Activity description	Description of activity in relation to the proposed project
	(ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare;	
GN R985 (Listin	ng Notice 3)	
4(b)(i)(ee)	The development of a road wider than 4 metres within a reserve of less than 13.5 metres within (b) the Free State Province, (i) outside urban areas, and (ee) within critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans.	The proposed project will require the construction of a road with a width of up to 12 m. The project site is located within a CBA 2 area identified in terms of the Free State Biodiversity Plan (2015).
12(b)(ii)	The clearance of area of 300 square metres or more of indigenous vegetation where such clearance of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.	The proposed project will require the clearance of an area with indigenous vegetation in excess of 300 m ² for the placement of foundations for pylons for the overhead transmission line. Thus, this section of the grid connection corridor to be cleared falls within a CBA 2 in the Free State Province, identified in terms of the Free State Biodiversity Plan (2015).
14(ii)(d)(b)(ff)	The development of - (i) dams or weirs, where the dam or weir, including infrastructure and water surface area exceeds 10 square metres; or (ii) infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs - a) within a watercourse; b) in front of a development setback; or c) if no development setback has been adopted, d) within 32 metres of a watercourse, measured from the edge of a watercourse; excluding the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour	The proposed project may require the placement of infrastructure of 10 m² or more, within 32 m of a watercourse within a CBA 2 area in the Free State Province, identified in terms of the Free State Biodiversity Plan (2015).
18(b)(i)(ee)	The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre.	The proposed project will require the widening of existing roads to a width of up to 12 m during the construction phase. It may be that the upgrades to the roads will be undertaken within existing roads that fall within CBA 2 area as identified by the Free State Biodiversity Plan (2015).

2.3 NATIONAL WATER ACT 36 OF 1998

Chapter 4 of the National Water Act No 36 of 1998 (as amended), requires proponents to proposed developments to submit applications to the competent authority (Regional Office of the Department of Water and Sanitation (DWS)) where a water use listed under Section 21 of the Act is triggered. Water Use is defined by broadly by the Act and includes, taking and storing water, activities which reduce stream flow, waste discharges and disposals, controlled activities (activities which impact detrimentally on a water resource), alteration of a watercourse, removing water underground for certain purposes and recreation. Possible water uses that could triggered by the proposed project are outlined in Table 2-2. An application



for a Water Use License (WUL) or General Authorisation (GA) must be undertaken in accordance with the regulations of GN R267 of 2017 prior to the construction phase of the proposed project.

Table 2-2: List of potential Section 21 water uses applicable to the proposed project

No.	Water Use	Description of activity in relation to the proposed project
а	Taking water from a water resource	The proposed project may require the abstraction of water for the construction and operation phase of the proposed project.
i	Impeding or diverting the flow of water in a watercourse Altering the bed, banks, course, or characteristics of a watercourse	The two alternative grid connection corridors assessed in this BAR fall within the Zone of Regulation (i.e., 500 m radius) of an unchanneled valley bottom wetland system and a depression wetland. As a result, is it possible that the construction and operation of the grid connection infrastructure may potentially lead to an impediment or alteration of beds, banks, course of the freshwater resources present within the study area. Mainstream as the proponent will be required to submit an application for a Water Use License (WUL) or General Authorisation (GA) Registration to the Regional Head of the Department of Human Settlements, Water and Sanitation (DHSWS) in the Free State Province prior to the construction phase of the proposed project.

2.4 NATIONAL HERITAGE RESOURCES ACT 25 OF 1999

The National Heritage Resources Act, 1999 (No. 25 of 1999) (NHRA) provides for the identification, assessment, and management of the heritage resources of South Africa. Section 38(1) of the NHRA lists development activities that would require authorisation by the responsible heritage resources authority. Activities considered applicable to the proposed project include the following:

- "(a) The construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length;
- (c) Any development or other activity which will change the character of a site; (i) exceeding 5 000 m² in extent".

The NHRA requires that a person who intends to undertake a listed activity notify the relevant provincial heritage authority at the earliest stages of initiating such a development. The relevant provincial heritage authority would then in turn, notify the person whether a Heritage Impact Assessment (HIA) should be submitted. However, according to Section 38(8) of the NHRA, a separate report would not be necessary if an evaluation of the impact of such development on heritage resources is required in terms of the Environment Conservation Act (No. 73 of 1989) (now replaced by NEMA) or any other applicable legislation. The decision-making authority should, however, ensure that the heritage evaluation fulfils the requirements of the NHRA and take into account in its decision-making any comments and recommendations made by the relevant heritage resources authority.



2.5 NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE ACT 59 OF 2008

The National Environmental Management: Waste Act, 2008 (No. 59 of 2008) (NEM:WA) regulates all aspects of waste management and has an emphasis on waste avoidance and minimisation. NEM:WA creates a system for listing and licensing waste management activities. Listed waste management activities above certain thresholds are subject to a process of impact assessment and licensing. Activities listed in Category A require a Basic Assessment process, while activities listed in Category B require an EIA process. NEM:WA also provides for the setting of norms and standards for the storage and disposal of waste. These norms and standards are listed in GN R926 of 2013 (storage) and GN R636 of 2013 (disposal).

The proposed project does not trigger a Listed Activity in terms of NEM:WA, thus a Waste Management License for the project is not required. Any waste product produced would be disposed of via suitably qualified and licensed third-party service providers.

2.6 LEGISLATION CONSIDERED IN THE PREPARATION OF THE BAR

In accordance with the EIA Regulations 2014 (as amended), all legislation and guidelines that have been considered in the BA process must be documented. In addition to Sections 2.1 to 2.5, Table 2-3 provides a summary of other applicable legislation.

Table 2-3: Additional applicable legislation

Applicable legislation	Relevance
National Environmental Management: Biodiversity Act, 2004 (No. 10 of 2004)	The National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) (NEMBA), as amended, aims to provide for the management and conservation of South Africa's biodiversity within the framework of NEMA, the protection of species and ecosystems that warrant national protection, the sustainable use of indigenous biological resources and the fair and equitable sharing of benefits arising from bio-prospecting involving indigenous biological resources. The Act places severe restrictions on activities that could have adverse effects on threatened or protected species. The purpose of the Act includes the following: The management and conservation of South Africa's biodiversity within the framework of the National Environmental Management Act, 1998; The protection of species and ecosystems that warrant national protection; and The sustainable use of indigenous resources and the fair and equitable sharing of benefits arising from bioprospecting involving indigenous biological resources.



Applicable legislation	Relevance
	The Act makes provision for the protection of threatened or protected ecosystems and species as well as provisions guarding against the introduction of alien and invasive species. The Act identifies restricted activities involving listed threatened, protected or alien species. These activities include picking parts of, or cutting, chopping off, uprooting, damaging, or destroying, any specimen of a listed threatened or protected species. As stipulated in Section 57 of the Act, a person may not carry out a restricted activity involving a specimen of a listed threatened or protected species without a permit issued in terms of Chapter 7. A permit will be required to engage in restricted activities for the proposed project in accordance with Section 88 of the Act. DESTEA will be the Competent Authority for the application.
Conservation of Agricultural Resources Act, 1983 (No. 43 of 1983)	This Act provides for the control over the utilization of the natural agricultural resources of the country in order to promote the conservation of the soil, the water sources and the vegetation and the combating of weeds and invader plants. Section 5 of the Act prohibits the spread of weeds through the prohibition of their sale. GN R1084 (published under CARA) provides categories for the classification of the various weeds and invader plants, and restrictions where these species may occur. Regulation 15E of GN R1084 provides methods to be implemented for the control of weeds and invader species. CARA finds application throughout the project lifecycle of the proposed project. As a result, soil conservation and erosion prevention management and mitigation measures need to be implemented. Thus, a Weed Control and Management Plan must be developed and implemented for the duration of the project life cycle of the proposed project.
Subdivision of Agricultural Land Act, 1970 (Act No. 70 of 1970), as amended	The Subdivision of Agricultural Land Act, 1970 (Act No. 70 of 1970), as amended provides for the subdivision of all agricultural land within the Republic thereby prohibiting certain activities from being undertaken without consent from relevant authority, the Minister of the Department of Agriculture, Land Reform and Rural Development. This Act finds relevance to the proposed project as any portion of land that is zoned for agriculture and will need to be leased for a period exceeding 10 years is regulated by the Act.
National Forests Act, 1998 (No. 84 of 1998)	The National Forest Act (NFA) empowers the Minister of DFFE to declare and list a tree, group of trees, woodland, or a species of trees as protected. A list of protected tree species is included in GN R908, published in November 2014. Section 7 of the Act prohibits the cutting and disturbance of NFA-listed trees. A permit is required for the removal of NFA-listed tree species in terms of Section 4 of the Act. Prior to the submission of the permit application to the competent authority, a survey of the grid connection corridor is required in order to ascertain the presence and distribution of NFA-listed tree species. No NFA-listed trees have been confirmed within the grid connection corridor by the Terrestrial Biodiversity Specialist (refer to Appendix 8.1).



Applicable legislation	Relevance
National Veld and Forest Fire Act, 1998 (No. 10 of 1998)	The National Veld and Forest Fire Act (NVFA) in Chapter 4 requires landowners to prepare and maintain firebreaks, as well as the role of adjoining landowners and the fire protection association in an area. The Act through Chapter 5 requires all landowners to acquire firefighting equipment and have available personnel for firefighting. Landowners with land where a veldfire may start or burn or from whose land it may spread must have firefighting equipment and personnel available. There are no permitting requirements for the proposed project in accordance with the NVFA. However, it must be ensured that firebreaks within the boundaries of the study area are prepared and maintained and that firefighting equipment and personnel for the duration of the project life cycle of the proposed project is made available.
Occupational Health and Safety Act, 1993 (No. 85 of 1993) and Major Hazard Installation Regulations	This Act provides for the health and safety of persons at work and the protection of persons other than persons at work against hazards to health and safety arising out of or in connection with the activities of persons at work. Every employer shall provide and maintain, as far as is reasonably practicable, a working environment that is safe and without risk to the health of his employees. The construction and operation of the proposed project will include activities that are deemed as hazards and/risk to the health and safety of the employees employed on the project. Such hazards/risks should be managed in accordance with the relevant requirements of the Act.
Hazardous Substances Act, 1973 (Act No. 15 of 1973)	The Hazardous Substances Act, 1973 (Act No. 15 of 1973) (HAS) was promulgated to provide for the control of substances which may cause injury, ill-health, or death. Substances are defined as hazardous if their inherent nature is toxic, corrosive, irritant, strongly sensitising, flammable and pressure (under certain circumstances) which may injure ill-health, or death in humans. The Act provides for the division hazardous substances or products into four groups in relation to the degree of danger, the prohibition and control of the importation, manufacture, sale, use, operation, application, and disposal of such substances. Group 1: includes all hazardous substances defined in the Act; Group 2: substances include mixtures of Group 1 substances; Group 3: substances include substances found in certain electronic products (i.e., product with an electronic circuit); and Group 4: substances includes all radioactive substances. The use or sale of Group I, II and III hazardous substances is prohibited. Should the use of these substances be required for the proposed project, a permit application should be submitted to the Department of Health (DoH) in terms of Section of the Act.



Applicable legislation	Relevance
Municipal Systems Act, 2000 (Act No. 32 of 2000)	The Municipal Systems Act, 2000 (Act N. 32 of 2000) was promulgated for the administration of municipalities. The Act requires that the Constitution and other legislation, i.e., NEMA be incorporated into strategic plans at local government level. The Act regulates municipal service delivery and provides a comprehensive range of service delivery mechanisms through which municipalities may provide municipal services. The Act explains the process to be applied and the criteria to be considered in reviewing and selecting municipal service delivery mechanisms. The Act provides that each municipal council must adopt a single, inclusive, and strategic Integrated Development Plan (IDP) for the development of the municipality. At a municipal level, IDPs may require the implementation of renewable energy projects. As a result, Independent Power Producers (IPPs) should consult with the relevant structures of the municipality within which a development is located.
The Spatial Planning and Land Use Management Act, 2013 (No. 6 of 2013) (SPLUMA)	The Spatial Planning and Land Use Management Act, 2013 (Act No. 6 of 2013) aims to confirm and regulate the role of municipalities in land use planning and management. Objectives of the Act relevant to the proposed project ensure that the system of spatial planning and land use management promotes social and economic inclusion and to provide for the sustainable and efficient use of land. The current zoning of the project site is agriculture; thus, a rezoning application would be required to change the zoning of the site from agriculture to special purpose for the placement of the grid connection infrastructure, i.e., Transmission Line and Switching Station, etc.
Astronomy Geographic Advantage Areas Act, 2007 (Act No. 21 of 2007)	The then Minister of Science and Technology in 2010 declared all land in the Northern Cape Province situated 250 km from the centre of the South African Large Telescope Dome as an 'Astronomy Advantage Area (AAA)' for optical astronomy purposes and the whole of the territory of the province, excluding Kimberly as an astronomy advantage area for radio astronomy purposes. From a renewable energy perspective, wind energy projects are more likely to contravene the objects of the Act. As a result, the proposed project requires the construction and operation of grid connection infrastructure and the grid connection corridors assessed in this BAR are located outside of an Astronomy Advantage Area ⁶ , therefore the proposed project is not anticipated to contravene the objects of the Act.



Applicable legislation	Relevance
Civil Aviation Act, 2009 (Act No. 13 of 2009)	The Civil Aviation Act, 2009 (Act No. 13 of 2009) (CAA), governs civil aviation in the Republic. The Act provides for the establishment of a stand-alone authority mandated with the controlling, promoting, regulating, supporting, developing, enforcing, and continuously improving levels of safety and security throughout the civil aviation industry. This mandate is fulfilled by the South African Civil Aviation Authority (SACAA), an agency of the Department of Transport (DoT). The SACAA achieves the objectives of the Act by complying with the Standard and Recommended Practices (SARPs) of the International Civil Aviation Organisation (ICAO), while considering the local context when issuing the South African Civil Aviation Regulations (SA CARs). All proposed development or activities in South Africa that potentially could affect civil aviation must be assessed by SACCAA in terms of the CARs and the South African Civil Aviation Technical Standards (SA CATs) in order to ensure civil aviation safety. The SACAA will be provided with the BAR of the proposed project for their comment during the 30-day review and comment period.
National Traffic Act, 1996 (No. 93 of 1996)	The Act and the National Traffic Regulations, 2000 provide certain limitations on vehicle dimensions and axle and vehicle masses that a vehicle using a public road at any given time must comply with. Certain vehicles and loads cannot be moved on public roads without exceeding the limitations in terms of the dimensions and/or mass as prescribed. Where such a vehicle or load cannot be dismantled, without disproportionate effort, expense, risk, or damage, into units that can travel or be transported legally. Such load is classified as an abnormal load and is permitted to be transported on public roads under an exemption permit issued in terms of Section 81 of the Act. A permit application in terms of Section 81 of the Act will be required for the transportation of key infrastructure components (i.e., transformers, pylons, etc.) and machinery (i.e., tractor-loader backhoes, etc.) to the project site during the construction phase of the proposed project.
Free State Nature Conservation Ordinance Act, 1969 (Act No. 8 of 1969)	Chapter 4 and Section 30 of the Act prohibits any persons from removing indigenous species listed in Schedule 6 of the Act without a valid permit from the relevant authority. This Act finds relevance to the Scafell Cluster Project on the basis that protected plant species in terms of the Act may be present within the grid connection corridors and floral permits will be required from the relevant authority prior to the commencement of the construction phase for the removal of identified protected plant species. Mainstream will be required to obtain permits from the relevant authority for the removal of protected indigenous plant species in terms of the Act following the completion of the final site walkdown survey of the grid connection corridor and prior to the commencement of the construction phase.



2.7 GUIDELINES

The guidelines listed in Table 2-4 have been during the BA process.

Table 2-4: Guidelines considered in the BA process

Guideline	Governing Body	Relevance
Mitigating biodiversity impacts associated with solar and wind energy development (2021)	International Union of Conservation of Nature	Provides guidelines for mitigating biodiversity impact associated with the development of grid connection infrastructure for solar PV facilities.
Public Participation in terms of NEMA, EIA Regulations (2017)	DFFE	The purpose of this guideline is to ensure that an adequate public participation process is undertaken for the BA process.
Guideline on need and desirability in terms of the EIA Regulations (2014)	DFFE	These guidelines inform the consideration of the need and desirability aspects of the proposed project.



3. BA PROCESS APPROACH AND PROCESS

3.1 DETAILS OF THE PROJECT TEAM FOR BA PROCESS

The details of the BA process project team that were involved in the preparation of this BAR are provided in Table 3-1. SLR has no vested interest in the proposed project other than fair payment for consulting services rendered as part of the BA process and has declared its independence as required by the EIA Regulations 2014, as amended (see Appendix 1).

Table 3-1: Details of the Project Team

General				
Organisation	SLR Consulting (Sou	SLR Consulting (South Africa) (Pty) Ltd		
Postal address	PO Box 798 RONDEBOSCH 7701	RONDEBOSCH		
Tel No.	+27 (0)21 461 1118	/ 9		
Name	Qualifications	Professional registrations	Experience (Years)	Tasks and roles
Stuart-Heather Clark	B.Sc. (Hons) Civil Engineering M.Sc. Environmental Management	EAPASA IAIAsa	24	Report and process review
Nicholas Arnott	B.Sc. (Hons) Earth and Geographical Sciences	SACNASP (Pri.Sci. Nat)	15	Management of the EIA process, including process review, specialist study review, management of the public participation process and report compilation
Reuben Maroga	B.Sc. (Hons) Geology B.Sc. Environmental Management & Geology	N/A	3	Project administration, undertaking of public participation process activities and report compilation

3.2 QUALIFICATIONS AND EXPERIENCE OF THE EAP

Stuart Heather-Clark is a Technical Director in SLR's Environmental Management Planning and Approvals (EMPA) team in Africa. He holds a B.Sc. (Honours) in Civil Engineering and a Master's degree in Environmental Science and has 24 years of relevant experience. He has expertise in a wide range of environmental disciplines, including Environmental Impact Assessments (EIAs), Environmental Management Plans/Programmes (EMPs), environmental planning and review and public consultation and is a registered EAP with the Environmental Assessment Practitioners Association of South Africa (EAPASA).



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Nicholas Arnott has worked as an EAP since 2006 and has been involved in a number of projects covering a range of environmental disciplines, including Basic Assessments, EIAs and EMPs. He has gained experience in a wide range of projects relating to mining, oil and gas, renewables, infrastructure projects (e.g., roads), housing and industrial developments.

Reuben Maroga holds a B.Sc. in Environmental Management and a B.Sc. (Honours) in Geology and has worked as an EAP since 2018. His key focus is undertaking EIAs, Public Participation, and EMPs.

Curricula Vitae of the project team (including proof of professional membership) are attached in Appendix 1.

3.3 DETAILS OF THE INDEPENDENT SPECIALIST TEAM

In accordance with Regulation 2 of the EIA Regulations 2014 (as amended), the assessment of potential environmental and social impacts and benefits associated with any proposed activity that requires EA dictates that specialist, where relevant, depending on the nature and scale of the activity be appointed. As a result, a number of Specialists have been appointed for the proposed project to adequately identify and assess the potential impacts and benefits associated with the proposed project. Table 3-2 below includes the details of the Specialists that provided input into this BAR.

Table 3-2: Details of the Independent Specialist Team

Discipline	Company	Name	
Terrestrial Ecology	SAS Environmental	Stephen van Staden	
Aquatic Ecology	3A3 Environmental	Stephen van Staden	
Avifauna	Chris van Rooyen Consulting	Chris van Rooyen	
Soils, Agriculture and Land Potential	TerraAfrica Consultants CC	Mariné Pienaar – Blaauw	
Heritage (including Palaeontology)	HCAC	Jaco van der Walt	
Visual	Graham A Young Landscape Architect	Graham Young	
Social	Equispectives Research and Consulting Services	Dr Ilse Aucamp	
Traffic	Siyazi Group of Companies	Paul van der Westhuizen	

As per the Regulation 1 (b) of Appendix 6 of the EIA Regulations, Declarations of Interest declaring the independence of each of the Specialists on the proposed project are included in Appendix 10 of this BAR.

3.4 ASSUMPTIONS AND LIMITATIONS

- The assumptions pertaining to this BA are listed below:
- It is assumed that SLR has been provided with all relevant project information and that it was correct and valid at the time it was provided;
- It is assumed that the grid connection corridor identified for the construction and operation of the grid connection infrastructure by Mainstream is technically feasible based on the design and prefeasibility studies undertaken by technical consultants on the project.



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- There will be no significant changes to the project description or surrounding environment between the completion of the BA process and implementation of the proposed project that could substantially influence findings and recommendations with respect to mitigation and management, etc.; and
- Should any future infrastructure being proposed within the study area trigger additional listed activities
 not included in this BA process, a separate application process for EA would need to be undertaken and
 submitted to the relevant competent authority.

3.5 BA PROCESS

3.5.1 Objectives

In accordance with Appendix 1 to the EIA Regulations 2014 (as amended), the objectives of the BA process are to:

- Determine the policies and legislation relevant to the activity and document how the proposed activity complies with and responds to the policy and legislative context;
- Describe the need and desirability of the proposed activity in the context of the study area;
- Identify feasible alternatives related to the project proposal;
- Ensure that all potential key environmental issues and impacts that would result from the proposed project are identified;
- Assess potential impacts of the proposed project alternatives during the different phases of project development;
- Identify the most ideal location of the activity within the affected property based on the lowest level of environmental sensitivity identified during the assessment;
- Present appropriate mitigation or optimisation measures to avoid, manage or mitigate potential impacts or enhance potential benefits, respectively;
- Identify residual risks that need to be managed and monitored; and
- Provide a reasonable opportunity for I&APs to be involved in the BA process.

The undertaking of the above-mentioned activities as part of the BA process ensures an informed, transparent, and accountable decision-making process by the Competent Authority. The BA process consists of a series of steps to ensure compliance with these objectives and the EIA Regulations 2014 as set out in GN R982 (as amended by GN R326). The process involves an open, participatory approach to ensure that all impacts are identified, and that decision-making takes place in an informed, transparent, and accountable manner. A flowchart indicating the generic BA process is presented in



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3.5.2 Pre-Application Authority Consultation and Notification

SLR attended a pre-application meeting with DFFE on **19 January 2021**. The purpose of this meeting was to provide DFFE with an overview of the proposed Scafell Cluster Project and to obtain clarity on the legislative requirements and the approach to the Scoping and EIA⁷ and BA processes in order to ensure agreement on the way forward. Furthermore, the purpose of the meeting was also to discuss the proposed methodology to be followed for the undertaking of the specialist studies to support the applications for EA as well as the planned public participation process to be undertaken.

DFFE indicated that the listed activities identified for the proposed project suffice and reaffirmed that they are the competent authority for all NEMA listed activities related to the development of renewable energy projects in accordance with GN R779 of July 2016. It was pointed out that should additional listed activities be triggered based on a review of detailed project-specific information; these activities should be included in an updated application form that should be submitted to the Department. The project team indicated that a single and consolidated public participation process would be undertaken for the proposed Scafell Cluster Project given their proximity to each other. DFFE agreed with this approach and emphasized that consideration should be given to I&APs that would not necessarily have access to internet-enabled mobile phones so that they are able to receive project-related information and requested the project team to submit the Public Participation (PP) Plan for consideration. The PP Plan submitted to the DFFE and the proof of acceptance of the Plan by the Department is included Appendix 3.1 of this BAR.

The project team pointed out that due to the proximity of the proposed projects to each other, each specialist would produce a single specialist report for all the projects, i.e., one single report including separate impact assessments for the solar PV facilities and the grid connection. DFFE indicated that the approach was acceptable however it must be ensured that all project-specific information, i.e., mitigation, and management measures for each project are clearly stated and easily identifiable within the specialist reports.

3.5.3 Application for Environmental Authorisation

An 'Application Form for Environmental Authorisation' will be submitted to DFFE on **23 September 2021** at the same time as making this draft version of the BAR available for review and comment. PP activities completed to date in support of the application for Environmental Authorisation for the proposed project are outlined below:

SLR

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⁷ A Scoping and EIA process has been undertaken separately for each of the solar PV facilities.

TASKS UNDERTAKEN DURING AS PART OF THE PUBLIC PARTICIPATION PROCESS

• I&AP Identification

The I&AP database has been developed through a process of obtaining information from SLR's existing stakeholder database of projects in the area and liaison with potentially affected interested and affected parties within the surrounding area. Key stakeholders, including organs of state, affected and adjacent landowners have been identified and registered on the database (see Appendix 3.2).

Advertisements and Site Notices

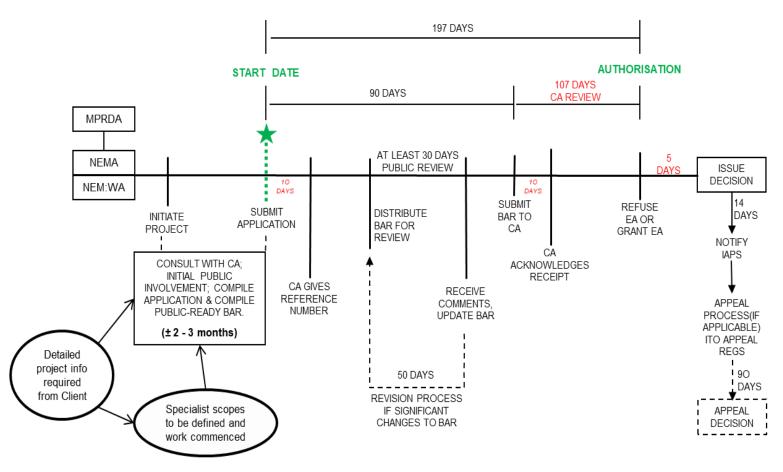
A newspaper advert, providing notification of the proposed project and the BA and EIA processes, was placed on 23 June 2021, at the start of the 30-day review and comment period for the Scoping Reports for each of the respective solar PV facilities. The advert was placed in the 'Vaal Week Blad' local community newspaper (see Appendix 3.3). The advert included the details of the grid connection projects which are aimed at connecting each of the solar PV facilities to the ESKOM Scafell MTS. Site notices (in English) have also been placed at the entrances of the project site and in the town of Sasolburg, where there is a lot of foot traffic (filling stations, supermarkets etc.), in order to advertise the BA and EIA processes being undertaken for the Scafell Cluster Project. Registered I&APs will be notified of the availability of the BARs for review and comment at the start of the 30-day review and comment period, and where comments can be submitted.



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2014 EIA REGS AUTHORISATION TIMELINE - BASIC ASSESSMENT



TIMEFRAMES IN RED - COMPETENT AUTHORITY (CA) TIMEFRAMES

Figure 3-1: Flow Diagram of a BA Process



3.5.4 Compilation of the BAR

This BAR has been prepared in compliance with Appendix 1 of the EIA Regulations 2014 (see Table 3-3). This report aims to present all information in a clear and understandable format suitable for easy interpretation by I&APs, State Departments/Organs of State, the competent and commenting authorities and provides an opportunity for I&APs to comment on the proposed project.

Table 3-3: Requirements of a BAR in terms of the EIA Regulations 2014 (as amended)

Appendix 1	Content of Scoping Report	Completed (Y/N or N/A)	Location in report
2(a)	(i & ii) Details and expertise of the Environmental Assessment Practitioner (EAP) who prepared the report, including a CV.	Y	Chapter 3
(b)	The location of the activity, including:	Υ	Figure 5-1
	(i) (i) the 21-digit Surveyor General code of each cadastral land parcel; or		
	(ii) (ii) where available, the physical address and farm name		
	(iii) (iii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties;		
(c)	A plan which locates the proposed activity or activities applied for at an appropriate scale, or, if it is:		
	(i) a linear activity, a description, and coordinates of the corridor in which the proposed activity or activities is to be undertaken;		
(d)	A description of the scope of the proposed activity, including all the listed and specified activities triggered and being applied for; and a description of the activities to be undertaken including associated structures and infrastructure;	Υ	Chapter 0
	(i) an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks, and instruments that are applicable to this activity and have been considered in the preparation of the report; and		
	(ii) how the proposed activity complies with and responds to the legislation and policy context, plans, guidelines, tools or frameworks, and instruments;		
(e)	A description of the policy and legislative context within which the development is proposed including -		
	(i) an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the preparation of the report;		



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Appendix 1	Content of Scoping Report	Completed (Y/N or N/A)	Location in report				
	(ii) how the proposed activity complies with and responds to the legislation and policy context, plans, guidelines, tools or frameworks, and instruments;						
(f)	A motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location;	Y	Chapter 4				
(g)	A motivation for the preferred site, activity, and technology Y Chapter 6 alternative;						
(h)	A full description of the process followed to reach the proposed preferred activity, site, and location within the site, including:						
	(i) details of all the alternatives considered;						
	(ii) details of the public participation process undertaken in terms of Regulation 41 of the Regulations, including copies of the supporting documents and inputs;	Y	Chapter 2				
	(iii) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;	To be included	in the FBAR				
	(iv) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;	Y	Chapter 7				
	 (v) the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration, and probability of the impacts, including the degree to which these impacts (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and 	Υ	Chapter 8 Appendix 10				
	(cc) can be avoided, managed, or mitigated.						
	(vi) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;						
	(vii) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;						
	(viii) the possible mitigation measures that could be applied and level of residual risk;	Υ	Chapter 8				
	(ix) the outcome of the site selection matrix;	Υ	Chapter 6				
	(x) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and	Y	Chapter 6				
	(xi) a concluding statement indicating the preferred alternatives, including preferred location of the activity.	Υ	Chapter 9				



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Appendix 1	Content of Scoping Report	Completed (Y/N or N/A)	Location in report	
(i)	A full description of the process undertaken to identify, assess and rank the impacts the activity will impose on the preferred location through the life of the activity, including -	Υ	Chapter 8 Appendix 10	
	(i) a description of all the environmental issues and risks that were identified during the environmental impact assessment process; and			
	(ii) an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adaptation of mitigation measures;			
(j)	An assessment of each identified potentially significant impact and risk, including -	Y	Chapter 8	
	(i) cumulative impacts;			
	(ii) the nature, significance and consequences of the impact and risk;			
	(iii) the extent and duration of the impact and risk;			
	(iv) the probability of the impact and risk;			
	(v) the degree to which the impact and risk can be reversed;			
	(vi) the degree to which the impact and risk can be avoided, managed, or mitigated;			
	(vii) the degree to which the impact and risk can be avoided, managed, or mitigated;			
(k)	Where applicable, a summary of the findings and impact management measures identified in any specialist report complying with Appendix 6 of these Regulations and an indication as to how these findings and recommendations have been included in the final report;	Υ	Chapter 8 Chapter 9	
(1)	An environmental impact statement which contains -	Υ	Chapter 9	
	(i) a summary of the key findings of the environmental impact assessment;			
	(ii) a map at an appropriate scale which superimposes the proposed activity and its associated infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and			
	(iii) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;			
(m)	Based on the assessment, and where applicable, impact management measures from specialist reports, the recording of the proposed impact management outcomes for the development for inclusion in the EMPr;			



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Appendix 1	Content of Scoping Report	Completed (Y/N or N/A)	Location in report			
(n)	Any aspects which were conditional to the findings of assessment either by the EAP or specialist which are to be included as conditions of authorisation;					
(0)	A description of any assumptions, uncertainties, and gaps knowledge which relate to the assessment and mitigat measures proposed;					
(p)	A reasoned opinion as to whether the proposed activity should should not be authorised, and if the opinion is that it should authorised, any conditions that should be made in respect of the authorisation;	be				
(q)	Where the proposed activity does not include operational aspective period for which the environmental authorisation is required the date on which the activity will be concluded, and the proposition construction monitoring requirements finalised;	ed,				
(r)	An undertaking under oath or affirmation by the EAP in relation:	ion Y	Appendix 1			
	(i) the correctness of the information provided in report;	the				
	(ii) the inclusion of comments and inputs from stakeholders and interested and affected particular and					
	(iii) any information provided by the EAP to interest and affected parties and any responses by the EAF comments or inputs made by interested or affect parties;	P to				
(t)	Any specific information required by the competent authority; a	and N/A				
(u)	Any other matter required in terms of Section 24(4)(a) and (b) of the Act.					

3.5.5 Screening Tool and Specialist Studies

In accordance with GN R960 of 5 July 2019 and Regulation 16(1)(b)(v) of the EIA Regulations, 2014 (as amended), the submission of a Screening Report generated from DFFE's national web-based screening tool is considered compulsory for the submission of applications for EA in terms of Regulations 19 and 20 of the EIA Regulations 2014 (as amended). The requirement of the submission of a Screening Report is triggered by the application for EA for the proposed project as the application falls within the ambit of Regulation 19 of the EIA Regulations 2014 (as amended). The specialist assessments/theme, sensitivity ratings identified by the Screening Tool and, in accordance with GN R320 of 20 March 2020, the outcomes of the site verification are summarised in Table 3-4 below. The detailed findings of the specialists relating to the outcome of the Site Sensitivity Verification is set out in the Site Sensitivity Verification reports (see Appendix 5). Where required, the specialist studies will be undertaken with the requirements of GN R320 of 20 March 2020 and any updates thereto. Where no protocols have been provided, the specialist assessment will be undertaken in accordance with Appendix 6 of the EIA Regulations, 2014 (as amended).



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Table 3-4: Specialist Assessments and Sensitivity Ratings identified by the DFFE's web-based Screening Tool

Specialist Assessment / Theme	Sensitivity Rating as per Screening Report	Sensitivity Rating as per Specialist / EAP Verification	Response					
Agriculture	High	Low to High	A Soil and Agricultural Agro-Ecosystem Specialist Assessment has been undertaken for the proposed project and is included in Appendix 8.4 of this BAR.					
Landscape / Visual Impact Assessment	-	-	A Visual Impact Assessment has been undertaken for the proposed project and is included in Appendix 8.6 of this BAR.					
Archaeological and Cultural Heritage	Low	Medium	As archaeological features were identified within the study area, the site is deemed to be of high sensitivity However, no conservation worthy heritage resource were located within the grid connection corrido					
Palaeontology	Very High	Low to Moderate	alternatives for the proposed project. A Heritage Impact Assessment and desktop Paleontological Impact Assessment has been undertaken for the proposed project and is included in Appendix 8.6 of this BAR.					
Terrestrial Biodiversity	Very High	High	A Terrestrial Biodiversity Impact Assessment has been undertaken for the proposed project and is included in Appendix 8.1 of this BAR.					
Aquatic Biodiversity	Low	Very High	While the Screening Tool identified the site as being of "low sensitivity" for aquatic biodiversity, the freshwater specialist identified an unchanneled valley bottom wetland 49 m from the western boundary of the site. Thus, a Freshwater Impact Assessment will be undertaken in accordance with the "Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Aquatic Biodiversity".					
Avian	-	Low	The Specialist deemed the study area to be of low sensitivity as there were no species of conservation concern (SCC) confirmed during the site sensitivity verification survey, and the study area is not located within an Important Bird Area (IBA). Thus, an Avifaunal Compliance Statement has been compiled for the proposed project and is included in Appendix 8.3 of this BAR.					
Civil Aviation	Medium	Medium	The South African Civil Aviation Authority (SACAA) he been identified as a key stakeholder on the project database and will be afforded an opportunity provide comments of the Scoping Report during to 30-day review and comment period. In accordance is a second comment period.					



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Specialist Assessment / Theme	Sensitivity Rating as per Screening Report	Sensitivity Rating as per Specialist / EAP Verification	Response
			with the specialist screening protocols, a Civil Aviation Compliance Statement will be prepared.
Defence	Low	Low	There are no military bases / facilities present within the vicinity of the study area. The nearest military base is Bloemspruit Air Force Base, located 282 km south of the project site outside Bloemfontein in the Free State Province. Thus, no further assessment is deemed necessary from a defence perspective.
RFI	Low	Low	The study area for the Scafell Cluster Project falls outside of the Karoo Central Astronomy Advantage Area (KCAAA). SARAO has been identified as a stakeholder on the project database and will be afforded with the opportunity to provide comments during the 30-day review and comment period of this BAR. No further assessment is deemed necessary.
Geotechnical	-	-	Mainstream will undertake a detailed Geotechnical Assessment of the preferred grid connection corridor for the proposed project post the BA process and prior to the commencement of the construction phase.
Plant Species	Medium	Medium	These requirements are addressed in the Terrestrial Biodiversity Impact Assessment included in Appendix
Animal Species	Medium	Medium	8.1 of the BAR.

Appendix 8 of this BAR includes the Specialist Studies undertaken for the proposed project. All Specialist Studies undertaken involved the gathering of data (desktop and site verification, where required) relevant to ground-truthing and assessing environmental impacts that may occur as a result of the proposed project. The identified environmental impacts have been assessed in accordance with the SLR Impact Assessment Methodology (see Chapter 8). Specialists have also recommended appropriate mitigation or optimisation measures to minimise potential impacts or enhance potential benefits associated with the proposed project.



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4. **NEED & DESIRABILITY**

The DFFE [known then as the Department of Environmental Affairs (DEA)] Guideline on Need and Desirability (GN R891, 2014) notes that while addressing the growth of the national economy through the implementation of various national policies and strategies, it is also essential that these policies take cognisance of strategic concerns such as climate change, food security, as well as the sustainability in supply of natural resources and the status of South Africa's ecosystem services. Thus, the over-arching framework for considering the need and desirability of development in general is taken at the policy level, through the identification and promotion of activities / industries / developments required by civil society as a whole. The DFFE guideline further notes that at a project level (i.e., as part of a BA process), the need and desirability of the project should take into consideration the content of regional and local plans, frameworks, and strategies. Taking the above into consideration, this section of the report aims to provide an overview of the need and desirability for the proposed Scafell Cluster Project, by highlighting how the proposed project is aligned with the strategic context of international, national, regional, and local development policy and planning, as well as broader societal needs (as appropriate).

4.1 INTERNATIONAL POLICY AND PLANNING FRAMEWORK

4.1.1 United Nations Framework Convention on Climate Change and Kyoto Protocol

The United Nations Framework Convention on Climate Change (UNFCCC, 1992) is an international environmental treaty aimed at addressing climate change, which was negotiated and signed by 154 countries at the United Nations Conference on Environment and Development (UNCED), informally known as the 'Earth Summit', held in Rio de Janeiro (Brazil) from 3 to 14 June 1992. The primary objective of this international environmental treaty is to stabilize greenhouse gas emissions in the atmosphere to a level that prevents harmful / dangerous human-induced interference with the earth's climate system. The treaty places an obligation on signatory countries such as South Africa to adopt national policies and take measures to mitigate the impacts of climate change by limiting their anthropogenic (i.e., man-made) emissions of greenhouse gases, as well as to report on the steps undertaken to return their emissions to pre-1990 levels. The treaty called for on-going scientific research and regular meetings, negotiations and future policy agreements designed to allow ecosystems to adapt naturally to climate change, in order to enable economic development to proceed in a sustainable manner. In addition, the treaty requires more developed economies (such as the United States of America) to provide financial resources to meet the costs incurred by developing nations (such as South Africa) in complying with their obligations to produce national inventories of their emissions.

The UNFCCC (1992) laid the foundation for the implementation of the Kyoto Protocol, which was signed by Parties in 1997 and enforced in 2005. In 2016, the UNFCCC was superseded by the 2016 Paris Agreement, which is a legally binding international treaty on climate change.

The Kyoto Protocol (1998) marked the implementation of the first measures of the UNFCCC and applies to six (6) greenhouse gases, namely Carbon Dioxide (CO_2); Methane (CH_4); Nitrous Oxide (N_2O); Hydrofluorocarbons (HFCs); Perfluorinated Compounds (PFCs) and Sulfur Hexafluoride (SF_6). The protocol primarily puts into operation the aims of the UNFCCC (1992) by committing industrialised countries and economies in transition to limit and reduce their greenhouse gas emissions, in accordance with the agreed individual targets. The protocol requires signatories to adopt policies, measures on mitigation and to report greenhouse gas emissions



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periodically⁸. South Africa is the world's 14^{th} largest emitter of greenhouse gases and accounts for the highest emissions of CO_2 in Africa⁹. South Africa's emissions are a result of its reliance on the combustion of fossil fuels (such as coal) for the generation of electricity. In 2019, South Africa emitted approximately 478.61 million tonnes of CO_2 annually, with 279.9 million tonnes of this as a result of electricity generation¹⁰.

In order to fulfil the requirements of the UNFCCC (1992) and the Kyoto Protocol (1998), the South African government has developed legislation and policy to provide the framework for indicating how commitments to reduce greenhouse gas emissions will be met. These policies include the National Climate Change Response Policy (2011), Draft Climate Change Bill (2018) and the Carbon Tax Act (Act No. 15 of 2019). These policies are explored further in Section 4.2 of this BAR. Taking the above into consideration, the proposed development of the Scafell Cluster Project will generate at least 525 MW_{ac} of electricity from renewable energy (namely solar energy), thereby reducing government reliance on electricity generation from the combustion of fossil fuels, which leads to the inevitable release of greenhouse gases such as CO₂ into the atmosphere. From this perspective, taking the information above into consideration, the proposed Scafell Cluster Project is in alignment with the obligations placed on South Africa in response to climate change through the UNFCCC (1992) and the Kyoto Protocol (1998).

4.1.2 Paris Agreement

The Paris Agreement is an international agreement / treaty, in terms of the UNFCCC, on climate change, which was adopted in 2015. It addresses mitigation, adaptation and finance and was adopted at the 2015 United Nations Climate Change Conference (COP21), which was held in Le Bourget near Paris, France. The Paris Agreement was opened for signature on 22 April 2016. The agreement aims to improve upon and replace the Kyoto Protocol by committing countries to keeping the long-term rise of global temperatures below 2°C, above pre-industrial levels, and to pursue efforts to limit the increase to 1.5°C, thereby recognizing that this would substantially reduce the risks and impacts of climate change.

South Africa signed the Paris Agreement and submitted its pledge in 2016. The pledge is also known as the 'Nationally Determined Contribution' or NDC. According to the pledge, South Africa adopted a 'peak, plateau and decline' approach, whereby it is anticipated the greenhouse gas emissions will peak by 2025, plateau for a decade and then start to decline. By signing the agreement, countries are required to adopt the conditions of the agreement into their own legal systems through ratification, acceptance, approval, or accession. The agreement will become enforceable when ratified / approved by at least 55 countries, which together account for at least 55 % of the global greenhouse gas emissions.

By prioritising the procurement of electricity from renewable energy technologies through the Integrated Resources Plan (IRP) and the REIPPPP, government has begun acting on the obligations of the Paris Agreement. The development of the Scafell Cluster Project, which will contribute at least 525 MW_{ac} of electricity from renewable energy (namely solar energy), will thus aid the South African government in reaching its target to peak with greenhouse gas emissions by 2025. From this perspective, the proposed Scafell Cluster Project aligns with the Paris Agreement, as well as any subsequent updates thereto.



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⁸What is the Kyoto Protocol? | UNFCCC. Accessed on 7 April 2021

⁹ The Carbon Brief Profile: South Africa | Carbon Brief. Accessed on 7 April 2021

¹⁰ https://ourworldindata.org/co2/country/south-africa. Accessed on 7 April 2021

4.2 NATIONAL POLICY AND PLANNING FRAMEWORK

4.2.1Energy White Paper, 1998

The 1998 White Paper on the Energy Policy of the Republic of South Africa is the primary policy document which guides all subsequent policies, strategies, and legislation within the energy sector. It provides specific policy statements on what government intends for the energy system as a whole and sets out five (5) key objectives. These objectives have subsequently formed the foundation and informed the development of energy policy in South Africa and still remain relevant. Various other energy policies have been developed and are in different stages of implementation. Some of the key policies developed following the 1998 White Paper on Energy Policy include:

- The White Paper on Renewable Energy, 2003;
- The National Energy Efficiency Strategy of the Republic of South Africa, 2008; and
- The Integrated Resources Plan 2010.

The proposed Scafell Cluster Project will have a total generating capacity of up to 525 MW_{ac}. Grid connection infrastructure will be required in order to feed the generated electricity into the grid for consumption by industries, businesses, and households. Thus, this capacity will, most likely, through the REIPPPP aid government meet its targets of ensuring energy security and supply as per the objectives of the provisions of the 1998 White Paper on Energy Policy.

4.2.2 Integrated Energy Plan, 2016

The development of a National Integrated Energy Plan (IEP) was envisaged in the White Paper on the Energy Policy of the Republic of South Africa of 1998, and in terms of the National Energy Act, 2008 (No. 34 of 2008) which places an obligation on the Minister of the DMRE to publish the IEP in the Government Gazette. The intention of the IEP is to provide a roadmap of the future of the energy landscape for South Africa which guides future energy infrastructure investments and policy development. The National Energy Act, 2008 (No. 34 of 2008) requires the IEP to have a planning horizon of no less than 20 years. The development of the IEP is therefore a continuous process at it needs to be reviewed periodically to consider changes in the macroeconomic environment, developments in new technologies and changes in national priorities and imperatives.

As a fast-emerging economy, South Africa needs to balance the competing need for continued growth with its social needs and the protection of the natural environment. South Africa needs to grow its energy supply to support economic expansion and in so doing, alleviate supply bottlenecks and supply-demand deficits. In addition, it is essential that all citizens are provided with clean and modern forms of energy at an affordable price. From the myriad of factors which had to be considered and addressed during the Integrated Planning Process, eight (8) key objectives were identified:

- Objective 1: Ensure security of supply;
- Objective 2: Minimise the cost of energy;
- Objective 3: Promote the creation of jobs and localisation;
- Objective 4: Minimise negative environmental impacts from the energy sector;
- Objective 5: Promote the conservation of water;
- Objective 6: Diversify energy supply sources and primary sources of energy;



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- Objective 7: Promote energy efficiency in the economy; and
- Objective 8: Increase access to modern energy.

In the 2016 Draft, the IEP indicates the South Africa is endowed with renewable energy resources in the form of solar irradiation, and wind in coastal and mountainous areas, which have in the past remained untapped. In addition, the country receives a substantial amount of sunlight to support a sustainable solar power industry. The Northern Cape Province is considered one of the world's highest solar irradiation areas in the world. The IEP indicates that the daily solar irradiation in South Africa varies between 4.5 and 6.5 kilowatt hours per square meter (KWh/m²). The total area of high solar irradiation in South Africa amounts to 194 000 km², including the Northern Cape Province. With electricity per square kilometre of mirror surface in solar power station being 30.2 MW, and just 1 % of the high radiation area in the country being made available for solar power generation, the generation potential is approximately 64 GW. Solar energy has the potential to contribute quite substantially to South Africa's future energy needs. This would, however, require large investments in transmission lines from areas of high radiation, such as the Northern Cape Province and the main electricity consumer centres.

The proposed Scafell Cluster Project includes the development of solar PV facilities and grid connection infrastructure to produce and feed 525 MW_{ac} from solar energy into the grid. Thus, the proposed project is aligned with the precepts of the IEP in exploring renewable energy sources in the country in order to ensure a security of supply to promote the creation of jobs whilst minimising negative environmental impacts within the energy sector. Solar PV facilities and grid connection infrastructure have limited water requirements in comparison to other energy generation technologies (i.e., coal-fired power stations, etc.), which further supports the objectives of the IEP regarding the promotion of water conservation. As a result, the construction and operation of the proposed project supports the objectives of the IEP from a need and desirability perspective.

4.2.3 Integrated Resources Plan, 2019

The IRP, published in 2010 and promulgated in March 2011 and is a subset of the IEP is an electricity capacity plan which aims to provide an indication of the country's electricity demand, how this demand will be supplied and what it will cost. The recent IRP 2019 supports a diverse energy mix and presents policy interventions to ensure energy security for South Africa's electricity supply. Following the promulgation of the IRP 2010, a total of 18 000 MW of new generation capacity has been committed which comprises 9 564 MW of coal power from the Medupi and Kusile power stations, and 1 332 MW from the Ingula Pump Storage Project, 6 422 MW from renewable energy facilities and Independent Power Producers (IPPs), 1 055 MW from Open Cycle Gas Turbine Peaking Plants that will use diesel¹¹. Through the IRP 2019, government recognises that coal will continue to play a significant role in electricity generation given the abundance of coal reserves. However, the existing ESKOM fleet of coal-fired power stations will be decommissioned until 2030 and only then will 1 500 MW be procured from coal-fired power sources. From a renewable energy perspective, government has allocated

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¹¹ https://www.miningreview.com/energy/what-you-need-to-know-south-africas-integrated-resource-plan-2019/. Accessed on 7 April 2021.

6 000 MW of new capacity to be procured from solar PV facilities between 2022 and 2030. Figure 4-1 illustrates a snapshot of South Africa's energy mix to date, as presented in the IRP 2019¹².

In line with the IRP 2019, the DMRE launched a Risk Mitigation Independent Power Producer Procurement Programme (RMIPPPP) in August 2020¹³ to fill the current 2 000 MW short-term supply gap of electricity between 2019 and 2022 to alleviate supply constraints and reduce the extensive need of diesel-based peaking electrical generators. Due to the nature of the Risk Mitigation Independent Power Producers Procurement Programme, the objective of the DMRE was to procure energy from projects that were near ready. By December 2020, at least 28 bidders with near ready projects submitted bids to the DMRE to potentially supply the required 2 000 MW. These projects comprised gas, solar, wind and hybrid energy¹⁴ projects. In March 2021, the DMRE announced eight successful preferred bidder projects to supply 2 000 MW to the grid. Following the announcement of the preferred bidders for the RMIPPPP, the DMRE further announced Request for Proposals (RFPs) for the procurement of 2 600 MW from renewable energy sources will be issued as part of the upcoming Bidding Round 5 of the REIPPPP¹⁵. Bidding Round 5 will comprise 1 600 MW from wind and 1 000 MW from solar PV facilities.

	Coal	Coal (Decommis- sioning)	Nuclear	Hydro	Storage	PV	Wind	CSP	Gas & Diesel	Other (Distributed Generation, CoGer Biomass, Landfill)
Current Base	37,149		1860	2,100	2 912	1 474	1 980	300	3 830	499
2019	2,155	-2,373					244	300		Allocation to the
2020	1,433	-557				114	300			extent of the short
2021	1,433	-1403				300	818			term capacity and
2022	711	-844			513	400 1,000	1,600			energy gap.
2023	750	-555				1000	1,600			500
2024			1,860				1,600		1000	500
2025						1000	1,600			500
2026		-1,219					1,600		-	500
2027	750	-847					1,600		2000	500
2028		-475				1000	1,600			500
2029		-1,694			1575	1000	1,600			500
2030		-1,050		2,500		1000	1,600			500
TOTAL INSTALLED CAPACITY by 2030 (MW)	33,364		1,860	4,600	5,000	8,288	17,742	600	6,380	
% Total Installed Capacity (% of MW)	43		2.36	5.84	6.35	10.52	22.53	0.76	8.1	
% Annual Energy Contribution (% of MWh)	58.8		4.5	8.4	1.2*	6.3	17.8	0.6	1.3	

- Installed Capacity
 Committed/Already Contracted Capacity
 Capacity Decommissioned
 New Additional Capacity
 Extension of Koeberg Plant Design Life
 Includes Distributed Generation Capacity
 for own use
- 2030 Coal Installed Capacity is less capacity decommissioned between years 2020 and 2030.
- Koeberg power station rated/installed capacity will revert to 1,926MW (original design capacity) following design life extension work.
- Other/ Distributed generation includes all generation facilities in circumstances in which the facility is operated solely to supply electricity to an end-use customer within the same property with the facility.
- · Short term capacity gap is estimated at 2,000MW.

Figure 4-1: Snapshot of the IRP 2019

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https://www.cliffedekkerhofmeyr.com/en/news/publications/2019/Corporate/energy-alert-22-october-The-Integrated-Resource-Plan-2019-A-promising-future-roadmap-for-generation-capacity-in-South-Africa.html. Accessed on 7 April 2021.

ipp-rm.co.za. Accessed on 7 April 2021.

Refers to facilities that utilise an integration of several types of energy generation equipment such as electrical energy generators, electricity energy storage systems, and renewable energy sources.

¹⁵ https://www.politicsweb.co.za/documents/the-preferred-bidders-for-the-rmipppp--gwede-manta. Accessed on 7 April 2021.

Taking the above into consideration, the proposed Scafell Cluster Project has a total generating capacity of up to 525 MW_{ac} and it is understood that Mainstream will bid the projects into the REIPPPP, or in other renewable energy bidding programmes for IPPs upon receiving a positive EA from DFFE. Considering that the project will utilise solar PV technology to generate electricity, the project is aligned with the targets of the IRP 2019 for the procurement of 6 000 MW from solar PV facilities by 2030.

4.2.4 Renewable Energy Independent Power Producer Procurement Programme

The Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) is a competitive tender process that was launched to facilitate private sector investment into grid-connected renewable energy generation. Through the REIPPPP, government intends to enhance its power generation capacity, reduce reliance on the combustion of fossil fuels for the generation of electricity, stimulate an indigenous renewable energy industry and contribute to socio-economic development and environmentally sustainable growth. The programme supports the implementation of the National Development Plan and is centred on the procurement of electricity produced by the private sector through Independent Power Producers. Technologies such as solar photovoltaic amongst others are currently considered under the programme as IRP 2019 has made an allocation for the procurement of up to 6 000 MW from solar PV facilities.

The programme evaluates projects through various criterion which include job creation, local content, enterprise development and socio-economic development. The requirement from each criterion is summarised below.

(i) Job Creation

Under the REIPPPP, this criterion requires IPPs to disclose the percentage of the project's total jobs that will be awarded to South African citizens, especially historically disadvantaged community members within communities where projects are located (Eberhard, 2015). The Scafell Cluster Project will provide at least 3 980 employment opportunities¹⁶ for the duration of the construction and operation phase of the project to local communities within the vicinity of the study area.

(ii) Local Content

This criterion requires IPPs to spend a certain percentage of the total value project value in South Africa to ensure that the country derives positive economic benefits from the implementation of these projects. To date, REIPPPP projects have attracted at least USD 20.5 billion in investment into the South African economy. For the Scafell Cluster Project, at least 45 % of the Capital Expenditure from the project will be spent in South Africa.

(iii) Enterprise Development

This criterion intends to direct investment from IPPs towards Exempted Micro Enterprises and Qualifying Small Enterprises that are owned by historically disadvantaged women. Since its inception, the REIPPPP has directed at least R6 billion towards enterprise development (Eberhard and Naude, 2015).

¹⁶ This will be subject to all four solar PV facilities and grid connection infrastructure being granted environmental authorisations by the DFFE and awarded preferred bidder status under the REIPPPP.



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(iv) Socio-economic Development

This criterion aims to direct funding to socio-economic initiatives in such a way that a project has a positive socio-economic impact on an area by funding initiatives and projects related to improvements in healthcare, infrastructure, and education. This criterion requires that this funding be directed towards initiatives within the project area. IPPs are required to spend a threshold of 1 % of the project revenue towards these initiatives with a target of up to 1.5 %. According to Eberhard and Naude (2015), R9.3 billion was pledged to socio-economic developments in Bidding Round 4.

Taking the above into consideration, socio-economic initiatives with focus on improving healthcare, infrastructure, and education within the study area of the Scafell Cluster Project will derive positive economic benefits from the implementation of the project through this criterion that IPPs are required to meet under the REIPPPP.

4.2.5Renewable Energy Development Zones and Strategic Transmission Corridors

In 2015, the DFFE (then known as the DEA), through the Council for Scientific and Industrial Research (CSIR), embarked on a programme of Strategic Environmental Assessments (SEAs) for large-scale developments to support Strategic Integrated Projects (SIPs). The intention of the SEAs was to pre-assess environmental sensitivities within development areas at a regional scale in order to simplify site-specific EIAs when they are undertaken and to focus the assessment on addressing the specific sensitivities of the site. The outcome of the programme led to the identification of eight (8) Renewable Energy Development Zones (REDZ) meant for the development of large-scale wind and solar renewable energy facilities in terms of SIP 8: Green Energy in Support of the South African Economy, as well as the associated Strategic Transmission Corridors meant for the development of grid connection infrastructure (power lines and substation) in terms of SIP 10: Electricity Transmission and Distribution. Following the undertaking of further SEAs by the CSIR, the DFFE (through GN R144 which was published on 26 February 2021) identified three (3) additional REDZs for the development of large-scale wind and solar renewable energy facilities. These three (3) additional REDZs are within the Mpumalanga, North West, and Western Cape Provinces. The additional REDZs which have been identified and formally gazetted include the Emalahleni REDZ (REDZ 9), Klerksdorp REDZ (REDZ 10) and Beaufort West REDZ (REDZ 11). Furthermore, in 2021 the DFFE issued GN R383 (published on 29 April 2021) which identifies two (2) additional Strategic Transmission Corridors within the Northern Cape and KwaZulu-Natal Provinces for the development of large-scale grid connection infrastructure. The identified Strategic Transmission Corridors include the Expanded Western Corridor and Expanded Eastern Corridor.

Should a proposed renewable energy project (such as this project) fall within one (1) of the eleven (11) REDZs which have formally been gazetted in South Africa, a BA process can be followed instead of a full Scoping and EIA process. In addition, a reduced decision-making timeframe (namely 57 days, as opposed to 107 days) for processing of applications for EA by the competent authority (namely the DFFE) will be applicable. With regards to the Strategic Transmission Corridors, a BA process and reduced decision-making timeframe will also be applicable should the entire extent of the grid connection infrastructure (power lines and /or substations) being proposed be located within one (1) of the Strategic Transmission Corridors which have formally been gazetted in South Africa.

It should be noted that the solar PV facilities which form part of the proposed Scafell Cluster Project are not located within any of the eleven (11) REDZs which have formally been gazetted in South Africa. As a result, the



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applications for EA for the solar PV facilities require the undertaking of full Scoping and EIA processes, in accordance with Regulation 21 – 24 of the 2014 EIA Regulations (as amended). In addition, the applications will be considered within a period of 107 days from the day of acknowledgment of receipt of the final EIA Report by the DFFE. For the proposed project, the grid connection corridor alternatives are located within one (1) of the Strategic Transmission Corridors, namely the Central Corridor (see Figure 4-2). However, due to the capacity of the grid connection infrastructure being below 275 kV, the proposed project does not fulfil the requirements of GN R118 of 2018. As such, the proposed project is thus subject to a BA process in accordance with Regulation 19 and 20 of the 2014 EIA Regulations (as amended).

4.2.6 National Climate Change Response Strategy

The need for a National Climate Change Response Strategy was recognised as an urgent requirement by government during the ratification process of the UNFCCC in 1997. The document notes that climate change is a 'cross cutting issue that affects the entire economy as well as many specific sectors including energy, transport, agriculture, water resources management and provision of water services and health'. The aim of the strategy is to promote and maximise the integration of the government department programmes whilst minimising negative impacts associated with climate change.

Taking into consideration that South Africa is the largest emitter of greenhouse gas emissions on the continent and 14th worldwide, as well as the fact that majority of these emissions are from electricity generation through the combustion of fossil fuels (such as coal), the proposed Scafell Cluster Project will positively contribute towards the reduction in greenhouse gas emissions - a key objective of the National Climate Change Response Strategy. The proposed Scafell Cluster Project is therefore considered to be aligned with the aims of the National Climate Change Response Strategy.

4.3 REGIONAL, LOCAL POLICY AND PLANNING FRAMEWORK

A summary of provincial and local planning policies in the Free State Province aligned to the proposed project as well the suitability of the study area for the development of solar PV facilities and grid connection infrastructure are described below. The proposed construction and operation of the Scafell Cluster Project is considered to be in alignment with provincial and local planning policies of the Free State Province although the contributions to planning objectives from the proposed project will be negligible.

4.3.1 Free State Provincial Growth and Development Strategy, 2005 – 2014

The objectives of the Free State Provincial Growth and Development Strategy include the following:

- Stimulate economic development;
- Develop and enhance the infrastructure for economic growth and social development;
- Poverty alleviation through human and social development;
- Ensure a safe and secure environment for all the people of the province; and
- Promote effective and efficient governance and administration.



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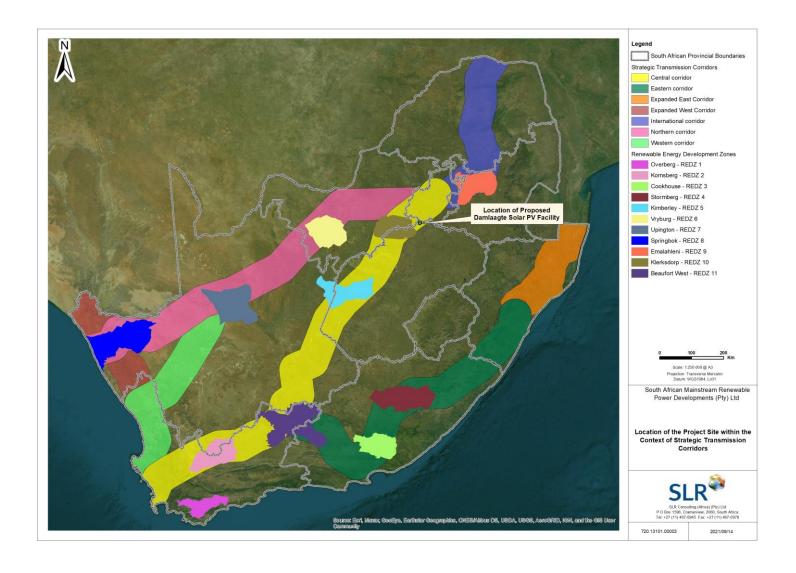


Figure 4-2: Location of the study area within the context of the REDZ and Strategic Transmission Corridor



The construction and operation of the proposed Scafell Cluster Project is aligned to the objectives of the Free State Provincial Growth and Development Strategy, as the implementation of the project will stimulate the local economy within the towns Sasolburg and Parys. Stimulation of the local economy will be as a result of the creation of employment and business opportunities for residents within the vicinity of the study area. The project will require numerous support services which can be rendered by Small Medium and Micro Enterprises (SMMEs) within the surrounding area during the construction and operation phase. Support services that will be required and can be provided by the SMMEs within the project area include, waste and sewage removal, security services, transportation of staff and the supply of construction material (i.e., sand and cement).

4.3.2 Fezile Dabi District Municipality Reviewed Integrated Development Plan, 2010 - 2021

The vision statement of the Fezile Dabi District Municipality IDP states, 'Improving the lives of citizens and progressively meeting their basic, social and economic needs, thereby restoring community confidence and trust in government'. The IDP on electricity and energy indicates that approximately 11 926 households do not have access to electricity within the municipal area of the Fezile Dabi District Municipality and further indicates that the electricity, gas, and water sectors within the District Municipality provide the least employment opportunities, contributing approximately 1%. In addition, the Fezile Dabi District Municipality within the IDP has made provision for three electrification projects to be implemented between 2020 – 2021 within its municipal area.

Given that at least 11 926 households do not have access to electricity within the municipal area of the Fezile Dabi District Municipality, the addition of 525 MW_{ac} from the Scafell Cluster Project will provide much needed capacity to the grid and aid the municipality in meeting some of its targets for the electrification of communities. The development of the proposed project will ensure that the 525 MW_{ac} from the proposed solar PV facilities is added to the grid which will be made available to industries, businesses, and residents. Furthermore, indirect positive socio-economic benefits of the proposed project, i.e., project expenditure within the surrounding area and employment opportunities for residents will negligibly contribute to the Fezile Dabi District Municipality's economy. As a result, the proposed project is in alignment with the objectives of the district municipality.

4.3.3 Ngwathe Local Municipality Reviewed Integrated Development Plan, 2020 - 2021

The Ngwathe Local Municipality IDP, 2020 - 2021 indicates that the municipality has a 35 % unemployment rate, which is equivalent to 19 643 residents. The IDP further indicates that approximately 1 835 households within the municipal area do not have access to electricity. The construction and operation of the Scafell Cluster Project with a generation capacity of up to 525 MW_{ac} will add much needed capacity to the grid and positively contribute towards the electrification of households without electricity within the municipal area. Although negligible, the employment opportunities associated with the construction and operation phases of the proposed project will contribute towards the stimulation of the local economy through the creation of employment and business opportunities for unemployment residents within the municipal area. Taking into consideration the need for electricity within the municipality and the high unemployment rate, the implementation of the Scafell Cluster Project will enable the municipality in realising some of its key objectives as outlined in the IDP. As a result, the project is considered to be in alignment with the IDP of the Ngwathe Local Municipality.

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4.3.4 Site Suitability

The identification and selection of the site as a suitable area for the development of the proposed grid connection infrastructure was based on the availability of a grid connection point (i.e., the ESKOM Scafell Main Transmission Substation (MTS)) in order to connect the proposed solar PV facilities to the grid. In addition, the topography, extent of land available for the development and the surrounding land uses play a role in the site selection for the development of grid connection infrastructure. From a technical perspective, the study area identified for the development of the solar PV facilities and the grid connection infrastructure is considered to be feasible for development. The site-specific characteristics for the study area that support the development of grid connection infrastructure are described below:

i. Extent of the area available for development

For the development of the Damlaagte Solar PV Facility Grid Connection to facilitate the grid connection between the Damlaagte Solar PV Facility and the ESKOM Scafell MTS, access to sufficient land between the footprint of the solar PV facility and the ESKOM Scafell MTS is required. The properties traversed by the grid connection corridor provide sufficient space for the optimal placement of grid connection infrastructure within which the infrastructure can be developed. The two grid connection corridor alternatives considered and assessed in this BAR for the proposed project are located outside of the urban edge of the towns Sasolburg and Parys. The land use within which the grid connection corridors are located is primarily agriculture, i.e., grazing of cattle. The properties affected by the grid connection corridors have not been considered for an alternative land use, i.e., crop production or urban development, etc. Furthermore, the grid connection corridors do not infringe on areas earmarked for mining development, i.e., there is no conflict of surface rights.

ii. Access to a grid connection point

The ESKOM Scafell MTS has been identified by Mainstream as the nearest grid connection point to be utilised to connect the solar PV facilities into the grid. The substation has a capacity of up to 132 / 275 kV and following discussions between Mainstream and ESKOM, the substation has sufficient capacity to support the grid connection from the solar PV facilities of the Scafell Cluster Project. Furthermore, it is understood that upgrades in the form of new transformers and other components will be made to the ESKOM Scafell MTS in order to accommodate the Scafell Cluster Projects.

iii. Terrain

The study area is associated with a flat topography, with an average slope of 3.2 % and is approximately at an elevation of 1 400 m above sea level. The topography of a study area is critical as it informs the nature and depth of foundations required for the placement of pylons for the transmission line. This has implications for the overall project cost for the grid connection infrastructure. However, as the study area is generally flat, this terrain provides suitable conditions for the optimal placement of grid connection infrastructure.



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iv. Environmental Sensitivities

For the proposed project, two alternative grid connection corridors¹⁷ have been identified and being assessed through this BA process. Through the assessment of a 150 m wide and up to 2.5 km long grid connection corridor that is wider than the transmission line servitude (up to 31 m), Mainstream is thus able to avoid sensitive environmental features present and optimally place the grid connection infrastructure in the area. The assessment of a wider grid connection corridor is in line with the mitigation hierarchy – avoid, minimise, and mitigate. Thus, the application of the mitigation strategy to the proposed project will result in the optimal placement of grid connection infrastructure within the preferred grid connection corridor.

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Grid Connection Corridor Alternative 2: This corridor is 150 m wide and is also approximately 2.5 km in length. This proposed grid connection starts at the on-site substation (Switching Station) of the proposed Damlaagte Solar PV Facility located on Damlaagte RE/229 and extends for about 0.6 km in an easterly direction across Willow Grange 3/246, then turns about 90° southwest for 0.7 km and then southeast for 0.9 km onto Procedeerfontein 5/100, and then turns northeast for 0.2 km before terminating at the Scafell Eskom MTS located on Scafell RE/448.



¹⁷**Grid Connection Corridor Alternative 1 (Preferred)**: This corridor is 150 m wide and is approximately 2.0 km in length. The proposed grid connection is from the on-site substation (Switching Station) of the proposed Damlaagte Solar Facility located on Damlaagte RE/229 and extends for about 1 km in an easterly direction across Willow Grange 3/246 to before turning about 90° south for 0.6km across Scafell RE/448, then turning slightly southeast for 0.3 km before terminating at the ESKOM Scafell MTS. This is the shortest most direct route to connect to the ESKOM Scafell MTS.

5. PROJECT DESCRIPTION

This chapter provides general project information and presents a description of the project considered by Mainstream.

5.1 GENERAL PROJECT INFORMATION

5.1.1 Applicant Details

Component	Description				
Company Name:	South Africa Mainstream Renewable Power Developments (Pty) Lt				
Address:	4 th Floor Mariendahl House Newlands on Main Corners Main & Campground Roads Claremont 7800				
Responsible person:	Eugene Marais				
Tel:	021 657 4045				
Fax:	073 871 5781				
E-mail:	eugene.marais@mainstreamrp.com				

5.2 LOCATION OF THE PROPOSED PROJECT

The Scafell Cluster Project consists of four separate Solar PV facilities and grid connection infrastructure. The Solar PV facilities will have a total generating capacity of up to 525 MWac. The grid connection infrastructure for each Solar PV facility will comprise of an overhead transmission line and a switching station to facilitate the connection between each solar PV facility and the grid. The grid connection infrastructure will have a capacity of up to 33 / 132 kV and each solar PV facility will be connected to the Scafell MTS. This BAR is for the **Damlaagte Solar PV Facility Grid Connection**. A study area located 19 km west of the town Sasolburg has been identified for the construction and operation of the solar PV facility and grid connection infrastructure (see Figure 5-1). Access to the study area is provided via an unnamed road to the north of the study area, which also routes above the N1 for 4 km in a westerly direction. This unnamed road connects to the Boundary Road at the Vaal Eden intersection. Although the study area falls outside of the REDZs, it is however located within the Central Strategic Transmission Corridor — a node for the development and expansion of large-scale electricity / grid connection infrastructure, i.e., transmission lines and substations, etc.

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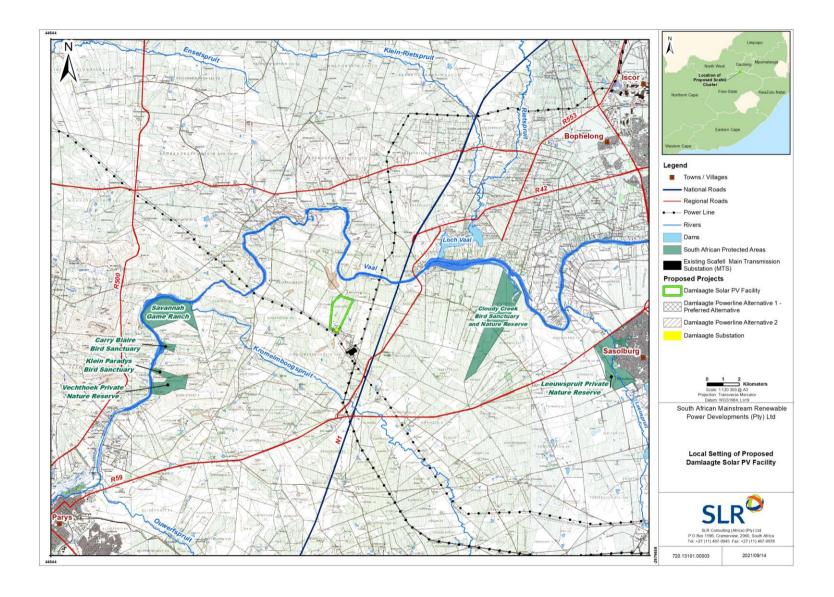


Figure 5-1: Locality Map for the Proposed Grid Connection Infrastructure for the Damlaagte Solar PV Facility



Existing grid connection infrastructure that connect in and out of the ESKOM Scafell MTS within the vicinity of the study area include the following:

Table 5-1: Details of existing grid connection infrastructure within the study area

Name	Capacity (kV)
Scafell Main Transmission Substation	275 / 132
Eiland Rural – Scafell Transmission Lines	132
Scafell - West Wits Transmission Line	132
Scafell - West Wits 2 Transmission Line	132
Bernina - Leeudoring Shaft / Scafell Transmission Line	132
Lochvaal Rural / Scafell Transmission Line	132
Scafell - Tahiti Transmission Line	132
Midland - Scafell 1 Transmission Line	132
Mercury – Zeus 1 Transmission Line	765
Olympus – Scafell 1 Transmission Line	275
Scafell – Snowdown 1 Transmission Line	275
Makalu – Scafell 1 Transmission Line	275

5.3 SUMMARY OF THE PROJECT AND TECHNICAL INFORMATION

Table 5-2 includes technical and project-specific details of the key infrastructure components and support services that will be required to support the operations of the solar PV facility and grid connection infrastructure for a 20-year period. Mainstream has proposed a layout (see Figure 6-1) which has been assessed in this BAR for the construction and operation of the grid connection infrastructure.

Table 5-2: Technical details of the proposed project

Component		Damlaagte Grid Connection			
Property details:	Corridor Alternative 1 (Preferred)	Damlaagte 229 Remaining Extent Willow Grange 246 Portion 3 Scafell 448 Remaining Extent			
	Corridor Alternative 2	Damlaagte 229 Remaining Extent Willow Grange 246 Portion 3 Scafell 448 Remaining Extent Proceederfontein 100 Portion 5			
Grid Connection	Corridor Dimensions	Corridor Alternative 1 (Preferred)	Corridor Alternative 2		
Grid Connection Corridor Width:		150 m wide (and up to 500 m around the switching station footprint)			
Grid Connection Corridor Length:		2 km 2.5 km			
Servitude width	:	Up to 31 m			

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Component	Damlaagte Grid Connection			
Grid Connection Corridor Coordinates	Corridor Alternative 1 (Preferred)	Corridor Alternative 2		
01	26°47'57.10"S 27°37'35.06"E	26°47'57.10"S 27°37'35.06"E		
02	26°48'14.38"S 27°38'16.36"E	26°48'11.87"S 27°38'1.08"E		
03	26°48'33.89"S 27°38'13.50"E	26°48'28.09"S 27°37'47.14"E		
04	26°48'36.83"S 27°38'25.18"E	26°48'46.46"S 27°38'0.76"E		
05	26°48'44.88"S 27°38'29.42"E	26°48'34.10"S 27°38'19.49"E		
06	26°48'55.14"S 27°38'11.01"E	26°48'44.28"S 27°38'29.80"E		
07	26°48'43.36"S 27°38'2.63"E	26°48'54.95"S 27°38'10.21"E		
Switching Station Coordinates	26°48'1.16"S 27°37'40.55"E			
Switching Station capacity:	33 / 132 kV			
Switching Station footprint:	Up to 2.5 ha			
Transmission Line capacity:	Up to 132 kV			
Transmission Line length:	Up to 2 km			
Transmission Line pylons:	Monopole or Lattice pylons, or a co	mbination of both where required		
Power Line pylon height:	Up to 30 m			
Access to transmission line servitude:	A 12 m wide and 5 km long jeep track will be required and constructed during the construction phase of the proposed project. Existing roads and jeep tracks within existing servitudes in the study area will be used as far as possible to gain access to the grid connection corridor during the construction and operation phase of the proposed project.			

5.4 KEY PROJECT COMPONENTS

Renewable energy facilities require grid connection infrastructure, i.e., transmission lines, switching stations, etc in order to transmit the electricity generated from the facility into the grid for consumption by industries, businesses, and households. For the proposed project, the grid connection infrastructure will comprise a double-circuit overhead transmission line with a capacity of up to 132 kV and a switching station with a capacity of up to 33 / 132 KV. The main infrastructure components associated with a typical grid connection project are described in detail below.

5.4.1 Transmission Line

The grid connection will utilise a double-circuit transmission line to facilitate the connection between the Solar PV facility and the grid. The transmission line will have a capacity of up to 132 kV and will be placed within a 31 m wide servitude which will be located within the 150 m wide grid connection corridor that is being assessed in this BA process. Mainstream will either utilise monopole-type, or lattice-type pylons for the transmission line depending on whether the pylons will be placed within a straight section within the grid connection corridor, or at bends and how sharp the bend is. Furthermore, the type of pylon to be used



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depends on the topography and the alignment of the grid connection corridor. In general, monopole-type pylons are used for transmission lines with shorter spans, whereas steel lattice-type pylons are only used where long spans (> 500 m) across valleys and rivers are required. Refer to Figure 5-2 for photographic examples of monopole-type and steel lattice-type pylons.



Figure 5-2: Left: Monopole pylons anchored to the ground with stays / anchors¹⁸. Right: Steel Lattice Pylons on a transmission line¹⁹

5.4.2 Switching Station

The Switching Station will be located within the footprint of the Solar PV facility and will be located adjacent to the on-site substation of the solar PV facility. The Switching Station will have a capacity of up to 33 / 132 kV and will comprise of standard substation electrical equipment, i.e., transformers, busbars, operation and control room, workshop, and storage area. The Switching Station will have a footprint of up to 2.5 ha. Figure 5-3 illustrates a construction site for a Switching Station.

5.4.3 Pylon Foundations

The transmission line pylons will be anchored to the soil through a suitable foundation system. Mainstream will undertake a detailed geotechnical assessment investigate the soil properties of the study area and grid connection corridor prior to the commencement of construction activities in order to determine the suitable foundation system required. When the geotechnical assessment is undertaken a suitable foundation system for the pylons will be determined and designed. Generally, foundations are designed are according to the following classification in Table 5-3 below.

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¹⁸ Source: http://www.hvt.co.za/substation-lines-services/nggallery/page/1

¹⁹ Source: https://suntoy.co.za/tag/ESKOM/



Figure 5-3: A Switching Station under construction²⁰.

Table 5-3: Geotechnical classifications for foundations

Foundation Type	Description
Type 1	Hard engineering strong granular soil
Type 2	Less competent soil, stiff clay, or dense sand
Type 3	Very incompetent soil, i.e., loose sand or soft clay
Type 4	Saturated or submerged soft ground below the seasonal water table
Hard Rock	Solid continuous moderately fractured
Soft Rock	Very fractured, weathered, or decomposed rock

5.4.4 Jeep Tracks / Service Road

A Jeep Track, or Service Road will be created through the movement of vehicles during the construction phase within the grid connection corridor and the 31 m wide servitude to provide access to the various transmission line pylon positions. The road will be below the transmission line and will be used by ESKOM technicians during the operation phase to gain access to the pylons for maintenance purposes. It is anticipated that the jeep tracks required will approximately be 12 m wide and equivalent to the grid preferred connection corridor in length.

5.5 SUPPORT SERVICES

The proposed project will require support services and infrastructure for the duration of the Scafell Cluster Project. Support services and infrastructure required will cater to the solar PV facilities and grid connection

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²⁰ Source: http://www.hvt.co.za/groeipunt-substation/

infrastructure construction projects and will include water, waste and sewage removal, water, and electricity.

5.5.1 Water Demand

During the construction phase of the proposed project, water will be either from a registered service provider, existing boreholes within the study area or through surface water abstraction. The anticipated water usage for the project for the duration of the 12 to 18-month construction phase is included in Table 5-2 above. The water would be required for the following uses:

- Drinking;
- Ablution facilities;
- Access Road construction;
- Dust suppression
- Fire-fighting reserve
- Cleaning of facilities; and
- Construction of foundations for PV panel mounting structures and the grid connection infrastructure,
 i.e., transmission line pylons and switching station, etc.

During the operation phase, negligible water will be required for the operation of the grid connection infrastructure and will mainly be for domestic use within the footprint of the switching station. However, for the solar PV facilities, water during the operation phase will be used for domestic use as well as the cleaning of solar PV panels with each of the solar PV facilities. The anticipated water demand quantities for the Scafell Cluster Project are included in Table 5-2.

5.5.2 Wastewater and Waste Removal

Wastewater: Approximately $16\ 000\ m^3$ per annum of effluent will be generated during the construction and operation phase of the proposed project. A Service Level Agreement will be reached with a registered service provider for the collection of sewage from site using a honey sucker truck and be disposed of at the near Wastewater Treatment Works (WWTWs) during the 12-18-month construction phase. A new clarisfusion system will be deployed during the construction phase of the proposed project which will utilise a chemical process to recycle water from the Operations and Maintenance Buildings. The recycled water will be used for domestic applications within the site, i.e., watering vegetation, etc.

Solid Waste: There will be solid waste generated for the duration of the proposed project and will comprise of hazardous and non-hazardous waste components. During the construction and operation phase of the proposed project, non-hazardous solid waste components will comprise spoil from construction-related activities, general domestic waste (i.e., wooden pallets, cardboards, etc.) and concrete.

Hazardous materials used on site during operations will include fuels, oils, lubricants, cleaning products, and specialised gases (for use in switchgear etc.). Minimal waste is expected to be generated during the operation phase. For certain types or transformers or backup generators, oil that needs to be replaced will be recycled, if possible, or safely stored and removed from the site and correctly disposed of.



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All solid wastes generated (hazardous and non-hazardous) will be disposed of at a licensed landfill site by means of contracting a suitably registered waste handling company. This will be the responsibility of the Engineering Procurement Construction (EPC) Contractor during the construction phase of the proposed project and will have overall oversight to verify that the collection, transport, handling, and disposal of these wastes is being undertaken in a suitable manner.

Waste during the decommissioning phase will be similar to that produced during the construction phase; this includes wooden and plastic packaging, cable off cuts, disused transformers, office, and domestic waste. All solid wastes generated will be disposed of at appropriately licenced landfill sites for general, and/or hazardous waste streams.

5.5.3 Air and Noise Emissions

Air emissions: Temporary air emissions will occur during the construction phase due to the use of construction machinery and the clearing of vegetation which may result in wind-blown dust and fugitive dust emissions. Little to no emissions are anticipated during the operation phase through management of on-site vehicle speed and vegetation and soil landscaping.

Noise emissions: The key temporary noise sources during the construction phase will be from the mobile machinery, vehicles, workers, and plant construction activities including high speed ramming using percussion hammers. Some construction activities may be required afterhours. The operation of the grid connection infrastructure is not expected to generate noise additional to that generated from the existing Scafell MTS located 2 km south of the project site.

5.5.4 Traffic

There will be some traffic during the construction phase of the proposed project for the delivery of project components, machinery, and labour. The transportation route has not yet been finalised but is most likely to be one of the following routes:

- Durban via Harrismith and Vereeniging;
- East London via Bloemfontein and Kroonstad; and
- Cape Town via Beaufort West, Bloemfontein, and Kroonstad.

Transport routes for the proposed project will be finalised once all suppliers are finalised after undergoing a procurement period. Traffic volumes are anticipated to diminish during the construction phase of the proposed project, and only a limited number of vehicles will travel to and from the project site for operation and maintenance purposes. A Traffic Impact Assessment has been undertaken to determine the nature, extent and significance of the traffic impacts associated with the Scafell Cluster Project (see Appendix 8.9). Recommended mitigation and management measures from the TIA for the control and management of traffic-related impacts are included in the EMPrs for the proposed project (see Appendices 7.1 and 7.2).

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5.5.5 Schedule and Life of Project

It is anticipated that a Power Purchase Agreement (PPA) will be signed with ESKOM for a period of up to 20 years. Beyond this duration, the proposed project may continue to operate subject to further approvals or be decommissioned.

5.6 MAIN ACTIVITIES

The proposed project will be carried out in the following phases:

- Development / Planning phase;
- Site preparation;
- Construction phase;
- Operational phase; and
- Decommissioning phase.

Activities to be undertaken during each of the phases are described in the following sections of this BAR.

5.6.1 Development and Planning Phase

During the development and planning phase of the proposed project, Mainstream will assess the key parameters required for the construction and operation of the grid connection infrastructure. This will include:

- Enviro-legal and other permitting (including the undertaking of Search & Rescue operations if required);
- Survey of the grid connection corridor;
- Servitude negotiations with affected landowners;
- Detailed geotechnical investigations of the servitude and switching station footprint area;
- Compilation of a detailed layout of the grid connection infrastructure that meets ESKOM grid connection requirements (including centre line pegging, etc);
- Installation of new access gates within the servitude where required; and
- Foundation nominations for the erection of the pylon and anchors / stays where required.

During the development and planning phase of the proposed project, the project will be adapted in order to meet regulatory requirements, time schedules and expectations of all relevant parties.

5.6.2 Site Preparation Phase

Should the proposed project be granted a positive decision by DFFE and selected as a preferred bidder in a REIPPPP and Financial Close be achieved, site preparation activities will commence. This phase would include the clearance of vegetation, installation of perimeter fencing and levelling of the site and preliminary earthworks. Thereafter the site will be marked out, a construction camp set up and the access road to the site be constructed. The clearance of vegetation is not anticipated to be site wide and will be limited to the transmission line servitude of the transmission line and the footprint of the switching station. The extent of vegetation clearance within the transmission line servitude and the switching station footprint will depend on the outcomes of the detailed layout of the grid connection infrastructure.



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5.6.3 Construction Phase

The construction phase of the proposed project will be initiated following the completion of the site preparation activities. The construction phase will include the following:

- Establishment of a site camp for the temporary storage of construction equipment and machinery;
- Clearance of selected areas within the transmission servitude for the placement of pylon foundations and clearance of the substation footprint;
- Excavation of pylon and anchor / stay and busbar foundations;
- Foundation steelwork (reinforcing);
- Concrete pouring within all foundations;
- Assembly of pylon tower sections on site;
- Erection of pylon tower sections using a 50-ton crane to pick up towers from the ground for final assembly;
- Stringing of the transmission line cables using cable drums placed next to each other within the servitude;
- Sag and tension of the transmission line to ensure minimum clearance heights are achieved;
- Rehabilitation of disturbed areas;
- Testing and commissioning of grid connection infrastructure; and
- Removal of equipment and disassembly of site camp.

Where possible, materials, plant and equipment will be sourced from suppliers within the vicinity of the study area. The bulk of the specialist equipment, i.e., distribution transformers, busbars, circuit breakers, lightening arrestors and air break switches / isolators, etc, will be imported (if no supply is available in South Africa) from China, Europe or the United States of America and be shipped to South Africa.

5.6.4 Operation Phase

The grid connection infrastructure will be operated on a 24 hour, 7 days a week basis – when the solar PV facilities are also operational. The operation of the proposed project will comprise the following activities:

- Maintenance of the grid connection infrastructure; and
- Bush clearing within the power line servitude for safety purposes in line with ESKOM requirements.

5.6.5 Decommissioning Phase

As with the solar PV facility, the grid connection infrastructure is expected to operate for at least 20 years. Once the solar PV facility reaches the end of its life, the facility and the grid connection infrastructure will be decommissioned or continue to operate following the issuance of a new PPA by ESKOM, or by the relevant third party off taker. If decommissioned, all components will be removed, and the site rehabilitated. Where possible all materials will be recycled, otherwise they will be disposed of in accordance with local regulations and international best practice.



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6. ALTERNATIVES

The EIA Regulations 2014 (as amended) through Regulation 2(b) of Appendix 1 ('Basic Assessment Report') requires that alternatives be considered for a BA process for a proposed development. Chapter 1 of the EIA Regulations 2014 (as amended) defines 'alternatives' in relation to a proposed activity / project, 'as a different means of meeting the general purpose and requirements of the activity'. Thus, alternatives may include:

- property on which or location where the activity is proposed to be undertaken;
- type of activity to be undertaken;
- design or layout of the activity;
- technology to be used in the activity; or
- operational aspects of the activity; and
- the option of not implementing the activity.

The alternatives considered for the proposed project are discussed in detail in the following sections of this BAR.

6.1 LOCATION ALTERNATIVES

The intention of the BA process is in part also to identify feasible site / location alternatives for the placement of the proposed project in an environmentally sustainable manner and avoiding sensitive environmental features that may be present within the study area. Thus, Mainstream has identified two alternative grid connection corridors for the placement of grid connection infrastructure for the proposed project (see Figure 6-1). The locations of the alternative grid connection corridors have been informed by the outcomes and findings of the independent specialist studies undertaken for the proposed project as required for an Application for Environmental Authorisation.

The alternative grid connection corridors identified will connect the proposed 150 MW_{ac} Damlaagte Solar PV Facility to the existing ESKOM Scafell MTS in order to establish a grid connection between the substation and the facility for the evacuation of electricity into the grid. The details associated with each alternative corridor are outlined below:

Grid Connection Corridor Alternative 1 (Preferred):

This corridor is 150 m wide and is approximately 2.0 km in length. The proposed grid connection is from the on-site substation (Switching Station) of the proposed Damlaagte Solar Facility located on Damlaagte RE/229 and extends for about 1 km in an easterly direction across Willow Grange 3/246 before turning about 90° south for 0.6 km across Scafell RE/448, then turning slightly southeast for 0.3km before terminating at the ESKOM Scafell MTS. This is the shortest most direct route to connect to the ESKOM Scafell MTS.

Grid Connection Corridor Alternative 2 (Preferred):

This corridor is 150 m wide and is also approximately 2.5 km in length. This proposed grid connection starts at the on-site substation (Switching Station) of the proposed Damlaagte Solar



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Facility located on Damlaagte RE/229 and extends for about 0.6 km in an easterly direction across Willow Grange 3/246, then turns about 90° southwest for 0.7 km and then southeast for 0.9 km onto Procedeerfontein 5/100, and then turns northeast for 0.2 km before terminating at the ESKOM Scafell MTS located on Scafell RE/448.

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Figure 6-1 illustrates the locations of the alternative grid connection corridors that have been considered in this BAR. No alternative locations / sites have been considered or assessed for the placement of the Switching Station for the proposed project. The identified location as illustrated in Figure 5-1 is considered to be optimal from a technical and environmental perspective (as it is not associated with any sensitive environmental features) for the placement of the switching station and associated infrastructure. Thus, no alternative locations for the switching station are considered or assessed in this BAR.

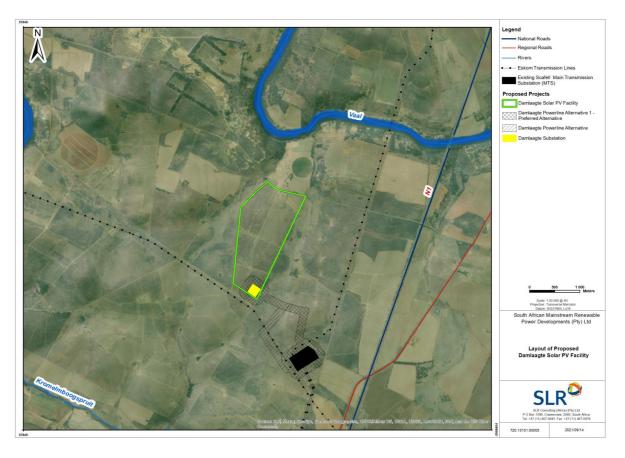


Figure 6-1: A map illustrating the two grid connection corridors being considered and assessed in this BAR for the Damlaagte Solar PV Facility Grid Connection.

6.2 TYPE OF ACTIVITY BEING UNDERTAKEN

No other activity is being considered or assessed for the proposed project. The proposed project will connect the proposed 150 MW_{ac} Damlaagte Solar PV Facility to the grid. As a result, no other activity alternatives could be considered for the proposed project.

6.3 DESIGN OR LAYOUT ALTERNATIVES

The two-grid connection corridor alternatives being considered and assessed within this BA process form part of the design or layout alternatives of the proposed project. The assessment of a 150 m wide grid connection corridor will provide sufficient extent for the placement of grid connection infrastructure whilst avoiding sensitive environmental features present within the study area.

Furthermore, Mainstream will consider the use of either Monopole or Steel-Lattice Pylons for the 132 kV transmission line associated with the proposed project. The types of pylons to be used for the transmission line is dependent on the outcome of the detailed geotechnical and pegging surveys of the grid connection corridor which will be undertaken post the BA process, i.e., after a decision has been issued by the Competent Authority but prior to the commencement of the construction phase. Each of the pylons will be up to 40 m in height, depending on the topography of the study area and will meet the minimum height clearances from the ground as well as from surrounding infrastructure.

The environmental impacts associated with the Monopole and Steel-Lattice Pylons will be similar for the proposed project throughout the project lifecycle. The selection of the preferred design for the pylons will be subject to outcomes from detailed technical studies that will be undertaken post the BA process following the necessary agreements being concluded with ESKOM.

6.4 TECHNOLOGY ALTERNATIVES

No technology alternatives exist to date for the transmission of electricity from renewable energy sources to grid networks. Thus, no technology alternatives will be considered or assessed in this BAR.

6.5 'NO-GO' ALTERNATIVE

Should the 'No-Go' alternative be considered, there would be no impact on the existing environmental baseline and no benefits to the local economy and affected communities. The proposed Damlaagte Solar PV Facility cannot be connected to the grid for the evacuation of electricity. The impacts associated with the consideration of the 'No-Go' alternative for the proposed project are included in Chapter 8 of this BAR.



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7. DESCRIPTION OF THE BASELINE ENVIRONMENT

7.1 CLIMATE

The study area²¹ is associated with summer rainfall, and a cool – temperate climate. Average monthly temperatures are lowest in July (9.46°C) and highest in January (22.07°C). Average monthly rainfall is lowest in July (4.19 mm) and highest in January (116.9 m) (see Figure 7-1). The area is associated with high extremes between maximum summer and minimum winter temperatures, and frequent occurrence of frost.

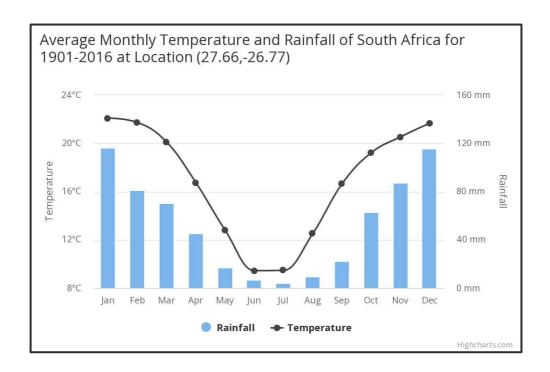


Figure 7-1: Average temperature and rainfall of the project site²²

7.2 BIOPHYSICAL ENVIRONMENT

7.2.1 Topography and Geology

The study area is located approximately $1\,440-1\,490\,m$ above sea level. The area is primarily associated with sedimentary rocks, i.e., shale, sandstone, and mudstone, etc, and belong to the Madzringwe Formation of the Karoo Supergroup. The Karoo Suite dolerites which are a common geological feature in the area are also present. Rocks from the Volksrust Formation of the Karoo Supergroup are located to the south of the study area, and older lithologies of the Witwatersrand, Transvaal and Ventersdorp supergroups are located to the west of the study area towards Parys.

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 $^{^{21}}$ Refers to the surrounding area within which the proposed Scafell Cluster Project is proposed.

²² Refers to the grid connection corridors considered and assessed for the placement of grid connection infrastructure within the study area.

7.2.2 Soils and Land Potential

i. Land Type

The study area predominantly consists of the Ba39 Land Type, except for the north-eastern corner of the site²³ that is Land Type Bb23. Land Type Ba39 represent consist of five terrain units (see Figure 7-2) with approximately 50% of the total land type area consisting of mid-slopes (Terrain unit 3). The mid-slopes have slight slope (2 to 6%) and long slope lengths of 1 000 to 1 500 metres above sea level (masl). The dominant soil form of the mid-slopes is the Hutton form and soil depths range between 0.9 and 1.1 m. The mid-slopes also include soil of the Avalon form that is underlain by soft plinthite at depths of 0.8 to 1.0 m. Approximately 11% of the mid-slopes consist of shallow Mispah soils which are between 0.1 and 0.2 m deep.

The second most prevalent terrain form are crests (Terrain unit 1) that consists of a mixture of rock, shallow topsoil on rock (the Mispah form) and deeper red apedal soils of the Hutton form. Around 10% of the total land type area consists of toe-slopes (Terrain unit 4) consisting of a large variety of soil forms such as the Avalon, Glenrosa, Westleigh, Sterkspruit, Glencoe, Wasbank and Clovelly forms. The valley bottoms (Terrain unit 5) are characterised by soil with higher clay content and stronger structure. Soil forms include hydric soils of the Willowbrook and Rensburg forms as well as soil with a thick vertic horizon (Arcadia form).

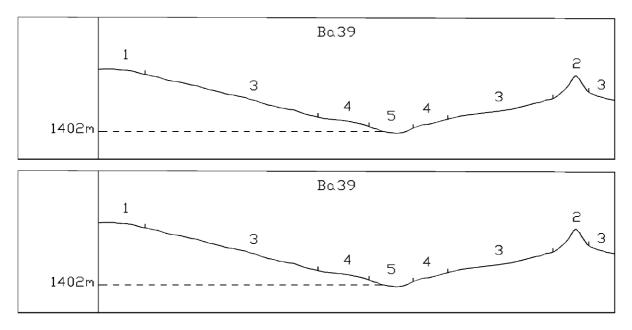


Figure 7-2: Terrain form sketches of Land Types Ba39 and Bb23

Land Type Ba23 consists of four terrain units (see Figure 7-2). The land type represent a flat landscape (at elevations between 1 420 and 1 1435 masl and consists predominantly of mid-slopes (Terrain unit 3) and toe-slopes (Terrain unit 4). These terrain units comprise sandy soils of the Longlands and Wasbank forms, apedal soils of the Hutton and Clovelly forms as well as soils with strong structure such as the Valsrivier and Sterkspruit forms. The valley bottoms consist of hydric soils with a gley horizon i.e., the Rensburg and Katspruit forms.

²³ Refer to the actual footprint of the proposed project. This area will be cleared for the placement of infrastructure associated with the proposed project.



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ii. Soil Properties

Two soil forms with vertic topsoil are present within the study area, i.e., the Rustenburg form (where soil depth is limited by hard rock) and the Rensburg form (associated with the wetland area) where the vertic horizon is underlain by gley. Within the wetland areas present within the study area, the Katspruit form is also present. The southern boundary of the study area consists of shallower soil profiles, including Mispah, Glenrosa, Carolina, Clovelly, Vaalbos and Nkonkoni. The soil depth of these forms is a limiting factor to crop production and these areas are better used as grazing fields for livestock farming.

iii. Land Capability

In terms of the Department of Agriculture, Land Reform and Rural Development (then Department of Agriculture, Forestry and Fisheries) land capability data, the middle, western and northern sections of the site is deemed to have a Moderate (Class 08) land capability (see Figure 7-3). The southern portion of the site as a well as a section of the north-eastern corner are deemed to be of Low-Moderate (Class 07) land capability. In addition, there are small, isolated patches with Moderate-High (Class 09) land capability as well as areas with Low (Class 05) and Low-Moderate (Class 06) land capability.

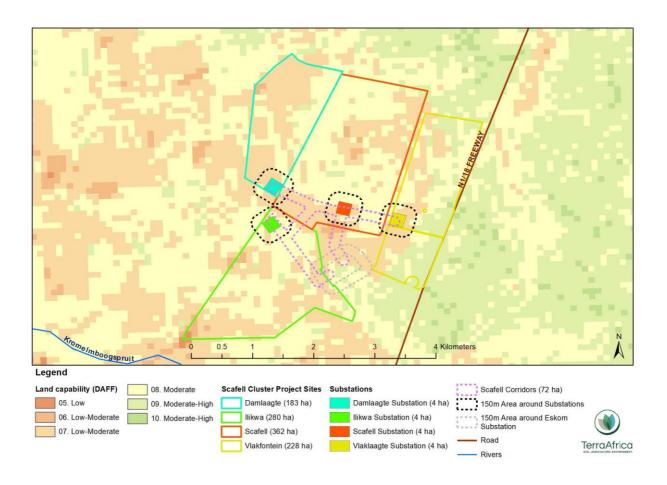


Figure 7-3: Land capability map of the study area (TerraAfrica, 2021)

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iv. Agriculture and Soil sensitivity analysis

According to the newly delineated High Potential Agricultural Areas (HPAA) of the Free State Province, the study area falls within a Category B HPAA. The findings of the Agriculture and Land Capability Impact Assessment indicate that the area identified for the alternative grid connection corridors is largely associated with an area of low and medium sensitivity (see Figure 7-4). A short section of the grid connection corridors that is adjacent to the existing ESKOM Scafell MTS, that has already been disturbed for the placement of other grid connection infrastructure is associated with high sensitivity. The high sensitivity is due to the presence of soil in this area that is suitable for crop production and the recent (within the last six years) cultivation of the land for the establishment of pasture.

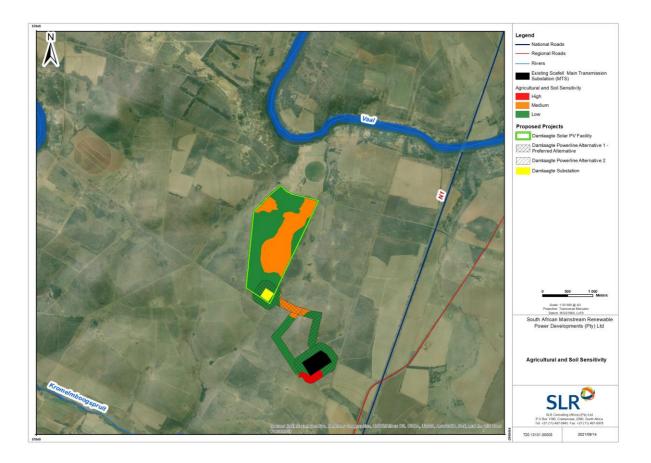


Figure 7-4: Agriculture and Soil sensitivity of the grid connection corridors for the Damlaagte Solar PV Facility Grid Connection.

7.2.3 Biodiversity

7.2.3.1 Flora

According to Mucina and Rutherford (2006) and the 2018 Final Vegetation Map of South Africa, the study area falls within the remaining extent of the Soweto Highveld Grassland Vegetation Type (see Figure 7-5), which is considered to be vulnerable with a conservation target of 24 % and is not protected. The vegetation type has been impacted by anthropogenic activities such as agriculture, mining, and infrastructure development activities. The Soweto Highveld Grassland Vegetation Type is associated with a gently to moderately undulating landscape on the Highveld Plateau and is mainly distributed in the Mpumalanga and

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Gauteng Provinces, and to a lesser extent in the neighbouring Free State and North West provinces. This vegetation type supports short – medium – high, dense, tuffed grasslands that are dominated by *Themeda* trianda with associations to *Elionrus muticus*, *Erasgrostis racemosa*, *Heteropogon contortus* and *Tristachya leuxothrix*. In addition, the study area is located within 10 km of conservation and protected areas identified in terms of the South African Protected Area Database (SAPAD, 2020_Q2) which include, the Carry Blaire Bird Sanctuary and Nature Reserve, Cloudy Creek Bird Sanctuary and Nature Reserve, Klein Paradys Bird Sanctuary, and the Savannah Game Ranch (see Figure 7-9).

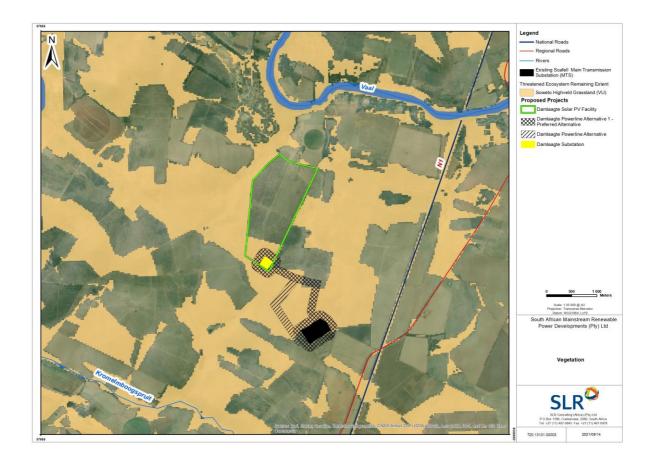


Figure 7-5: The location of the grid connection corridors for the Damlaagte Solar PV Facility Grid Connection in relation to the mapped extent of the Soweto Highveld Grassland.

The findings of the Terrestrial Biodiversity Impact Assessment indicate that the grid connection corridors are associated mainly with three (3) habitat units within the Soweto Highveld Grassland Vegetation Type. These habitats units include the transformed and grassland habitats. The grassland habitat is further subdivided into three (3) habitat subunits, which include the Degraded Grassland, *Seriphium* – dominated Grassland and *Themeda* – rich Grassland subunits. The various types of habitat units and subunits present within the grid connection corridors and are differentiated on the basis of plant species composition. The habitat units are described in detail below.

(i) Transformed Habitat

This habitat unit is present within the grid connection corridors considered for the Damlaagte Solar PV Facility Grid Connection. The field-based survey undertaken by the Specialist indicated that the unit had experienced acute anthropogenic disturbances, which has led to subpar habitat conditions,

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decreased habitat integrity and a low diversity of indigenous species diversity. The low species diversity recorded within the habitat unit is attributed to disturbed and transformed nature of the area. Although indigenous species are poorly species throughout the habitat unit, those present, and indicative of disturbed areas include the *Gomphocarpus fruticosus* and *Plantago lancelota* (see Figure 7-6). As a result of the scarcity of natural vegetation within this habitat unit, invasive alien plant species such as *Verbena bonariensis*, *Datura stramonium*, *Conyza bonariensis* and *Xanthium strumanium* are abundant and make up the majority of the vegetation present throughout this habitat unit. No plant species of conservation concern were observed within this habitat unit, or within the grid connection corridors and does not provide suitable conditions to support plant species listed under the National Forest Act, 1998 (Act No. 84 of 1998).





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Gomphocarpus fruticosus

Conyza bonariensis



Tagetes minuta

Figure 7-6: Photographs of plant species present within the Transformed Habitat unit

(ii) Grassland Habitat

This habitat unit has been identified within the grid connection corridors and is characterised by the dominance of grass species and consists of three (3) subunits, namely Degraded Grassland, *Seriphium* – dominated Grassland and *Themeda* – rich Grassland. Generally, the overall plant species composition of this habitat unit was moderate and characterised mainly by indigenous floral species, with invasive alien plant species present within all the subunits. Only two (2) subunits, the Degraded



Grassland and *Seriphium* – dominated Grassland were identified within the grid connection corridors and are described in detail below.

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(iii) Degraded Grassland

The Degraded Grassland Unit is associated with a low species diversity, which is attributed to the disturbed nature of the study area. Representative graminoid plant species present within this subunit include *Cynodon dactylon*, *Andropogon appendiculatus*, *Hyparrhenia hirta* and *Melinis repens*, whereas representative forb and herb species include *Commilena africana*, *Hilliardiella elaegnoides* and *Gomphorarpus fruticosus*. Although this subunit appeared not to support an established woody layer of vegetation, *Searsia pyroides* and *Vachellia karroo* were infrequently recorded throughout the subunit. Furthermore, alien invasive plant species associated with this subunit include *Verbena bonariensis*, *Verbena brasiliensis*, *Tagetes minuta*, *Conyza bonariensis* and *Campuloclinium macrocephalum*.

(iv) Seriphium-dominated Grassland

This vegetation subunit is described as a *Seriphium* – rich grassland. The subunit supports a moderate species diversity and is associated with a high density of *Seriphium plumosum* in comparison with the other subunits within the Grassland Habitat unit. Based on the findings of Terrestrial Biodiversity Impact Assessment, graminoids dominated plant species within this subunit, and representative graminoid species include *Kyllinga alba*, *Helichrysum chionosphaerum*, *Polygala hottentotta*, and *Hibiscus microcarpus*. Although the woody layer of vegetation of this subunit was poorly represented, *Ziziphus zeyheriana*, *Vachellia karroo* and *Searsia pyroides* were infrequently identified. Furthermore, identified alien invasive plant species within this subunit include *Verbana bonariensis*, *Verbena brasiliensis*, *Conyza bonariensis* and *Campuloclinium macrocephalum*.

7.2.3.2 Listed and Protected Plant Species

No nationally listed (in terms of NEM:BA) or Red Data plant species are located on the project site. However, there were species identified that are listed in terms of the Free State Nature Conservation Ordinance Act, 1969 (Act 8 of 1969), namely: *Aloe davyana, Crinum bulbispermum, Helichrysum chionosphaerum, Helichrysum actuatum* and *Boophane disticha*.

Mainstream will require permits from Free State DESTEA prior to the construction of the proposed project for the translocation or removal of above-mentioned protected plant species located within the project footprints associated with the grid connection corridor. Furthermore, no tree plant species listed in terms of the National Forest Act, 1984 (Act 84 of 1984) were identified within the grid connection corridors of the proposed project.

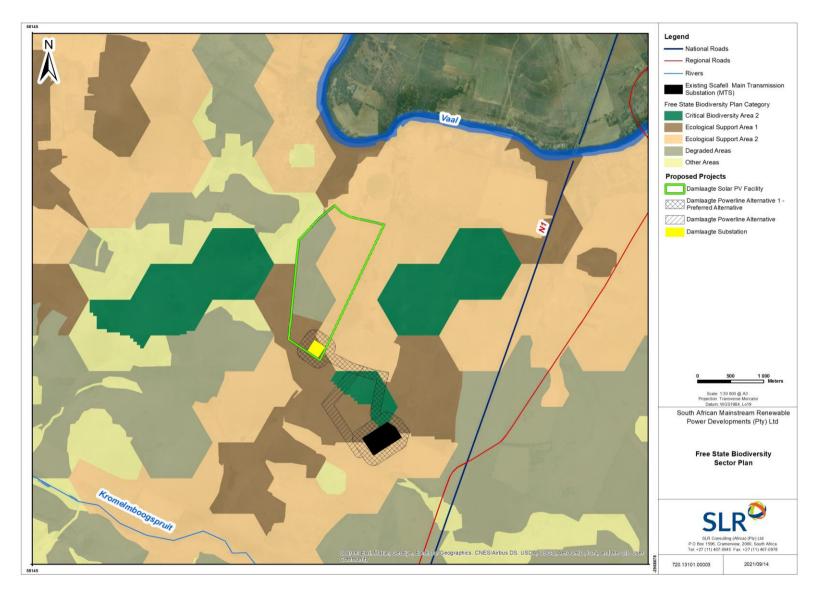


Figure 7-7: CBA Map of the Damlaagte Solar PV Facility Grid Connection



7.2.3.3 Fauna

(i) Habitats

Three vegetation units, namely Transformed, Grassland and Freshwater habitats are identified within the study area. The Transformed Habitat has been acutely impacted by anthropogenic activities – agriculture (cultivation) and infrastructure development. Natural vegetation within this habitat has been replaced by crops and the habitat no longer retains a natural floristic composition. This habitat consists of a low plant species diversity and therefore offers minimal habitat for fauna. The habitat provides no areas of niche habitat for fauna and no varying habitat structure due to the lack of woody plant species. Common fauna species may periodically forage within the project site, but this is likely to be *ad hoc* foraging whilst moving between more suitable areas.

The Grassland Habitat is characterised by grass species and consists of three subunits namely, the Degraded Grassland, *Seriphium*—dominated Grassland, *Themeda* — dominated Grassland and Freshwater Habitat. The Degraded Grassland habitat is fairly small in size and comprises a poor floral species representation and provides limited forage or niche habitat for many faunae, particularly invertebrates. The *Seriphium* — dominated Grassland comprises the largest extent of the overall Grassland Habitat and comprises a moderate floral composition, with a well — developed grass layer providing suitable and valuable habitat for most fauna. This subunit has the potential to host common and fauna species of conservation concern.

(ii) Mammals

Spoors of a Black – backed Jackal, Porcupine, and evidence of burrowing activity of an Aardvark as well as a spoor of a Warthog (mainly on farm roads) were identified within the study area (see Figure 7-8). The Aardvark was the only fauna species of conservation concern identified during the field-based survey in the area. The current land use of the study area, i.e., grazing; constant human presence and disturbance; homogenous nature of the landscape and limited cover provided reduce the suitability of this area as a habitat for most mammal listed and protected species.

(iii) Avifauna

A total of 194 avifauna species could potentially occur within the broader study area, and 62 of these species are classified as priority species. Within the 62 species, only 31 have a medium probability of being present within the study area. 19 species were recorded during the field-based site survey held on 18 January 2021, and no Red Data listed species were identified within the study area. Avifauna with a high and medium probability of occurring within the study area include Common Buzzard, Cloud Cisticola, Western Cattle Egret, Black-headed Heron, Black-winged Kite, Pied Starling, Blacksmith Lapwing, Long-crested Eagle, Spotted Eagle-owl, Amur Falcon, Lesser Kestrel, Marsh Owl and Greater Kestrel. Habitat present within the study area associated with avifauna include medium to tall grassland (including the habitat associated with the wetlands), woodlands and existing grid connection infrastructure. According to the Avifauna Compliance Statement, the study area is associated with a low sensitivity, and there are no avifauna species of conservation concern present. In addition, the study area is not located within an Important Bird Area (IBA) (see Figure 7-9).



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A porcupine quill and a spoor of a black-backed Jackal





Evidence of Aardvark burrowing activity

A warthog spoor

Figure 7-8: Evidence of fauna present within the study area

(iv) Herpetofauna

Herpetofauna species diversity within the study area is low as reptiles and amphibians are difficult to detect, owing to their secretive nature. A juvenile African Bullfrog was observed outside of the alternative grid connection corridors for the proposed project. The freshwater habitat associated with the unchanneled valley bottom wetland within the broader study area provides a suitable habitat for herpetofauna species within the area. A single snake was noted within the clutches of a Black – chested Snake Eagle. The presence of this raptor suggests a greater abundance of reptile species, particularly snakes within the area. Few amphibian species are anticipated to occur within the grassland habitat as a result of the lack of surface water sources or areas of increased soil moisture which are needed to maintain the respiration of amphibians. However, these locations serve as significant foraging habitats. The African Bullfrog is the only listed and protected amphibian species identified within the study area. Furthermore, it is envisaged that the Common Girdled Lizard, a reptile species of conservation concern may inhabit the study area. However, the lack of a rocky habitat within the study area does not provide for the persistence of these species.

(v) Invertebrates

Invertebrate diversity within the study area is considered intermediate. The Freshwater and Themeda - dominated Grassland habitats are associated with a rich invertebrate diversity within the study area. The small size of invertebrates enables them to inhabit small areas and form niche habitats at different scales. Invertebrates' species identified during the field-based survey are associated with broad habitat requirements and mainly belong to the orders Coleoptera, Hemiptera and Orthoptera. No invertebrate species of conservation concern were identified within the study area or within the grid connection corridors for the proposed project, and only the Golden Starburst Baboon Spider is anticipated to occur in the area.

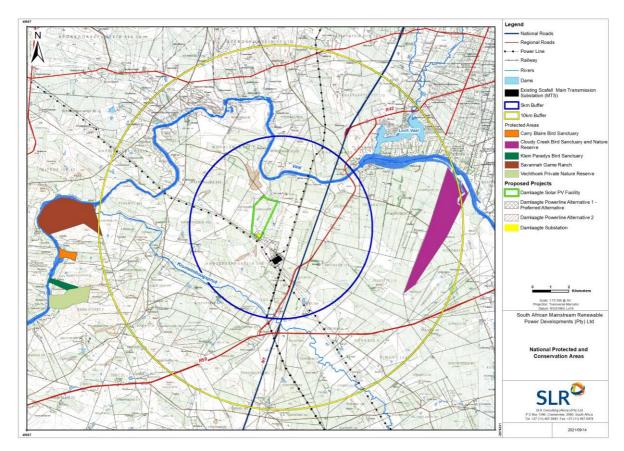


Figure 7-9: Protected areas located within the vicinity of the proposed project.

7.2.4 Freshwater Features

The study area is located within the Vaal Catchment and the Upper Vaal Water Management Area. According to the National Freshwater Ecosystem Priority Areas (NFEPA) database, there is one artificial channelled valley bottom wetland situated towards the south – west of the study area; two artificial channelled valley bottom wetlands to the west and north of the study area; and one depression wetland to the south of the study area. No freshwater features are located within the footprint of the grid connection corridors for the proposed project. The three artificial channelled valley bottom wetlands are considered to be in a severely degraded ecological condition (Class Z3) whereas the depression wetland is associated with a moderately modified ecological condition (Class C). The wetland vegetation within the study area falls within the Mesic Highveld Grassland Group 3 Wetland Type and is considered Least Threatened (Mbona *et al.*, 2015). In addition, the NFEPA database identifies the Kromelmboogspruit River located approximately

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400 m south of the broader study area, and outside of the footprint of the grid connection corridors for the proposed project. The Kromelmboogspruit River is associated with a largely modified ecological condition (Class D) and is not classified as a river Freshwater Ecosystem Priority Area (FEPA). From the findings of the Aquatic Impact Assessment, there are no freshwater features present within the grid connection corridors (see Figure 7-10).

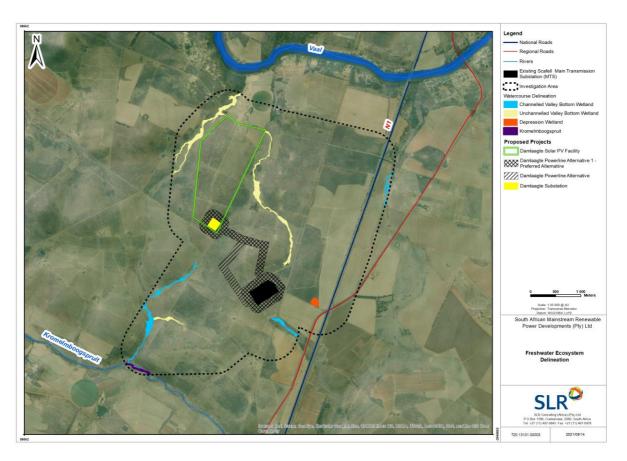


Figure 7-10: Freshwater resources present within the vicinity of the grid connection corridors of the Damlaagte Solar PV Facility Grid Connection.

7.3 SOCIO-ECONOMIC PROFILE

7.3.1 District Municipality

The proposed project falls within the Fezile Dabi District Municipality (FDDM) in the Free State Province. The FDDM is a Category C²⁴ municipality, established in 2000 and is located in the northern most portion of the Free State Province. The district municipality is 20 829.1 km² in extent, and is the smallest district municipality in the province, making up 16 % of the province's geographical area. The main attraction within the district is the Vredefort Dome –the third largest meteorite site in the world and is located 26 km south -west of the project site for the proposed project. The FDDM comprises four (4) local municipalities namely: Moqhaka, Metsimaholo, Ngwathe and Mafube.

The proposed project is located within Ward 7 of the Ngwathe Local Municipality (NLM). The NLM is located on the most northern part of the FDDM, and the Vaal River forms the northern boundary of the municipal

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²⁴ Municipalities for wider areas, outside cities.

area, which also forms the boundary between the Free State, North West, and Gauteng provinces. The municipal area comprises 7 055 km² which is equivalent to 33.87 % of the FDDMs geographical area. Major towns present within the NLM include, Parys, Vredefort, Heilbron, Koppiesand and Edenville.

7.3.2 Population and Household Sizes

According to the Community Survey 2016, the population of South Africa is approximately 55,7 million and has shown an increase of about 7.5% since 2011. In 2016 the country had approximately 16,9 million households, representing an increase of about 17.12% since 2011. The household density for the country is estimated on approximately 3.29 people per household, indicating an average household size of 3-4 people (leaning towards 3) for most households, which is down from the 2011 average household size of 3.58 people per household. Smaller household sizes are in general associated with higher levels of urbanisation.

The greatest increase in population since 2011 has been in the Metsimaholo LM (Table 7-1), higher than both the national average and the averages for Gauteng and the Free State Province. The Ngwathe LM showed a slight decrease in population. Population density refers to the number of people per square kilometre and the population.

Table 7-1: Population density and growth estimates²⁵

Area	Size in km²	Population 2011	Population 2016	Population density 2011	Population density 2016	Growth in population (%)
Free State Province	129,825	2,745,590	2,834,714	2,834,714 21.15 21.83		3.25
Fezile Dabi DM	20,668	488,036	494,777	23.61	23.94	1.38
Ngwathe LM	7,055	120,520	118,907	17.08	16.85	-1.34
Metsimaholo LM	1,717	149,108	163,564	86.84	95.26	9.69
Gauteng Province	18,178	12,272,263	13,399,724	675.12	737.14	9.19
Sedibeng DM	4,173	916,484	957,528	219.62	229.46	4.48
Emfuleni LM	966	721,663	733,445	747.06	759.26	1.63

The number of households in the study area has increased on all levels (see Table 7-2). The proportionate increases in households were greater than the increases in population on all levels, and greater than the increase in households on a national level, except in the Ngwathe and Emfuleni Local Municipalities where the increase in households were below the national average. The average household size has shown a decrease on all levels, which means there are more households, but with less members.

Table 7-2: Household sizes and growth estimates²⁶

Area	Households 2011	Households 2016	Average household size 2011	Average household size 2016	Growth in households (%)
Free State Province	823,316	946,639	3.33	2.99	14.98

²⁵ Source: Census 2011, Community Development Survey 2016

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²⁶ Source : Census 2011, Community Development Survey 2016

Area	Households 2011	Households 2016	Average household size 2011	Average household size 2016	Growth in households (%)
Fezile Dabi DM	144,980	172,370	3.37	2.87	18.89
Ngwathe LM	37,102	40,910	3.25	2.91	10.26
Metsimaholo LM	45,757	59,113	3.26	2.77	29.19
Gauteng Province	3,909,022	4,951,137	3.14	2.71	26.66
Sedibeng DM	279,768	330,828	3.28	2.89	18.25
Emfuleni LM	220,135	253,488	3.28	2.89	15.15

The total dependency ratio is used to measure the pressure on the productive population and refer to the proportion of dependents per 100 working-age population. As the ratio increases, there may be an increased burden on the productive part of the population to maintain the upbringing and pensions of the economically dependent. A high dependency ratio can cause serious problems for a country as the largest proportion of a government's expenditure is on health, social grants and education that are most used by the old and young population.

The total dependency ratio is the highest in the Ngwathe LM (see Table 7-3) and the lowest in Ward 14 of the Metsimaholo LM. The same trend applies to the youth, aged and employment dependency ratios. Employed dependency ratio refers to the proportion of people dependent on the people who are employed, and not only those of working age. The dependency ratios suggest that the Ngwathe LM has the highest levels of poverty in the area.

Table 7-3: Dependency ratios²⁷

Area	Total dependency	Youth dependency	Aged dependency	Employed dependency
Free State Province	52.9	44.5	8.4	76.3
Fezile Dabi DM	51.9	42.7	9.2	75.9
Ngwathe LM	60.2	48.2	12.0	78.7
Ward 7	56.2	49.9	6.3	73.0
Metsimaholo LM	44.3	38.0	6.3	70.3
Ward 14	34.8	25.9	8.9	50.0
Gauteng Province	39.0	32.9	6.0	63.6
Sedibeng DM	43.8	36.5	7.4	70.4
Emfuleni LM	43.8	36.8	7.1	71.9
Ward 25	47.4	39.6	7.8	70.3

Poverty is a complex issue that manifests itself in economic, social, and political ways and to define poverty by a unidimensional measure such as income or expenditure would be an oversimplification of the matter. Poor people themselves describe their experience of poverty as multidimensional. The South African Multidimensional Poverty Index (SAMPI) (Statistics South Africa, 2014) assess poverty on the dimensions of health, education, standard of living and economic activity using the indicators child mortality, years of

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²⁷ Source: Census 2011, Community Development Survey 2016

schooling, school attendance, fuel for heating, lighting, and cooking, water access, sanitation, dwelling type, asset ownership and unemployment.

The poverty headcount refers to the proportion of households that can be defined as multi-dimensionally poor by using the SAMPI's poverty cut-offs (Statistics South Africa, 2014). The poverty headcount has increased in the areas located in the Free State since 2011 (see Table 7-4), indicating an increase in the number of multi-dimensionally poor households. In the areas located in Gauteng, the poverty headcount has decreased. The intensity of poverty experienced refers to the average proportion of indicators in which poor households are deprived (Statistics South Africa, 2014). The intensity of poverty has increased slightly in all areas, except the Fezile Dabi District and the Metsimaholo LM where it decreased slightly. The intensity of poverty and the poverty headcount is used to calculate the SAMPI score. A higher score indicates a very poor community that is deprived on many indicators. The SAMPI score has increased in the areas located in the Free State, indicating that households in these areas might be getting poorer, especially in the Ngwathe LM area. In Emfuleni the score has remained more or less the same.

Table 7-4: Poverty and SAMPI scores²⁸

Area	Poverty headcount 2011 (%)	Poverty intensity 2011 (%)	SAMPI 2011	Poverty headcount 2016 (%)	Poverty intensity 2016 (%)	SAMPI 2016
Free State Province	5.5	42.2	0.023	5.5	41.7	0.023
Fezile Dabi DM	4.4	42.2	0.019	4.9	41.9	0.021
Ngwathe LM	4.7	42.2	0.020	5.4	42.5	0.023
Metsimaholo LM	5.1	42.8	0.022	5.8	41.6	0.024
Gauteng Province	4.8	43.8	0.021	4.6	44.1	0.020
Sedibeng DM	3.9	42.5	0.017	3.5	42.9	0.015
Emfuleni LM	3.4	42.3	0.014	3.2	43	0.014

7.3.3 Population composition, age, gender, and home language

On a ward level most of the population belong to the Black population group (see Figure 7-11), except in Ward 14 of the Metsimaholo LM where most people belong to the White population group.

Ward 7 of the Ngwathe LM has the lowest average age while Ward 14 of the Metsimaholo LM has the highest average age (see Table 7-5). Ward 7 consists mostly of farmland, but also include a portion of the Tumahole township in Parys, while Ward 14 includes a portion of the town of Sasolburg but also consists mainly of farmland.

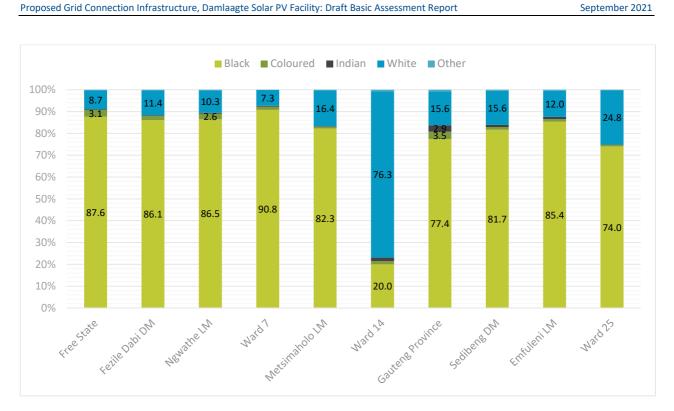
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 $^{^{\}rm 28}$ Source: Census 2011 and Community Development Survey 2016



Population distribution²⁹ (shown in percentages) **Figure 7-11:**

Table 7-5: Average Age

Area	Average Age (in years)
Free State Province	28.38
Fezile Dabi DM	29.22
Ngwathe LM	29.32
Ward 7	26.78
Metsimaholo LM	28.64
Ward 14	34.08
Gauteng Province	29.31
Sedibeng DM	29.58
Emfuleni LM	29.36
Ward 25	29.61

Although the Ngwathe LM has the greatest proportion of people of retirement age, almost a third of the population in Ward 7 is aged 14 years or younger (Figure 7-12). Such a young population holds the potential for a great future demand in terms of employment and other means of making a livelihood, and increased pressure on infrastructure.

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²⁹ Source: Census 2011

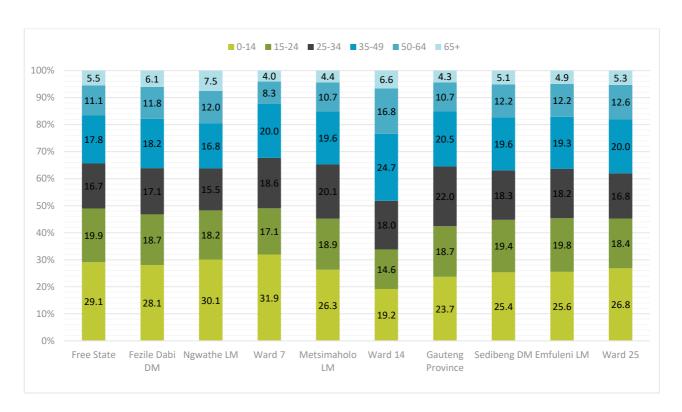


Figure 7-12: Age distribution³⁰

The sex distribution in the area is more or less equal, except in the Ngwathe LM where it is biased towards females (Figure 7-13). This trend is often observed in rural areas where males tend to migrate to urban areas to look for employment or other means of making a livelihood.

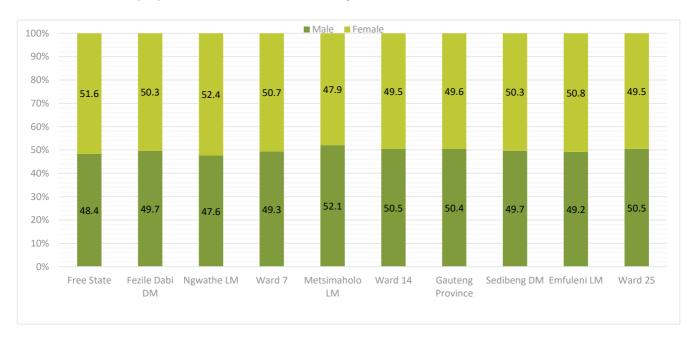


Figure 7-13: Sex distribution³¹

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³⁰ Source: Census 2011

³¹ Source: Census 2011

Sesotho is the home language of most people in the Free State area, except in Ward 14 where Afrikaans is the home language of the majority. The language profiles in the Gauteng area look slightly different, with Sesotho, Afrikaans, IsiZulu and IsiXhosa being the main languages on a district and local level. Home language can indicate the degree of cultural diversity in an area.

7.3.4 Education

A third of the population in Ward 14 of the NLM aged 20 years or older have completed an education higher than Grade 12, whereas Ward 7 has the highest proportion of people who has not completed their primary school education.

7.3.5 Employment, livelihoods, and economic activities

Ward 14 has the highest proportion of people aged between 15 - 65 years that are employed, with more than 80 % of this group being employed in the formal sector. Ward 7 has the largest proportion of discouraged work seekers, indicating a shortage of employment opportunities in the area. More than 45% of the households on district, local and ward level had an annual household income of below R19 601 in 2011, except in the Metsimaholo LM and Ward 14, where the proportion is lower.

Statistics South Africa (2015) has calculated the Food Poverty Line (FPL) for the Free State Province as R334 per capita per month for 2011 where the FPL is the Rand value below which individuals are unable to purchase or consume enough food to supply them with the minimum per-capita-per-day energy requirement for good health. The FPL is one of three poverty lines, the others being the upper bound poverty line (UBPL) and the lower bound poverty line (LBPL). The LBPL and UBPL both include a non-food component. Individuals at the LBPL do not have enough resources to consumer or purchase both adequate food and non-food items and are forced to sacrifice food to obtain essential non-food items, while individuals at the UBPL can purchase both adequate food and non-food items. The LBPL for the Limpopo Province was R520 per capita per month in 2011 and the UBPL R718 per capita per month respectively. The FPL for Gauteng was R339 per capita per month, the LBPL was R523 and the UPL was R963. More recent poverty lines than the rebased poverty lines for 2011 are not available. Based on this, a household with four members needed an annual household income of approximately R17 000 in 2011 to be just above the FPL. When comparing this with the SAMPI data it seems as if there are more households below the poverty lines in the area than who are multi-dimensionally poor. This is due to the poverty lines using a financial measure and do not take into consideration payment in kind and livelihood strategies such as subsistence farming. If these were to be converted into a Rand value, the poverty line picture may have a closer resemblance to the SAMPI data.

7.3.6 Housing

Most households live in urban areas, except in Ward 7 of the Ngwathe LM and Ward 25 of the Emfuleni LM where more than 14% of households live on farms (see Table 7-6). Most households live in areas classified as formal residential, except in Ward 25 of the Emfuleni LM where about a third of households live on smallholdings. More than 75% of households on district or municipal level live in houses or brick structures on separate stands or yards, except in Ward 7 of the Ngwathe LM where approximately a third of households live in informal dwellings that are either in a backyard or informal settlement, whereas Ward 17 of the Metsimaholo LM has the highest incidence of households renting their dwellings. In addition, most

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households own their dwellings or occupy it rent-free, and more than 60 % of households in the area consist of up to three members with larger household sizes present in Ward 14.

Table 7-6: Geotypes

Area	Urban	Tribal/Traditional	Farm
Free State Province	84.5	8.8	6.7
Fezile Dabi DM	92.5	0.0	7.5
Ngwathe LM	90.7	0.0	9.3
Ward 7	85.1	0.0	14.9
Metsimaholo LM	97.7	0.0	2.3
Ward 14	97.9	0.0	2.1
Gauteng Province	97.6	0.9	1.5
Sedibeng DM	96.6	0.0	3.4
Emfuleni LM	99.4	0.0	0.6
Ward 25	85.9	0.0	14.1

7.3.7 Access to basic services

Access to basic services such as water, sanitation and electricity relate to standard of living according to SAMPI (Statistics South Africa, 2014). Households that use paraffin, candles, or nothing for lighting; or fuels such as paraffin, wood, coal, dung or nothing for cooking or heating; have no piped water in the dwelling or on the stand and do not have flush toilets can be described as deprived in terms of these basic services. On a municipal level most, households get their water from a regional or local water scheme. Almost a third of households in Ward 25 of the Emfuleni LM get their water from a borehole. In Ward 7 of the Ngwathe LM, about 12 % of households get their water from a borehole, while almost 6 % get their water from a water tanker. The incidence of households with access to piped water inside their dwellings on a ward level varies. More than 90 % of households in Ward 14 of the Metsimaholo LM have piped water inside the dwelling, compared to just about a third in Ward 7 in the Ngwathe LM.

Access to electricity for lighting purposes give an indication of whether a household has access to electricity, as poor households sometimes only use electricity for lighting, but use other sources of energy for heat and cooking. More than 85 % of households in the area have access to electricity for lighting purposes, with the highest incidence in Ward 14 of the Metsimaholo LM. Candles are the alternative that is most used for lighting purposes. In terms of sanitation, most households in the area have access to a pit toilet with or without ventilation. Ward 7 of the Ngwathe LM has the greatest proportion of households (21.3 %) using a bucket toilet. Furthermore, most households in the area have their refuse removed by a local authority or private company, with the lowest incidences in Ward 7 of the Ngwathe LM and Ward 25 of the Emfuleni LM. A large proportion of households in these two wards either have their own refuse dumps or no rubbish disposal.

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7.4 EXISTING ROAD NETWORK

The FDMM is associated with an expansive road network. Some of the busiest routes within the FDDM and the NLM include the N1 national road and the R59 provincial road. The N1 links Polokwane, Pretoria, Johannesburg, Bloemfontein, and Cape Town. The routes are utilised for the movement of freight and by tourists. Existing roads within the vicinity of the proposed project, that will be used to provide access to the project site of the proposed project include the Boundary Road and the Road S 171 (see Figure 7-14). The Boundary Road is a Class R3 road and forms an intersection with Road S 171 approximately 1 km west of the project site (see Figure 7-14 and Figure 7-15). The Boundary Road also links the R42 and R59 roads within the area. The Road S 171 routes from the intersection with the Boundary Road, over the N1, past the project site to the homesteads located along the banks of the Orange River. The Road S 171 is a Class 4 road and will provide direct access to the project site during the construction and operation phase of the proposed project (see Figure 7-16). The findings of the Traffic Assessment Report indicate that the road network within the vicinity of the project site contains sufficient capacity for the transportation of construction materials and workers during the construction and operation phase of the proposed project. However, the report notes that an upgrade to the Boundary Road and Road S 171 intersection will be required, and that the asphalt surface of the S 171 road will require an upgrade during the construction phase of the proposed project. Further detail regarding the recommendations of the report are included in Chapter 8 of this BAR.

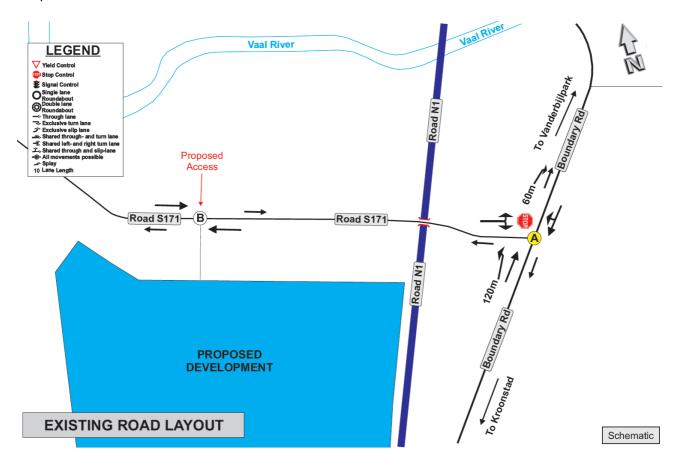


Figure 7-14: Existing road network within the vicinity of the proposed project

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Figure 7-15: A view of the Boundary Road. The road links the R42 and R59 roads within the surrounding area.



Figure 7-16: A view of the Road S 171. The road will provide direct access to the project site of the proposed project.

7.5 VISUAL PROFILE

7.5.1 Landscape Character

The landscape of the study area and the surrounding environment (within a 10 km radius of the study area) is characterised mostly by rolling agricultural land, with low hills occurring in the western and southern western parts (see Figure 7-17 and Figure 7-18). The Vaal River located at least 400 m to the northern

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boundary of the study area is the dominant landscape feature in the area. The only naturally occurring landscape type within the study area is the hills which are covered with Soweto Highland Grassland Vegetation.

The dominant landscape type is agricultural land which is being used mainly for grazing or cultivation. The project site falls within this landscape. In addition, the Vaal River is the primary focus of recreation tourism activities that stretch along its embankments within the surrounding area.

The general land character and overall visual impression of the study area is open land, punctuated bosques of tall trees (mostly exotic) associated with farmsteads. The land slopes gently to the Vaal River system, where a concentration of tall tree is evident (see Figure 7-19). A major drainage line, which flows into the Vaal River drains the southwestern sector of the study area.

7.5.2 Land Use

(i) Residential

Residential land use within the surrounding area is mostly associated with either recreation-type activities along the Vaal River, or homesteads and scattered Agricultural Holdings. A small resort community, Vaal Oewer, is in the far north - western section of the study area immediately north of the Vaal River on a promontory of land, which affords panoramic views over the north - west.

(ii) Agriculture

Agriculture is by far the dominant land use within the surrounding area, with approximately 90 % of the study area utilized for grazing and cultivated lands.

(iii) Industrial and Mining

There are no major industrial areas within the vicinity of the study area. Some sand mining occurs to the south of the Vaal River and mostly north – west of the project site.

(iv) Urban

The major urban centres in the area are Parys (located 20 km south – west of the study area), Sasolburg (19 km east), and Vanderbijlpark (22 km north – east) and are all located outside of the study area.

(v) Infrastructure and Roads

The main roads within the vicinity of the study area include the N1 national road (located immediately to the east of the study area), the R59 that passes through the southern portion of the study area, and the R42 that connects the N1 to Vanderbijlpark in the north – east. Boundary Road passes south and east of the project site for the proposed project and provides direct access to the site. Several other roads that service the farming community within the vicinity of the study area and properties along the banks of the Vaal River crisscross the central parts of the study area. The study area is also traversed by existing transmission lines, that emanate from the Scafell MTS. The substation will be the grid connection point for the proposed project.



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Figure 7-17: Views of the project site from the N1 looking south.

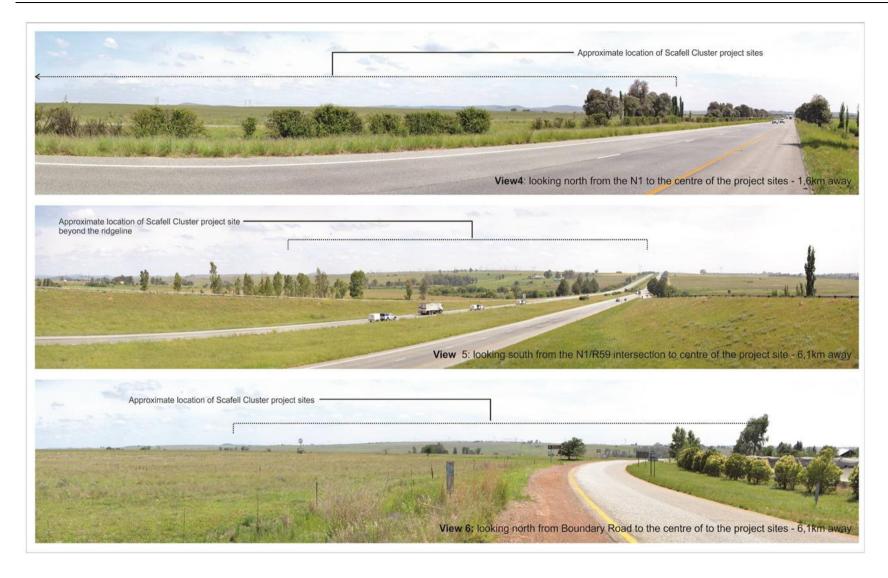


Figure 7-18: Views of the project site looking towards the north from the N1.



Figure 7-19: Views of the project site looking towards the banks of the Vaal River

(vi) Recreation and Tourism

The area is well known for its tourism, primarily associated with the Vaal River. Tourist destinations within a 3 km radius of the surrounding area include Pont de Val Boutique Hotel and Spa, River Lodge Estate, Westvaal Holiday Resort, Kamdebo-on-Vaal, Eden Manor, Bishop's Bay and Club Milos which are all located to the north and east of the project site. To the north – west and along the Vaal River is the resort village of Vaal Oewer, and downstream of it is Vaal – Eden and many B&B – type establishments along the banks of the river.

7.6 HERITAGE RESOURCES

7.6.1 Archaeology

The study area is associated with an archaeological record of Early and Middle Stone Age artefacts and rock engravings which have been recorded from previous studies within the surrounding environment. The archaeological record within the vicinity of the study area from the Iron Age includes Type N and Type V walling located to the south-east of the study area near Heilbron. Based on the outcomes of the Heritage Impact Assessment, the grid connection corridors for the proposed project contain little to no heritage resources. The lack of heritage resources is attributed to the undertaking of extensive agricultural activities within the project site which could have led to an impact on the surface evidence of heritage resources if they ever existed within the project site. As a result, no heritage resources were identified by the within the grid connection corridors for the proposed project.

7.6.2 Palaeontology

The study area is associated with rocks of the Karoo Supergroup – well known for being a host of fossils as well as coal deposits. According to the SAHRIS Palaeosensitivity Map (see Figure 7-20), the study area is associated with a low to moderate sensitivity. Given that there are no paleochannels or rivers present within the study area and there is a well-documented history within the surrounding area of historical mining activities, the possibility of locating fossils within the study area is low.



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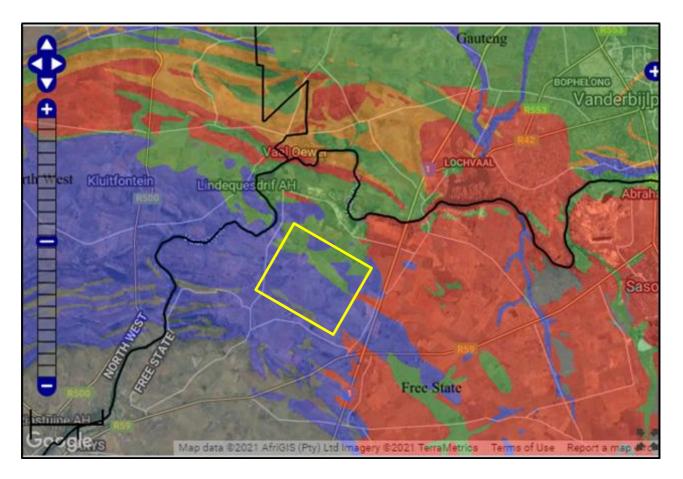


Figure 7-20: Palaeosensitivity Map of the study area.

8. IMPACT DESCRIPTION AND ASSESSMENT

8.1 INTRODUCTION

This chapter describes and assesses the significance of potential impacts related to the proposed Damlaagte Solar PV Facility Grid Connection which comprises a Switching Station and transmission line of up to 132 kV. The methodology used to determine the significance of potential impacts is presented in Appendix 4. Mitigation measures to avoid, reduce, remediate, or compensate for potential impacts are provided, as are optimisation measures to enhance the potential benefits. The impacts that remain following mitigation are assessed and presented as residual impacts. The status of all impacts should be considered to be negative unless otherwise indicated.

The following specialist input was obtained in the assessment of potential impacts:

- Terrestrial Ecology Assessment;
- Aquatic Assessment;
- Agriculture and Land Capability Assessment;
- Heritage Assessment;
- Visual Assessment;
- Social Assessment; and
- Traffic Assessment.

The assessment of impacts is structured as follows:

- Section 8.28.2: Ecological Impacts;
- Section 8.3: Avifauna Impacts;
- Section 8.4: Freshwater Impacts;
- Section 8.6.: Impacts on Soils and associated Agriculture Potential
- Section 8.7.1: Heritage Impacts
- Section 8.7.2: Palaeontology Impacts;
- Section 8.7.3: Visual Impacts;
- Section 8.7.4: Social Impacts; and
- Section 8.9: No-Go alternative.



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8.2 ECOLOGICAL IMPACTS

8.2.1 Impacts on Vegetation

8.2.1.1 Description of Impact

The construction of the Switching Station and the Transmission Line would result in the removal of vegetation within the development footprint of the proposed project infrastructure. The exposure of soils through vegetation clearance may increase the risk of erosion (by wind and water) and loss of topsoil, which may further impact the surrounding vegetation. During decommissioning, similar impacts would be expected to those during construction, albeit likely of lower intensity.

During the operational phase, maintenance activities for the site, servitudes and firebreaks would result in disturbance of vegetation.

8.2.1.2 Impact Assessment

The following direct and indirect impacts associated with the proposed project relating to the anticipated impacts on vegetation were identified by the specialist in the Terrestrial Ecology Assessment:

- Impact on floral habitat and diversity;
- Impact on floral species of conservation concern; and
- Impact on CBAs, ESAs, Threatened Vegetation and Protected Areas.

With regards to the impact on floral habitat and diversity, the specialist assessed all aspects on floral ecology deemed likely to be affected by the proposed project. The construction of the Switching Station (including associated components) and foundations for the transmission line pylons would require the clearance of vegetation, which in turn would lead to total loss of habitat and diversity within the affected areas.

Based on the specialist field work, the proposed project will result in the loss of floral habitat and floral communities associated with the *Themeda* and *Seriphium*-dominated grassland habitat subunits. The *Themeda*-dominated grassland is considered to be of moderately high sensitivity, whereas the *Seriphium*-dominated grassland is considered to be of intermediate sensitivity.

With respect to floral species of conservation concern, individuals of the provincially protected *Aloe dayvana* (rated as 'Least Concern') were identified within the grid connection corridor alternatives. Furthermore, other provincially protected plant species were identified within the surrounding habitat, namely: *Crinum bulbispermum* (Least Concern), *Helichrysum chionosphaerum* (Least Concern), *Helichrysum actuatum* (Least Concern) and *Boophone disticha* (Least Concern). Thus, the presence of these species within the grid connection corridor alternatives cannot be excluded. The above-mentioned protected plant species were found to be mainly associated with the *Seriphium* and *Themeda*-dominated grassland habitat subunits.

In terms of the impact on CBAs, ESAs, Threatened Vegetation and Protected Areas, portions of the proposed project fall within the mapped extent of the Soweto Highveld Grassland vegetation type (see Figure 7.5) which is classified as a vulnerable ecosystem. However, the specialist noted that the *Seriphium*-dominated grassland subunit (which covers the entire extent of the switching station footprint), is not considered to be representative of this ecosystem. Nevertheless, according to the 2015 Free State Biodiversity Plan, much

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of the grassland habitat unit, particularly the *Seriphium*-dominated habitat subunit is associated with ESA 1 and ESA 2 areas; whereas the *Themeda*-dominated habitat subunit is associated with CBA 2 areas within the study area. Thus, the proposed project will have a negative impact on these mapped CBA and ESA areas.

It is estimated that the proposed project would result in the loss of approximately 3 ha of vegetation. Taken collectively, the overall impact of vegetation within the development footprint is considered to be permanent, localised and of medium to low intensity. Thus, the impact is considered to be of **medium** significance without mitigation (see Table 8-1). This assessment takes into cognisance of the fact that the actual location of the grid connection infrastructure is indicative and could change slightly during the detailed design phase. With the implementation of mitigation, the intensity of the impact would be reduced, thus the overall significance of impacts would be **LOW**.

Following the completion of construction, the vegetation within all disturbed areas located outside of project infrastructure footprints would be able to recover over time. However, during operations, some degree of management of vegetation located within the servitudes of the transmission line would be required to keep vegetation low and prevent tree regrowth under the transmission line. The potential operational impacts on terrestrial vegetation are considered of local extent, long-term duration and of low intensity resulting in an overall significance of **LOW** (with and without mitigation).

8.2.1.3 Comparative Assessment of the Grid Connection Corridor Alternatives

- Alternative 1: This alternative is 150 m wide (and up to 500 m wide around the footprint of the Switching Station), and up to 2 km in length. This alternative falls within the Seriphium and Themedadominated grassland habitat subunits within the project site. Two individuals of the provincially protected Aloe dayvana fall within this grid connection corridor alternative. Although this alternative traverse a mapped CBA 2 area (around the footprint of the existing ESKOM Scafell MTS), it is shorter in length compared to Alternative 2. Furthermore, it is pointed out that the entire extent of the 31 m wide servitude will not be cleared of vegetation for development, only the areas identified for the placement of foundations for the pylons (following the survey of the transmission line as well as geotechnical studies within the servitude) would be cleared of vegetation.
- Alternative 2: This alternative is 150 m wide (and up to 500 m wide around the footprint of the Switching Station), and up to 2.5 km in length. As with Alternative 1, two individuals of the provincially protected Aloe dayvana fall within this grid connection corridor alternative. However, this corridor avoids the mapped CBA 2 area around the footprint of the existing ESKOM Scafell MTS.

Given that the overall impact for both alternatives is considered to have the same significance with mitigation (i.e., **LOW** with the implementation of mitigation), Alternative 1 has a shorter length and will result in a smaller footprint being impact within the project site. Thus, from a vegetation and technical perspective, Alternative 1 is nominated as a preferred grid connection corridor for development.

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Table 8-1: Impact on Vegetation

Criteria	Without Mitigation	With Mitigation
Const	ruction and Decommissioning Phases	
Intensity	Medium	Low
Extent	Local	Local
Duration	Permanent	Permanent
Probability	Definite	Definite
Consequence	Medium	Low
Confidence	High	High
Significance	Medium	LOW
Operational Phase		
Intensity	Low	Low
Extent	Local	Local
Duration	Long-term	Long-term
Probability	Definite	Definite
Consequence	Low	Low
Confidence	High	High
Significance	Low	LOW
·		
Reversibility	Irreversible	
Loss of resource	High	
Mitigation potential	Low	

8.2.1.4 Mitigation Measures

Design / Planning-related mitigation:

- > Undertake a walkdown survey of the entire extent of the grid connection corridor (including the footprint of the switching station) prior to construction with a suitability qualified botanical specialist to undertake a search and rescue operation of species of conservation concern that can be translocated to a suitable area and all transplantable plant material prior to construction (including bulbs and others deemed transplantable);
- > Ensure that the necessary permits are obtained from the DESTEA or DFFE for the removal or translocation of protected plant species;
- > Ensure that laydown areas along the servitude (where required) are located outside of the demarcated CBA 2 area;
- > Appoint an Environmental Control Officer (ECO) for the duration of the construction phase prior to construction. The ECO must be responsible for enforcing no-go areas, environmental induction for all construction workers and awarding penalty fines for any transgressors; and
- > The ECO in liaison with the Contractor and Developer should compile an Alien and Invasive Plant (AIP) Management Control / Plan prior to construction. The following mitigation should be included in the plan:



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 Manage the spread of AIP species, which may affect remaining natural habitat within surrounding areas. Specific mention in this regard is made to Category 1b and 2 species identified within the development footprint areas (refer to section 2.7.3 of the Terrestrial Ecology Assessment Report);

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- Undertake ongoing alien and invasive plant monitoring and clearing / control throughout
 the construction phase, including a 30 m buffer surrounding the study area, to check for
 AIP proliferation and to prevent spread into surrounding natural areas. Specific mention
 in this regard is made of Category 1b and 2 AIP species (as listed in the NEM:BA Alien
 species lists, 2020), in line with the NEM:BA Alien and Invasive Species Regulations
 (2020); and
- Alien vegetation that is removed must not be allowed to lay on unprotected ground as seeds might disperse upon it. All cleared plant material to be disposed of at a licensed waste facility.

Construction-related mitigation:

- > Restrict vehicles to travel only on designated roadways or existing roads / tracks to limit the ecological footprint of the construction activities;
- > No collection of indigenous floral species must be allowed by construction personnel, especially with regards to floral species of conservation concern (if encountered);
- > Care should be taken during the construction and operation phase of the proposed development to limit edge effects to surrounding natural habitat. This can be achieved by:
 - Demarcating all footprint areas during construction activities;
 - Ensuring no construction rubble or cleared alien invasive species is disposed of outside
 of demarcated areas. Waste disposal containers and bins should be provided during the
 construction phase for all construction rubble and general waste. Vegetation cuttings
 must be carefully collected and disposed of at a separate waste facility; and
 - All soils compacted as a result of construction activities should be ripped and profiled and reseeded.
- > If any spills occur, they should be immediately cleaned up to avoid soil contamination that can hinder floral rehabilitation later down the line. Spill kits should be kept on-site within workshops. In the event of a breakdown, maintenance of vehicles must take place with care, and the recollection of spillage should be practised, preventing the ingress of hydrocarbons into the topsoil;
- No collection of floral species of conservation concern must be allowed by construction personnel;
- > No illicit fires must be allowed during the construction phase of the proposed development;
- > Upon completion of construction activities, it must be ensured that no bare areas remain, and that indigenous species be used to revegetate the disturbed area. Any natural areas beyond the direct footprint, which have been affected by the construction activities must be rehabilitated using indigenous species; and
- All soils compacted because of construction activities falling outside of the project area should be ripped and profiled. Special attention should be paid to alien and invasive control within these areas.



Operation-related mitigation:

> No additional habitat is to be disturbed during the operational phase of the proposed project;

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- > No vehicles are allowed to indiscriminately drive through sensitive habitat and natural areas;
- > No dumping of litter must be allowed on-site;
- Ongoing alien and invasive plant monitoring and clearing / control should take place throughout the operational and maintenance phase, and the project perimeters should be regularly checked for AIP establishment to prevent spread into surrounding natural areas; and
- > Alien vegetation that is removed must not be allowed to lay on unprotected ground as seeds might disperse upon it. All cleared plant material to be disposed of at a licensed waste facility.

8.2.2 Impacts on Terrestrial Fauna

8.2.2.1 Description of Impact

The construction of the proposed project would result in the removal of vegetation within the development footprint of the grid connection infrastructure which will lead to an impact on faunal diversity, habitat as well as on faunal species of conservation concern. During decommissioning, similar impacts would be expected to those during construction, albeit likely of lower intensity.

During the operational phase, maintenance activities for the site, servitudes and firebreaks may result in the disturbance of fauna.

8.2.2.2 Impact Assessment

The specialist noted that the key anticipated impacts on fauna were the impact on faunal habitat and diversity and potential impacts on faunal species of conservation concern.

With regards to the impact on faunal habitat and diversity, the specialist noted that the study area still provides habitat to common faunal species, however, it is unlikely that a diverse assemblage of species will occur here due to the current agricultural practices and large area of degraded grassland habitat within the study area.

From the field work undertaken by the specialist within the study area, there were no faunal species of conservation concern that were observed. However, potential habitat for five species of conservation concern was found within the study area. Habitat for the *Pyxicephalus adspersus* (African Bullfrog) was identified within the Freshwater Habitat that is present within the study area, but outside of the areas affected by the proposed project. The specialist further notes that the *Harpactira hamiltoni* species (Golden Stardust Baboon Spider) may potentially occur within the *Seriphium*-dominated habitat subunit as it provides suitable breeding habitat.

During the construction phase it is expected that the potential impacts on fauna within the project site would be of low intensity, local extent, and short-term duration. Thus, the impact is considered to be of **VERY LOW** significance with and without mitigation (see Table 8-2).

During operations, activities would generally be restricted to maintenance activities within the servitudes of the transmission line resulting in general disturbance of fauna. The potential operational impacts are



considered of local extent, long-term duration and of very low intensity resulting in an overall significance of **VERY LOW** (with and without mitigation).

Table 8-2: Impact on Terrestrial Fauna

Criteria	Without Mitigation	With Mitigation		
	Construction and Decommissioning Phases			
Intensity	Low	Low		
Extent	Local	Local		
Duration	Short-term	Short-term		
Probability	Definite	Definite		
Consequence	Very Low	Very Low		
Confidence	High	High		
Significance	Very Low	VERY LOW		
Operational Phase				
Intensity	Very Low	Very Low		
Extent	Local	Local		
Duration	Long-term	Long-term		
Probability	Possible	Possible		
Consequence	Very Low	Very Low		
Confidence	High	High		
Significance	Very low	VERY LOW		
	•			
Reversibility	Irreversible			
Loss of resource	High			
Mitigation potential	High			

8.2.2.3 Comparative Assessment of the Grid Connection Corridor Alternatives

The impacts on terrestrial fauna are linked to the clearance of vegetation within the preferred grid connection corridor alternative. Thus, the overall impact for both alternatives is considered to have the same significance (with mitigation) as described in Section 8.2.1 above (i.e., **LOW** with the implementation of mitigation).

8.2.2.4 Mitigation Measures

Design / Planning-related mitigation:

> A suitably qualified biodiversity specialist must review the final layout and provide any additional mitigations (if required).

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Construction-related (including decommissioning) mitigation:

> Should any lights be installed, they should face downwards to reduce the abundance of insects attracted to the night lights. This prey source may attract birds to the study area and may increase avian collisions or electrocutions (applicable to the transmission line);

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- > Do not disturb or alter faunal habitat beyond the demarcated project footprint areas;
- > Restrict travel of construction equipment to designated roadways to limit the ecological footprint of the development activities. Additional road construction should be limited to what is absolutely necessary, and the footprint thereof kept to a minimal;
- > No fires are allowed by construction personnel as this will increase the risk of the surrounding veld catching fire and burning down not only the immediate faunal habitat but also that of the larger local areas;
- > Inspect access roads and areas adjacent to the development footprints after heavy rains to detect any signs of erosion. Where found, these areas must be immediately rectified through appropriate erosion control measures;
- > During the site-pegging phase of surface infrastructure, should any faunal species of conservation concern (albeit considered unlikely) be observed, all activities should be halted, and a suitably qualified specialist is to be contacted to advise on the best way forward;
- Should any other faunal species protected under the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) or the Free State Nature Conservation Ordinance (1969) be encountered, a suitably qualified specialist should be consulted. Should it be deemed necessary to move the taxa authorisation to relocate such species must be obtained from the Free State Department of Economic, Small Business Development, Tourism and Environmental Affairs (DESTEA) or the Department of Forestry, Fisheries, and the Environment (DFFE);
- > Edge effect control needs to be implemented to ensure no further degradation and potential loss of faunal habitat outside of the proposed project footprint areas occurs;
- Smaller species such as scorpions and reptiles are likely to be less mobile during the colder periods of the year, as such should any be observed in the footprint sites during clearing and operational activities. They are to be carefully and safely moved to an area of similar habitat outside of the disturbed footprint. Construction personnel are to be educated about these species and the need for their conservation. Smaller scorpion species and harmless reptiles should be carefully relocated by a suitably nominated construction person or staff member. For larger venomous snakes, a suitably trained official or specialist should be contacted regarding the relocation of the species, should it not move off on its own;
- > All rescue and relocation plans for species of conservation concern should be overseen by a suitably qualified specialist;
- Disturbed and cleared areas need to be revegetated with indigenous grass species to help stabilise the soil surface. Where bare soils are left exposed because of construction activities, they should be immediately rehabilitated; and
- > It is recommended that construction activities take place in a phased manner, so as to ensure that as far as possible faunal species can naturally disperse out of the area ahead of sequential construction activities;



Operation-related mitigation:

> All vehicles should be restricted to travelling only on designated roadways to limit the ecological footprint of the development activities;

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- > No hunting / trapping or collecting of any faunal species is allowed; and
- > No fires should be lit outside of designated locations as this will increase the risk of the surrounding veld catching fire and burning down not only the immediate faunal habitat but also that of the larger local areas.
- > Alien vegetation must be removed from the proposed study area during both the construction and operational phases, in line with the NEMBA Alien and Invasive Species Regulations (2016).
- > No collection or persecution of faunal species of conservation concern within the study area is allowed; and
- > Any faunal species of conservation concern that are observed should be logged (with a GPS position) and uploaded to iNaturalist site. Such data can also be used as part of the biodiversity and conservation awareness of the area over the long term.

8.3 IMPACTS ON AVIFAUNA

8.3.1.1 Description of Impact

The construction and decommissioning phases of the proposed project would result in the disturbance of avifauna and potential habitat destruction. During the operational phase the presence of the transmission line poses a risk for physical injury due to collisions or mortality of avifauna from electrocution.

8.3.1.2 Impact Assessment

The following direct and indirect impacts associated with the proposed project relating to the anticipated impacts on avifauna were identified by the specialist:

- Disturbance of avifauna during construction;
- Collisions with the 132 kV overhead transmission line; and
- Electrocution from perching or attempting to perch on the transmission line.

As noted in Section 8.2.1 above, approximately 3 ha of vegetation would be cleared during the construction phase, thus, no impacts on avifauna resulting from habitat transformation for the construction of the transmission line are expected. In addition to direct habitat destruction, disturbance impacts associated with construction activities could also potentially result in breeding failure if the disturbance happens during a critical part of the breeding cycle within the study area. Terrestrial avifauna species and ground nesting raptors such as the Helmeted Guineafowl, Marsh Owl, Northern Black Korhaan, and the Spotted Eagle-Owl are the most likely to be affected by displacement due to disturbance.

During operations, the specialist notes that collisions are the biggest threat posed by transmission lines to birds in Southern Africa (Van Rooyen, 2004). The most affected species are generally bustards, storks, cranes, and various species of waterbirds, and to a lesser extent, vultures (see Table 2 of the specialist compliance statement included in Appendix 8.3 of this BAR). The specialist pointed out that the pylon /



tower design as well as other technical aspects of the transmission line, such as siting, play a significant role in the potential for collision risk.

With respect to electrocution impacts, the specialist indicated that due to the proposed design of the 132 kV line (steel monopole and self-supporting lattice structures) the proposed transmission line should not pose an electrocution threat to any of the bird species which are likely to occur in the study area. For collision impacts, the specialist notes that species susceptible to collisions with the transmission line on site include waterbirds, terrestrial species, and raptors.

During the construction phase it is expected that the potential impacts on avifauna within the project site would be of medium intensity, local extent, and short-term duration. Thus, the impact is considered to be of **LOW** significance with and without mitigation (see Table 8-2).

During operations, the potential impacts are considered of local extent, long-term duration and of high intensity resulting in an overall significance of **HIGH** without mitigation.

During the construction and decommissioning phases, it is expected that the potential impacts on avifauna within the project site would be of medium intensity, local extent, and short-term duration. Thus, the impact is considered to be of **LOW** significance with and without mitigation (see Table 8-3).

During operations, risk of avifaunal collisions on-site (local extent) would persist throughout the life of the project (long-term duration) and be of high intensity, resulting in an overall significance of **high** without mitigation. With the implementation of mitigation, the probability of such impacts reduces, which reduces to the overall significance to **MEDIUM** (see Table 8-3).

Table 8-3: Impact on Avifauna

Criteria	Without Mitigation	With Mitigation		
	Construction and Decommissioning Phases			
Intensity	Medium	Medium		
Extent	Local	Local		
Duration	Short-term	Short-term		
Probability	Probable	Probable		
Consequence	Low	Low		
Confidence	High	High		
Significance	Low	LOW		
Operational Phase				
Intensity	High	High		
Extent	Local	Local		
Duration	Long-term	Long-term		
Probability	Probable	Possible		
Consequence	High	High		
Confidence	High	High		

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Criteria	Without Mitigation	With Mitigation	
Significance	High	MEDIUM	
Reversibility	Irreversible		
Loss of resource	High		
Mitigation potential	High		

8.3.1.3 Comparative Assessment of the Grid Connection Corridor Alternatives

From an avifaunal perspective, no preferred grid connection corridor was determined by the specialist. Both alternatives were deemed acceptable and optimal as the impact, nature of impact and significance from each alternative is identical.

8.3.1.4 Mitigation Measures

Construction (including decommissioning)-related mitigation:

- > Restrict construction activity to the immediate footprint of the infrastructure where possible.
- > Control access to the remainder of the site to prevent unnecessary disturbance of priority avifaunal species.
- > Measures to control noise and dust should be applied according to current best practice in the industry.
- > Maximum use should be made of existing access roads and the construction of new roads should be kept to a minimum.
- > Dismantling activity should be restricted to the immediate footprint of the infrastructure where possible.

Operation-related mitigation:

> The avifaunal specialist must conduct a walk-through prior to implementation to demarcate sections of the transmission line that need to be marked with Eskom approved bird flight diverters. The bird flight diverters should be installed on the full span length on the earthwire (according to ESKOM guidelines - five metres apart). Light and dark colour devices must be alternated to provide contrast against both dark and light backgrounds respectively. These devices must be installed as soon as the conductors are strung.

8.4 FRESHWATER IMPACTS

8.4.1 Description of Impact

Although the proposed project is not located within the vicinity of any freshwater resources, i.e., wetlands, or rivers, etc., the project is located within the 500 m buffer of freshwater resources present within the broader study area.



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8.4.2 Impact Assessment

From the findings of the Freshwater Assessment, no freshwater features or ecosystems were identified within the proposed grid connection corridor alternatives. However, an unchanneled valley bottom wetland was identified approximately 50 m to the west of the Damlaagte PV project site boundary.

The freshwater assessment identified various activities during the project life that could result in indirect impacts on the downstream water features. Such impacts included, modifications of wetland hydrological function, changes to the wetland geomorphological processes (due to erosion, and sedimentation), loss of wetland habitat and ecological integrity and impacts on wetland biota. Due to the freshwater features being located outside the project site, these impacts were deemed to be of low intensity and local extent, for the duration of the respective project phases. The overall significance of these impacts was deemed to be **VERY LOW** (with and without mitigation).

Table 8-4: Impacts on Freshwater Resources

Criteria	Without Mitigation	With Mitigation		
	Construction, Operation and Decommissioning Phases			
Intensity	Low	Low		
Extent	Local	Local		
Duration	Long-term	Long-term		
Probability	Definite	Definite		
Consequence	Low	Low		
Confidence	High	High		
Significance	Low	LOW		
Reversibility	Irreversible			
Loss of resource	High			
Mitigation potential	High			

8.4.3 Comparative Assessment of the Grid Connection Corridor Alternatives

From a freshwater perspective, both grid connection corridor alternatives do not traverse any freshwater features or ecosystems within the project site. The grid connection corridor alternatives are located within the 500 m buffer of the freshwater features identified within the study area by the specialist. As a result, both grid connection corridor alternatives are deemed to be optimal and acceptable from a freshwater perspective.

8.4.4 Mitigation Measures

Design / Planning, Construction and Operation-related mitigation:

> Undertake any construction work located near identified wetlands during the dry, winter months when surface flow is very low within the freshwater ecosystem to avoid runoff of sediment to downgradient freshwater ecosystems;

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> It should be feasible to utilise existing roads to gain access to the construction area. This will limit edge effects, erosion, and sedimentation of the delineated surrounding wetlands during the construction phase;

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- > All footprint areas must remain as small as possible and vegetation clearing to be limited to what is absolutely essential to ensure as much indigenous vegetation is retained;
- > All stockpiles may not be higher than 2 m. Stockpiling of removed materials may only be temporary (may only be stockpiled during the period of construction) and should be disposed of at a registered waste disposal facility;
- All exposed soil, including stockpiles, must be protected for the duration of the construction phase with a suitable geotextile (e.g., Geojute or hessian sheeting) in order to prevent excessive dust generation, erosion, and sedimentation of the receiving freshwater environment;
- All excavated areas must be compacted to natural soil compaction levels to prevent the formation of preferential surface flow paths and subsequent erosion. Conversely, areas compacted as a result of construction activities must be loosened to natural soil compaction levels under the guidance of the ECO;
- Any remaining soil following the completion of backfilling of the pits are to be spread out thinly surrounding the installed pylon (outside the identified features) to aid in the natural reclamation process;
- > During operation of the facility, regular inspection of the area surrounding the surface infrastructure (proposed PV facility and grid connection infrastructure) should occur to monitor the establishment of vegetation, prevent the establishment of alien and invasive vegetation species, and their potential spread into the surrounding freshwater ecosystem;
- > Should alien and invasive plant species be identified, they must be removed and disposed of as per an Alien and Invasive Species Control Plan and the area must be revegetated with suitable indigenous vegetation; and
- > No water may be directly released from the proposed solar PV facility and other surface infrastructure into the receiving freshwater environment. A Stormwater Management Plan for the proposed solar PV facility be consulted in this regard.

8.5 BIOPHYSICAL IMPACTS

8.5.1 Nuisance impacts (air quality and noise)

8.5.1.1 Description of Impact

Construction and decommissioning activities have the potential to create a localised increase in dust and noise levels. These impacts may be a nuisance to local residents.

8.5.1.2 Impact Assessment

Increases in dust and ambient noise levels during construction and decommissioning are expected during the construction phase. Although the intensity of these impacts could be high at times during construction, the overall construction period would be over the short-term. However, the adoption of standard measures



of dust control and reduction of noise levels, as well as the adoption of mitigation measure noted below will reduce to overall significance of the impact to **INSIGNIFICANT** levels.

Table 8-5: Nuisance Impacts (Air Quality and Noise)

Criteria	Without Mitigation	With Mitigation
	Construction and Decommission	ning Phases
Intensity	High	Medium
Extent	Local	Local
Duration	Short-term	Short-term
Probability	Definite	Possible
Consequence	Low	Very Low
Confidence	High	High
Significance	Low	INSIGNIFICANT
Reversibility	Reversible	
Loss of resource	N/A	
Mitigation potential	High	

8.5.1.3 Comparative Assessment of the Grid Connection Corridor Alternatives

No difference in the significance of the potential nuisance impacts is expected for either transmission line corridor.

8.5.1.4 Mitigation Measures

Construction and Decommissioning-related mitigation:

- Adopt suitable measures to manage fugitive dust generated during the construction of the transmission line and switching station. This will include a comprehensive programme of dust management that limits both occupational and community exposure to dust.
- > Adhere to local municipality by-laws regarding the generation of noise and working hours.
- > Residents near the development site should be notified 24 hours prior to any planned activities that will be visible.
- > Mainstream should demarcate construction boundaries and minimise areas of surface disturbance.
- > Construction of new roads should be minimised, and existing roads should be used where possible.

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8.6 IMPACTS ON SOILS AND ASSOCIATED AGRICULTURAL POTENTIAL

8.6.1 Description of Impact

The development of the proposed project will lead to several impacts from a soils and agricultural potential perspective. These impacts are anticipated to occur during the pre-construction, construction (including decommissioning) and the operation phase of the proposed project.

8.6.2 Impact Assessment

From the findings of the Soils and Agriculture Assessment, the project site for the proposed project comprises of six (6) different soils forms which include the Avalon, Clovelly, Glenrosa, Kransfontein, Mispah and Nkonkoni soil forms. The soil textures for the project site are considered to be sandy clay loam and sandy loam. The results from the chemical analysis of soils samples from the project site indicate that the pH of the soils ranges from very strongly acidic to strongly acidic.

The Soils and Agriculture Assessment identified several activities associated with the proposed project that could have an impact on soil resources and lead to an increased risk of soil erosion for the immediate project footprint and the surrounding area.

The overall significance of the impacts identified for the pre-construction and construction phase (including decommissioning) of the proposed project ranges from **MEDIUM** to **VERY LOW** (with mitigation). For the operation phase, the impact (soil chemical pollution) was deemed to be **VERY LOW** (mitigation). Table 8-6 includes a summary of the overall significance of the identified impacts from a soils and agriculture potential perspective.

Table 8-6: Impacts on Soils and Agriculture Potential

Criteria	Without Mitigation	With Mitigation		
	Pre-Construction, Construction and Decommissioning Phases			
Intensity	High	Low		
Extent	Regional	Local		
Duration	Long-term	Long-term		
Probability	Definite	Definite		
Consequence	High	Low		
Confidence	High	High		
Significance	HIGH	MEDIUM		
Reversibility	Irreversible			
Loss of resource	High			
Mitigation potential	High			
Operation Phase				
Intensity	Low	Very Low		
Extent	Regional	Local		
Duration	Long-term	Short-term		

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Criteria	Without Mitigation	With Mitigation	
Probability	Probable	Possible	
Consequence	Medium	Low	
Confidence	High	High	
Significance	MEDIUM	VERY LOW	
Reversibility	Irreversible		
Loss of resource	High		
Mitigation potential	High		

8.6.3 Comparative Assessment of the Grid Connection Corridor Alternatives

From a soils and agriculture potential perspective, the selection of either alternative as the preferred alternative grid connection corridor will not have an influence on the nature and the significance ratings of the impacts identified for the proposed project. Thus, both grid connection corridor alternatives are acceptable for development from a soils and agriculture potential perspective.

8.6.4 Mitigation Measures

Pre-Construction and Construction-related (including decommissioning) mitigation:

- > Vegetation clearance must be restricted to areas where infrastructure is constructed.
- > No materials transported to the project site must be allowed to be dumped in nearby livestock farming areas.
- > Prior arrangements must be made with the landowners to ensure that livestock are moved to areas where they cannot be injured by vehicles traversing the area.
- > Ensure that construction workers do not establish informal settlements on the property or neighbouring properties.
- > No boundary fence must be opened without the landowners' permission.
- > No open fires made by the construction teams are allowable during the construction phase.
- > Land clearance must only be undertaken immediately prior to construction activities and only within the development footprint.
- > Unnecessary land clearance must be avoided.
- > Levelling of soil must be restricted to areas where it is necessary for construction.
- > Any topsoil that remain on the surface after levelling, must be incorporated into areas of disturbance and not allowed to remain as stockpiles on the surface where it will be prone to soil erosion.
- > Restrict earthworks to only that which is essential for the construction phase of the project.
- > Vegetation clearance, site levelling and earthworks must only be undertaken within the development footprint.
- > Level any remaining soil that remained on the surface after site preparation instead of allowing small stockpiles of soil to remain on the surface.
- > Design and implement a Stormwater Management System / Plan where run-off from the access road is expected.
- > Where possible, conduct the site preparation activities outside of the rainy season.



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> Regularly monitor areas where vegetation removal and earthworks took place, for early signs of soil erosion.

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> Vegetation establishment during the construction phase must be monitored to see whether it was successful and provide sufficient coverage for bare soil surface.

Operation-related mitigation:

- > Losses of fuel and lubricants from the oil sumps and steering racks of vehicles and equipment should be contained using a drip tray with plastic sheeting filled with absorbent material;
- Using biodegradable hydraulic fluids, using lined sumps for collection of hydraulic fluids, recovering contaminated soils, and treating them off-site, and securely storing dried waste mud by burying it in a purpose-built containment area;
- > Avoiding waste disposal at the site wherever possible, by segregating, trucking out, and recycling waste at licensed waste disposal / recycling facilities;
- > Containing potentially contaminating fluids and other wastes; and
- > Cleaning up areas of spillage of potentially contaminating liquids and solids.

8.7 SOCIO-ECONOMIC IMPACTS

8.7.1 Impacts on the Heritage and Cultural Environment

8.7.1.1 Description of Impact

The proposed project could have an impact on heritage resources during vegetation clearing and excavations for the proposed project.

8.7.1.2 Impact Assessment

The proposed project will require limited excavations for the placement of foundations for the grid connection infrastructure (e.g., concrete plinth foundations will be required for the mounting of busbars and transformers within the footprint of the switching station, as well as for each pylon / tower for the transmission line). No significant heritage resources were identified within either of the grid connection corridor alternatives, however, it is possible that some heritage resources may exist below ground and be potentially impacted upon by construction activities of the proposed project.

Should any buried heritage resources be impacted upon during the construction phase, these impacts would be of low intensity, local extent, and long-term duration (as the resources may be lost if irreparably damaged). Given the low likelihood that such impacts would take place, the overall impact is deemed to be of **very low** significance without mitigation. However, any effects to subsurface heritage resources can be successfully mitigated by implementing a Chance Find Procedure, thus the potential impact is deemed to be **INSIGNIFCANT** (see Table 8-7).



Table 8-7: Impacts on the Heritage and Cultural Environment

Criteria	Without Mitigation	With Mitigation			
	Construction Phase				
Intensity	Low	Low			
Extent	Local	Local			
Duration	Long-term	Long-term			
Probability	Probable	Improbable			
Consequence	Low	Very Low			
Confidence	High	High			
Significance	Very low	INSIGNIFICANT			
Reversibility	Reversible				
Loss of resource	N/A				
Mitigation potential	High				

8.7.1.3 Comparative Assessment of the Grid Connection Corridor Alternatives

As there were no identified heritage resources within the alternative grid connection corridors, both grid connection corridors are considered optimal and acceptable for development from a heritage perspective.

8.7.1.4 Mitigation Measures

Construction phase mitigation:

- > The possibility of the occurrence of subsurface finds cannot be excluded. Therefore, if during construction any possible finds such as stone tool scatters, artefacts or bone and fossil remains are made, the operations must be stopped, and a qualified archaeologist must be contacted for an assessment of the find and implement the chance find procedure set out below:
 - This procedure applies to the developer's permanent employees, its subsidiaries, contractors and subcontractors, and service providers. The aim of this procedure is to establish monitoring and reporting procedures to ensure compliance with this policy and its associated procedures. Construction crews must be properly inducted to ensure they are fully aware of the procedures regarding chance finds as discussed below:
 - If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the Senior On-Site Manager.
 - It is the responsibility of the Senior On-Site Manager to make an initial assessment of the extent of the find and confirm the extent of the work stoppage in that area.

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 The Senior On-Site Manager will inform the Environmental Control Officer (ECO) of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA.

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8.7.2 Impact on Palaeontological Resources

8.7.2.1 Description of Impact

Impacts to palaeontological resources will occur during the construction phase of the proposed project as construction activities (i.e., excavations for the placement of infrastructure, etc.) may potentially destroy fossils that are below surface within the project footprint area.

8.7.2.2 Impact Assessment

The broader study area is associated with igneous and sedimentary rocks of the Ventersdorp, Witwatersrand and Karoo Supergroups. Although rocks from the Vryheid Formation are present within the project footprint, they are unlikely to contain fossils because the project site is located at the extreme margins of the Karoo sediments and no fossils have been reported to date in this area. Furthermore, the study area has been ploughed previously, thus no fossils are expected on the surface of the project site.

According to the SAHRIS palaeosensitivity mapping (see Figure 7-20), the study area is considered to have a sensitivity ranging from moderate (green, associated with Quaternary alluvium and sands) to low (blue, associated with Ventersdorp and Witwatersrand Supergroups).

Taking the above into consideration, the potential impact on palaeontological resources is deemed to be of low intensity, local extent, and permanent duration (if destroyed) and of **very low** significance. With the implementation of a fossil chance find procedure, the overall impact is deemed to be **INSIGNIFICANT**.

Table 8-8: Potential Impact on Palaeontological Resources

Criteria	Without Mitigation	With Mitigation
	Construction Phase	
Intensity	Low	Low
Extent	Local	Local
Duration	Long-term	Long-term
Probability	Probable	Improbable
Consequence	Low	Very Low
Confidence	High	High
Significance	Very low	INSIGNIFICANT
Reversibility	Reversible	
Loss of resource	N/A	
Mitigation potential	High	

8.7.2.3 Comparative Assessment of the Grid Connection Corridor Alternatives

As noted above, the alternative grid connection corridors are located within area of moderate to low palaeosensitivity. Thus, both of the proposed alternatives are considered acceptable for development from a palaeontological perspective.

8.7.2.4 Mitigation Measures

Construction phase mitigation measures:

- > The following procedure is only required if fossils are seen on the surface and when excavations commence:
 - When excavations begin, the rocks must be given a cursory inspection by the ECO or designated person. Any fossiliferous material (plants, insects, bone, coal) should be put aside in a suitably protected place. This way the project activities will not be interrupted;
 - Photographs of similar fossils must be provided to the Contractor to assist in recognizing the fossil plants, vertebrates, invertebrates or trace fossils in the shales and mudstone. This information will be built into the EMPrs training and awareness plan and procedures.
 - Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.
 - If there is any possible fossil material found by the developer / environmental control officer then the qualified palaeontologist sub-contracted for this project, should visit the site to inspect the selected material and check the dumps where feasible.
 - Fossil plants or vertebrates that are considered to be of good quality or scientific interest by the palaeontologist must be removed, catalogued, and housed in a suitable institution where they can be made available for further study. Before the fossils are removed from the site a SAHRA permit must be obtained. Annual reports must be submitted to SAHRA as required by the relevant permits.
 - If no good fossil material is recovered then no site inspections by the palaeontologist will be necessary. A final report by the palaeontologist must be sent to SAHRA once the project has been completed and only if there are fossils.
 - If no fossils are found and the excavations have finished then no further monitoring is required.

8.7.3 Visual Impact

8.7.3.1 Description of Impact

The proposed development would potentially alter the visual landscape / rural character of the site, which would have a visual impact in the immediate surrounding area and along the N1 national road, Boundary Road, local roads to the north, west and south of the project site, and homesteads that are present within this area.

8.7.3.2 Impact Assessment

The visual specialist has considered a number of elements to assess the potential impact of the proposed project, namely:



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- Sensitive Viewers and Locations: Most of the identified sensitive viewing locations are positioned in a general arc from the north to west to the southern sectors of the study area. Within this general area, people living in or visiting the study area could have open, partially obstructed, and, in many instances along the Vaal River, screened views of the proposed development from varying angles.
- Visibility: The proposed project infrastructure would be located within a landscape type which has a low visual absorption capacity; thus, the facilities would potentially be highly visible to people travelling along the N1 and within a 3 km radius west, south, and east of the site. However, visibility from the Vaal River and its environs would be low, due to the density of large tree species growing along its banks, the relative low aspect of these viewing locations, and the fact that most views from these areas would most likely be focused on the river itself (i.e., the main reason for the development along its banks).
- *Visual exposure:* As distance between the viewer and the object increases, the visual perception of the object reduces exponentially. The three basic areas of concern are:
 - (i) The public roads including the N1 arterial road, the R59 and R42 connector roads, Boundary Road, and local roads generally servicing the farms and tourist facilities throughout the study area;
 - (ii) Tourist facilities associated with the Vaal River; and
 - (iii) Residential (mostly farmsteads) areas surrounding the project site.
- Visual intrusion: Based on the visual simulations undertaken by the specialist it is expected that the proposed project infrastructure could appear in some foreground views and would be considered highly intrusive from sections of the adjacent local roads north and east of the site, and for two farmsteads immediately north and south of the cluster site. Moderate intrusion is anticipated when project components appear in the middle ground of views from the N1 and farmsteads to the south, west, north, and east of the site, Boundary Road, and the two local roads immediately north and south of the cluster site. In all other views, project components would appear in the background and not appear intrusive. A low to insignificant intrusion would be experienced by visitors to the tourist facilities along the Vaal River.

Taking the above collectively, the intensity of visual impact of the proposed project will be high during construction, medium during operations and very low during decommissioning. The significance of this impact is, therefore, assessed to range from **low** during construction and **medium** for the operational phase (without mitigation). With mitigation the significance would be **LOW** for both the construction and operational phases (see Table 8-9). Associated decommissioning impacts are expected to be **VERY LOW** (with or without mitigation).

Table 8-9: Visual Impact

Criteria	Without Mitigation	With Mitigation	
Construction and Operation Phases			
Intensity	High (construction)	High (construction)	
	Medium (operation)	Low (operation)	

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Criteria	Without Mitigation	With Mitigation
Extent	Local	Local
Duration	Short-term (construction) Long-term (operation)	Short-term (construction) Long-term (operation)
Probability	Probable	Probable
Consequence	Low (construction) Medium (operation)	Low
Confidence	High	High
Significance	Low (construction) Medium (operation)	LOW
	Decommissioning Phase	se
Intensity	Very Low	Very Low
Extent	Local	Local
Duration	Short-term	Short-term
Probability	Probable	Probable
Consequence	Very Low	Very Low
Confidence	High	High
Significance	Very Low	Very Low
Reversibility	Reversible	
Loss of resource	High	
Mitigation potential	High	

8.7.3.3 Comparative Assessment of the Grid Connection Corridor Alternatives

From a visual perspective, there would be no difference in the impact of either grid connection corridor alternative.

8.7.3.4 Mitigation Measures

The following mitigation measures are proposed for the management of visual impacts associated with the proposed project:

Design / Planning and Construction-related mitigation:

- > The construction footprint must be kept as small as possible in order to minimise impact on the surrounding environment and the removal of vegetation and soils must be restricted to what is absolutely necessary and should remain within the approved grid connection corridor and servitude.
- > Ensure, wherever possible, natural indigenous vegetation is retained and incorporated into the site rehabilitation.
- All topsoil that occurs within the proposed footprint of an activity must be removed and stockpiled for later use. The construction contract must include the stripping and stockpiling



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of topsoil. Topsoil would be used later during the rehabilitation phase of disturbed areas. The presence of degraded areas and disused construction roads, which are not rehabilitated, will increase the overall visual impact.

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- > Screen or position the construction camp in areas where they would be less visible from human settlements and main roads.
- > Adopt responsible construction practices aimed at strictly containing the construction / establishment activities to specifically demarcated areas.
- > Building or waste material discarded should be undertaken at an authorised location, which should not be within any sensitive areas.
- > Earthworks should be executed in such a way that only the footprint and a small 'construction buffer zone' around the proposed activities are exposed. In all other areas, the naturally occurring vegetation should be retained, especially along the periphery of the sites.
- > All cut and fill slopes (if any) and areas affected by construction work should be progressively top soiled and re-vegetated as soon as possible.
- > Any soil must be exposed for the minimum time possible once cleared of vegetation to avoid prolonged exposure to wind and water erosion and to minimise dust generation.
- Where new vegetation is proposed to be introduced to the site, an ecological approach to rehabilitation, as opposed to a horticultural approach should be adopted. For example, communities of indigenous plants will enhance biodiversity, a desirable outcome for the area. This approach can significantly reduce long-term costs as less maintenance would be required over conventional landscaping methods as well as the introduced landscape being more sustainable.
- > Progressive rehabilitation of all construction areas should be carried out immediately after they have been established.
- > Undertake planting of screening vegetation along the northern boundary of the project site.
- > Ensure the perimeter fence around the site is of a 'see through' variety and that its colour blends with the environment.
- "Housekeeping" procedures should be developed for the project to ensure that the project site and lands adjacent to the project site are kept clean of debris, garbage, graffiti, fugitive trash, or waste generated onsite; procedures should extend to control of "track out" of dirt on vehicles leaving the active construction site and controlling sediment in stormwater runoff.
- > During construction, temporary fences surrounding the material storage yards and laydown areas should be covered with 'shack' cloth (khaki coloured).

Operation-related mitigation:

- > Install light fixtures that provide precisely directed illumination to reduce light "spillage" beyond the immediate surrounds of the site i.e., lights (specifically spotlights) are to be aimed away from the N1 and R59 road and areas south and west of the site.
- > Night lighting of the construction sites should be minimised within requirements of safety and efficiency.
- > Avoid high pole top security lighting along the periphery of the site and use only lights that are activated on illegal entry to the site.
- > Minimise the number of light fixtures to the bare minimum, including security lighting.



8.7.4 Creation of employment and business opportunities

8.7.4.1 Description of Impact

The proposed development would create a number of local employment and business opportunities during construction. In addition, there would be an opportunity for skills development and on-site training.

8.7.4.2 Impact Assessment

The proposed project would create a number of short-term employment opportunities during the construction phase. Indirect and induced impacts would occur because of the new economic development and would include new jobs at businesses that support the expanded workforce or provide project materials, and associated income. These indirect impacts are anticipated to occur locally, through the use of national goods and services including, but not limited to, construction materials and equipment and workforce essentials such as food, clothing, safety equipment, and other goods. Off-site accommodation would also be required for those construction staff not located in the area, and there is a large amount of accommodation available in Sasolburg, Parys, Vereeniging and Vanderbijlpark.

The local area and its activities (businesses and shops, etc.) are expected to be stimulated economically, due to the increased spending expected from the increased salaries and wages paid to employees during construction. Service industries in the region will benefit from this, which in turn will have a knock-on effect on suppliers of goods and services in other areas. This positive impact is likely to be experienced in terms of the increased markets for the sale of local goods to construction staff and direct employment by construction contractors.

With respect to skills transfer, in all likelihood, skills would be transferred in the form of on-the-job training during the construction phase. These skills will enable these individuals to seek other construction and related employment once the construction phase is complete. The construction related work opportunities could also lead to capacity building. Capacity building refers to the conscious increasing of knowledge, networking capability and the skills base.

It is not anticipated that the above-mentioned benefits to the local economy would extend over the operational lifespan of the proposed project.

The creation of employment and business opportunities, as well as skills transfer, during the construction phase is likely to occur over the short-term, be of impact of high intensity, and be of national extent. The significance of this potential impact is, therefore, assessed to be **HIGH** (**positive**) before and after mitigation.

Table 8-10: Creation of Employment and Business Opportunities

Criteria	Without Mitigation	With Mitigation
Construction Phase		
Intensity	High	High
Extent	National	National
Duration	Short-term	Short-term
Probability	Probable	Improbable

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Criteria	Without Mitigation	With Mitigation
Consequence	High	High
Confidence	High	High
Significance	High (positive)	HIGH (positive)
Reversibility	Reversible	
Loss of resource	N/A	
Mitigation potential	High	

8.7.4.3 Comparative Assessment of the Grid Connection Corridor Alternatives

With respect to the creation of employment and business opportunities, there would be no difference in the impact of either grid connection corridor alternative.

8.7.4.4 Mitigation Measures

Construction phase mitigation measures:

- > It is recommended that a local procurement policy be adopted to maximise the benefit to the local economy.
- Mainstream should seek to develop a database of local companies, specifically Broad Based Black Economic Empowerment (BBBEE) companies, which qualify as potential service providers (e.g., construction companies, security etc.) prior to the commencement of the tender process for construction contractors. These companies should be notified of the tender process and invited to bid for project-related work. As many goods and services as possible must be sourced from the local area. Mainstream must engage with local authorities and business organisations to investigate the possibility of procurement of construction materials, goods, and products from local suppliers where feasible.
- Mainstream need to liaise with the Local Economic Development section of the municipality, local leaders, and NGOs about their recruitment policy to ensure it is in line with the local practices and tap into existing knowledge. The recruitment policy must set reasonable targets for the employment of local people and women. Mainstream and the municipality should identify these targets before recruitment commences. The definition of "local" must be clarified with the affected stakeholders. Mainstream must provide the local municipality with a list of skills required before the construction period commences, and the municipality must distribute the list to all stakeholders to allow them to prepare for the opportunities. All labour opportunities must be accessed through a labour desk in town, and no recruitment must be allowed on site. Mainstream must implement mitigation and management measures to ensure that no employee or job applicant is discriminated against based on race, gender, nationality, age, religion, or sexual orientation.
- > Where reasonable and practical, the contractors appointed by the proponent should appoint local contractors and implement a 'locals first' policy, especially for semi and low-skilled job categories. However, due to the low skills levels in the area, many skilled posts are likely to be filled by people from outside the area.



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- > Opportunities for training of workers should be maximised.
- > Ways to enhance local community benefits with a focus on broad based BEE need to be explored.

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- > Local construction companies should be used whenever possible, especially for subcontracting work.
- > Local suppliers should be used as far as possible.
- Labour-based construction methods should be used whenever practically possible. It is important to follow the principles of the Expanded Public Works Programme and apply effective labour-based construction technologies to increase the job creation effects.
- > The use of local labour should be approached in such a manner that large numbers of residents can benefit from this action rather than only a select few.
- > While preference to local employees and companies is recommended, it is recognised that a competitive tender process may not guarantee the employment of local labour for the construction phase.

8.7.5 Impact on safety and security on neighbouring residents

8.7.5.1 Description of Impact

The presence of construction workers on the site could potentially increase the risk of stock theft and poaching in the neighbouring area. The movement of construction workers on and off the site also poses a potential threat to farm infrastructure, such as fences and gates, which may be damaged. Livestock losses may also result from gates being left open and/or fences being damaged.

8.7.5.2 Impact Assessment

From interviews undertaken by the social specialist, local residents have indicated that the project site is a crime hotspot due to its proximity to the N1 national road and the fact that many people do not reside on the properties. An increase in the number of people moving around the area during the construction phase could make it easier for opportunistic criminals to enter the area without being noticed.

It was also noted that stock theft is a significant problem in the area where property fences are cut, and cattle are herded towards the N1. Thus, neighbouring farmers have expressed the concern that the presence of construction workers in the area would result in an increase in stock theft.

During the operational phase there would be no on-site staff associated with the proposed grid-connection infrastructure.

The potential safety and security impacts are considered to extend outside the site boundaries and be of high intensity for the community as a whole for the duration of construction. The significance of this potential impact is, therefore, assessed to be **medium** before the implementation of mitigation. With mitigation the significance of the impact can be reduced to **LOW**.



Table 8-11: Impact on Safety and Security on Neighbouring Residents

Criteria	Without Mitigation	With Mitigation		
Construction Phase				
Intensity	High	Medium		
Extent	Regional	Regional		
Duration	Short-term	Short-term		
Probability	Probable	Probable		
Consequence	High	High		
Confidence	High	High		
Significance	Medium	LOW		
Reversibility	Reversible			
Loss of resource	N/A			
Mitigation potential	High			

8.7.5.3 Comparative Assessment of the Grid Connection Corridor Alternatives

From a social perspective, the technically feasible grid connection corridor alternative is nominated as the preferred corridor for development.

8.7.5.4 Mitigation Measures

Design / Planning-related mitigation:

- Mainstream should work with existing farmers' security groups and farmers' associations to create a farm access protocol for everybody that need to access the properties, and a safety plan. Mainstream should also become a member of these forums. Mainstream should give a roster to the directly affected landowners stating dates and approximate times that contractors will be on the farms. Farmers emphasised that they need to know of people accessing the farm ahead of time. It is too late to inform them when entering the property. All access arrangements should be made at least 24 hours before access is required.
- Mainstream must meet with the landowners before the construction phase commences and formalise security arrangements. The perimeter of the construction site should be appropriately secured to prevent any unauthorised access to the site; the fencing of the site should be erected before construction commences and maintained throughout the construction period. Security lighting should be implemented. No construction workers other than security services should be allowed to stay on the farms. Construction workers must stay in one of the adjacent towns and be transported to work daily. To minimise the risk of petty crime and violent behaviour, proper procedures such as screening prior to hiring should be undertaken, and proper monitoring procedures should be adhered to during this phase.

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- All contractors and employees need to wear photo identification cards. Mainstream and its contractors must develop an induction programme that includes a Code of Conduct for all workers (including sub-contractors). The induction programme must include HIV/AIDS awareness programmes, education on tuberculosis, alcohol, and substance abuse. Any person that does any work on site must sign the Code of Conduct and presented with a copy. The Code of Conduct must include the following aspects:
 - Respect for residents, their customs and property.
 - Respect for farm infrastructure and agricultural activities.
 - O No hunting or un-authorised taking of products or livestock.
 - Zero tolerance of illegal activities by construction personnel including: prostitution; illegal sale or purchase of alcohol; sale, purchase, or consumption of drugs; illegal gambling or fighting.

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- o Compliance with the Traffic Management Plan and all road regulations; and
- Description of disciplinary measures for violation of the Code of Conduct and company rules.

Construction phase mitigation measures:

- Vehicles should be marked as construction vehicles and should have the Mainstream or the contractor's logo clearly exhibited. Entry and exit points of the site should be controlled. Areas where materials are stockpiled must be fenced, or suitably bunded with appropriate barriers. If a security company is used, their schedules should be communicated to the landowners.
- > No unauthorised entry to the site is to be allowed; access control and a method of identification of maintenance personnel must always be required for the duration of the project life cycle.
- Mainstream must also establish a grievance mechanism and appoint a Community Liaison Officer that the community can access easily. The grievance mechanism must be communicated to the affected communities.
- If any damage to farm infrastructure or stock losses occurs, Mainstream must compensate the affected landowner for his losses. Mainstream must develop a grievance mechanism and a complaints procedure that allows the landowners to log their grievance and submit a claim for damages. The construction teams must be educated about the impact of damages to fences, water troughs and gates on the activities of the farmers through toolbox talks. Inspections of boundary fences and gates should be done daily in areas where there are activities.
- > Water use must be negotiated with the farmers and written into their contracts with Mainstream. During a drought water for livestock must be prioritised.
- Mainstream must join the Vaal-Eden Fire Fighters Association and adhere to their rules. They must become active members of the fire fighter's association. Safety at and around the site should be ensured by limiting any fire risks, fencing off the site to avoid unauthorised access and employing security personnel. The security must be provided with adequate firefighting equipment on site and be provided with firefighting training.
- > While it is true that the landowners will lose productive grazing areas, it must be considered that they will be compensated for the use of the land through a commercial transaction with Mainstream. If any long grass or vegetation must be cut for maintenance the farmers must be given the option to utilise the grass for their livestock.



> Mainstream must ensure effective waste management on the site during construction and operation, especially with regards to plastic waste or anything that is poisonous to the livestock. They must ensure that open fires on the site for heating, smoking, or cooking are not allowed except in designated areas.

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Decommissioning-related mitigation:

- > All structures and infrastructure associated with the proposed project should be dismantled and transported off-site on decommissioning.
- > Rehabilitation of the decommissioned site could entail grading, scarifying, seeding, and planting.
- > If workers are found to be in contravention of the Code of Conduct, which they will be required to sign at the beginning of their contract, they will face disciplinary procedures that could result in dismissal. Stock theft should be noted as a dismissible offence.

8.7.6 Impact on traffic

8.7.6.1 Description of Impact

The movement of heavy construction vehicles during the construction phase has the potential to damage roads and create noise and dust. In addition, the movement of construction vehicles may pose safety risks for other road users.

8.7.6.2 Impact Assessment

The following vehicle traffic related activities are expected from the proposed project:

- Delivery of construction materials during the construction phase.
- Transportation of waste materials created due to construction off site to registered waste disposal sites.
- Delivery of consumables during the construction and operational phases.
- Transport of workers to and from the Proposed Development via taxi or private transport during the construction and operational phases.

Based on the capacity calculations undertaken by the specialist, it is expected that the proposed project would have a manageable impact on vehicle traffic during all phases, regardless of whether only one of the proposed sites are constructed and operated at one time or all the proposed sites are constructed and operated at the same time, subject to the implementation of recommended road infrastructure improvements.

The potential impacts on traffic are considered to be local to regional in extent, short-term and of medium intensity. The significance of this potential impact is, therefore, assessed to be **low** before mitigation and **VERY LOW** after mitigation.

Table 8-12: Impact on Traffic

Criteria	Without Mitigation	With Mitigation		
Construction and Operational Phases				
Intensity	Medium	Low		
Extent	Local to Regional	Local to Regional		
Duration	Short-term	Short-term		
Probability	Probable	Probable		
Consequence	Low	Low		
Confidence	High	High		
Significance	Low	VERY LOW		
Reversibility	Reversible			
Loss of resource	N/A			
Mitigation potential	High			

8.7.6.3 Comparative Assessment of the Grid Connection Corridor Alternatives

From a social perspective, the technically feasible grid connection corridor alternative is nominated as the preferred corridor for development.

8.7.6.4 Mitigation Measures

Construction phase mitigation measures:

- > The Community Liaison Forum should be utilised to discuss traffic, dust, noise, and other construction related concerns.
- > Construction-related activities should be limited to workdays (Monday to Friday daylight hours) and the impact on traffic patterns should be mitigated by instating traffic off-peak times.
- > If landowners are currently allowed to use servitude roads to access their properties, they must continue to be allowed to do so.

8.8 CUMULATIVE IMPACTS

As noted in Section 1, the proposed project forms part of the overall proposed Scafell Cluster project which comprises four solar PV facilities and associated grid connections. A separate Environmental Assessment process has been conducted for each of these proposed projects. These photovoltaic power projects proposed by Mainstream, together with any other proposed and existing projects and activities in the area would have a cumulative impact on the biophysical and socio-economic environment. It should be noted that the significance rating after mitigation assumes that all projects would also implement mitigation / optimisation measures.

To contextualise potential cumulative impacts, it is noted that the nearest towns are located over 19 km away and include Parys, Sasolburg, Vereeniging and Vanderbijlpark and that the neighbouring area to the Scafell Cluster is a farming community that reside close to the project sites.

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There are no other solar projects close-by, with the nearest application (a proposed 75 MW Solar PV facility at Lethabo Power Station which was submitted in November 2014) located approximately 30 km east of the proposed Scafell Cluster project. However, there are a number of transmission lines associated with the existing ESKOM Scafell MTS already established adjacent to the proposed sites.

To the north there are sand mining operations located along the Vaal River. The social specialist notes that the most significant impact of the mines reported by community members is on the quality of the road infrastructure and the communities think that most of the mines operate illegally.

Vegetation

Within the surrounding areas, the current greatest threat to the floral ecology that are likely to contribute to cumulative impacts include:

- (i) The continued loss of the vulnerable Soweto Highveld Grassland that could impact on the remaining extent of the vegetation type (seeing as it is not protected) thereby also increasing the threat status of the vegetation type;
- (ii) The continued proliferation of alien invasive plant species, resulting in the overall loss of native floral communities within the local area; and
- (iii) The continued encroachment of Seriphium plumosum into the surrounding habitats.

As the Scafell Cluster is situated within the middle of a large, mapped ESA, the further development of all the associated projects would likely have indirect impacts on the mapped ESA area. The anticipated cumulative impact is considered to be of **LOW** to **MEDIUM** significance with mitigation.

Fauna

As noted by the specialist, the study area is currently subjected to grazing by domestic cattle and cultivation. The increased competition for grazing and the constant human presence reduces faunal abundance and diversity within the broader study area. The proposed establishment of the PV facilities would likely lead to the displacement of faunal species currently inhabiting those proposed footprint areas, pushing them out into the surrounding vegetated areas leading to increased competition for territories and breeding sites. Moreover, there is likely to be a knock-on dispersal affect, leading to increased resource competition and possible increased mortality rates, resulting in a decreased species abundance and diversity and suitable habitat for species of conservation concern. Proliferation of alien vegetation and insufficient rehabilitation will ultimately lead to loss of viable habitat in the surrounding areas, displacing faunal species further as indigenous floral species (faunal habitat and food resources) are displaced and lost. In light of the overall level of anthropogenic activity within the broader area, the overall impact on terrestrial fauna is deemed to be of LOW significance.

Avifauna

In addition to the proposed Scafell Cluster projects, there are a number of existing transmission lines that can potentially impact on avifauna. Furthermore, the establishment of numerous PV panels will create additional reflective surfaces which birds may think are water resources. Qualitatively, the larger spatial extent of reflective surfaces could potentially increase the probability of avifaunal

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collisions with this infrastructure. In order to minimise the contribution of impacts to avifauna in the region, a detailed monitoring protocol for the operational phase of the PV projects has been proposed by the specialist. The overall cumulative impact on avifauna is considered to be of **MEDIUM** significance.

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Freshwater

Generally, the nature of photovoltaic power projects, and associated transmission lines, allows them to have a limited impact on surface water features. However, the agricultural practices within the study area have led to impacts on the existing freshwater features. The specialist notes that the cumulative impact of this project is considered to be of **LOW** significance as the proposed development does not encroach within any freshwater ecosystem and as such direct impacts will be avoided.

Soils and Agriculture

The development of the proposed Scafell Cluster Project will lead to several cumulative impacts from a soils and agriculture perspective. The specialist notes that the cumulative impacts for the proposed Scafell Cluster Project will be **HIGH** due to a larger area being affected by the proposed project.

Heritage and Palaeontology

Heritage resources include sites of paleontological, archaeological, cultural, or historical importance. There are a number of activities and infrastructure related to the combined project that have the potential to damage heritage (including cultural) resources and result in the loss of the resource for future generations.

The heritage specialist identified heritage resources of varying significance within the project footprints associated with the Scafell Cluster, thus cumulative impacts in the unmitigated scenario could be expected for known heritage resources located within the Scafell Cluster project. Furthermore, the establishment of these projects increases the possibility that unknown heritage and paleontological resources are uncovered. In the unmitigated scenario, when considering the significance of the impact on undiscovered paleontological and heritage resources is a significant potential impact.

By employing a chance-find procedure in the event such previously undiscovered resources are uncovered, conducting detailed studies, and obtaining the relevant permits for the destruction or removal of the heritage sites (if required) that could be directly impacted by project infrastructure and by protecting those that could be indirectly impacted, the significance can be reduced.

As most heritage resources are point specific and, in general, impacts are found to be localised and impacting on the specific resource in a development, the cumulative impact on heritage and paleontological resources is deemed to be **LOW** with the implementation of mitigation.

Visual Impact

The cumulative impact of the project, all facilities and infrastructure taken together, along with the existing power infrastructure (Scafell MTS sub-station and Transmission lines emanating from it), is deemed to be significant by the visual specialist. Intervisibility for the proposed Scafell Cluster project and the existing infrastructure would be evident. As the visual absorption capacity of the study area is relatively low, the combined effect over time of these developments would result in the study area

being impacted upon in a manner beyond the anticipated negative impacts of the proposed project alone. With mitigation, the impact can be reduced when the proposed vegetation screening along the northern and southern edge of the Scafell Cluster project begin to mature. The overall cumulative visual impact is considered to be of negative **MEDIUM** to **HIGH** significance.

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Socio-economic

Most social impacts would impact on the farming community that resides close to the project site and, to a lesser extent, the towns closest to the proposed development – Parys, Sasolburg, Vereeniging and Vanderbijlpark. The creation of additional economic opportunities for the area would go a long way to offset the negative socio-economic impacts and establishment of Community Trusts or funding of development initiatives in the area would support local economic and community development. This benefit is considered to be of *MEDIUM (POSITIVE)* significance.

However, as noted in Section 8.7.5 above the ongoing safety and security issues could potentially be exacerbated by the proposed projects. This is deemed to be a **MEDIUM** significant impact on existing social networks and community structures.

8.9 'NO-GO' ALTERNATIVE

The No-Go alternative represents the option not to proceed with the proposed project, which leaves the project site in its current state (refer to the baseline description presented in Chapter 7), except for variation by natural causes and other human activities. It, thus, represents the current status quo and the baseline against which all potential project-related impacts are assessed. The No-Go alternative would also forego the potential cumulative negative impacts and possible advantages of the proposed project, e.g., job creation and community upliftment.

Vegetation

The botanical specialist has noted that bush encroachment was observed within the study area, particularly with respect to the proliferation of *Seriphium plumosum* in certain habitats on site. This species has been identified as a problematic encroacher species within the Grassland Biome (Mucina and Rutherford 2006). Thus, it is possible that without any intervention this species would continue to dominate and ultimately reduce the overall habitat for other indigenous species and result in the gradual degradation of CBA and ESA areas. Given the uncertainty, this is deemed to be **LOW** to **MEDIUM** significant impact.

Fauna and Avifauna

The study area contains no unique or important faunal habitats relative to the surrounding area. The no-go alternative would result in no change to the existing land use activities on the site and associated impacts on faunal species and habitats.

Freshwater

As the proposed project area does not encroach within any freshwater ecosystems, there are no impacts associated with the no-go alternative.

Soils and Agriculture Potential

The No-go option from a soils and agriculture potential perspective will result in no impacts and the only impact from this alternative will be that of livestock grazing. The impact of livestock grazing on agriculture potential is deemed to be minimal unless the grazing capacity of the project site is exceeded.

Heritage

The site is already highly disturbed from past and present farming activities. No further destruction or disturbance to the cultural landscape is considered likely to occur.

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Socio-economic

The impacts of pursuing the No-go Option are both positive and negative as that there is no change in status quo in terms of the negative impacts described above during all project phases which would be experienced by neighbours, society, and the landscape — namely through disruption, noise, visual, traffic and safety impacts. However, there would also be an opportunity loss in terms of job creation, skills development and associated economic multipliers for the local economy. The impact is deemed to be negative and of **LOW** significance.



9. CONCLUSIONS AND RECOMMENDATIONS

9.1 CONCLUSIONS

Mainstream is proposing the development of Electrical Grid Infrastructure associated with the proposed Damlaagte Solar PV Facility. Two grid corridor routings (see Figure 9-1) were investigated as part of this BA Process:

- Alternative 1 (Preferred): This corridor is 150 m wide and is approximately 2.0 km in length. The proposed grid connection is from the on-site substation (Switching Station) of the proposed Damlaagte Solar Facility located on Damlaagte RE/229 and extends for about 1 km in an easterly direction across Willow Grange 3/246 before turning about 90° south for 0.6 km across Scafell RE/448, then turning slightly southeast for 0.3 km before terminating at the ESKOM Scafell MTS. This is the shortest most direct route to connect to the ESKOM Scafell MTS.
- Alternative 2: This corridor is 150 m wide and is also approximately 2.5 km in length. This proposed grid connection starts at the on-site substation (Switching Station) of the proposed Damlaagte Solar Facility located on Damlaagte RE/229 and extends for about 0.6 km in an easterly direction across Willow Grange 3/246, then turns about 90° southwest for 0.7 km and then southeast for 0.9km onto Procedeerfontein 5/100, and then turns northeast for 0.2 km before terminating at the ESKOM Scafell MTS located on Scafell RE/448.

A summary of the assessment of potential environmental impacts associated with the proposed grid corridors and associated infrastructure is provided below and in Table 9-1.

Table 9-1: Summary of the significance of potential impacts associated with the proposed project

Environmental	Potential Impacts	CONSTRUCTION PHASE		OPERATIONAL PHASE		DECOMMISSIONING PHASE	
component		Without mitigation	With mitigation	Without mitigation	With mitigation	Without mitigation	With mitigation
Ecological Impacts	Impacts on Vegetation	Medium	LOW	Low	LOW	Medium	LOW
	Impact on Terrestrial Fauna	Very Low	VERY LOW	Very Low	VERY LOW	Very Low	VERY LOW
	Impacts on avifauna	Low	LOW	High	MEDIUM	Low	LOW
	Impacts on freshwater resources	Low	LOW	Low	LOW	Low	LOW
Biophysical Impacts	Nuisance impacts (air quality and noise)	Low	Insignificant	-	-	Low	Insignificant
	Impacts on soils and associated agricultural potential	High	MEDIUM	Medium	VERY LOW	High	MEDIUM
Socio- economic Impacts	Impacts on the Heritage and Cultural Environment	Very Low	Insignificant	-	-	-	-
	Impact on Palaeontological Resources	Very Low	Insignificant	-	-	-	-



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Environmental component	Potential Impacts	CONSTRUCTION PHASE		OPERATIONAL PHASE		DECOMMISSIONING PHASE	
		Without mitigation	With mitigation	Without mitigation	With mitigation	Without mitigation	With mitigation
	Visual Impact	Low	LOW	Medium	LOW	Very Low	VERY LOW
	Creation of employment and business opportunities	High (positive)	HIGH (positive)	-	-	-	-
	Impact on safety and security on neighbouring residents	Medium	Low	-	-	-	-
	Impact on traffic	Low	VERY LOW	Low	VERY LOW	-	-
No-Go Alternati	ve			LOW to N	1EDIUM		

9.1.1 Fit With Legislation, Policy and Planning

A review of the relevant legislation, policies and documents pertaining to the energy sector indicate that renewable energy and supporting infrastructure are supported at a national, provincial, and local level. Thus, the establishment of the proposed project is supported by the relevant policy and planning documentation at a national and local level.

9.1.2 Construction and Decommissioning Phases

The majority of the impacts associated with the construction and decommissioning phases would be very localised (i.e., occurring on site only) and of short-term duration (i.e., reversible). The majority of the impacts associated with these two phases, are considered to be **INSIGNIFICANT** or of **VERY LOW to LOW** significance with mitigation. The most significant construction phase impact is related to the creation of employment for the duration of the construction period and business opportunities particularly in the local service industry, which is considered to be of **HIGH (POSITIVE)** significance with mitigation. However, the potential impacts on soils and associated loss of agricultural potential are deemed to be of **MEDIUM** significance.

9.1.3 Operation Phase

The assessment is based on an indicative layout as presented in Figure 5-1. In general, the impacts associated with the operation phase are long-term, as the Power Purchase Agreement associated with the Solar PV facility is valid for a period of 20 years, after which the Agreement can be renewed or the power plant, and thus the associated grid transmission line are decommissioned. The key negative impact related to the operation phase is the potential impact on avifauna. Collisions with overhead transmission lines are the biggest threat to birds during the operational phase. The species susceptible to collisions with the transmission line on site include waterbirds, terrestrial species, and raptors. As this risk would remain throughout the duration of the operational phase, it is considered to be of **MEDIUM** significance with mitigation; and

The remaining negative impacts are generally considered to be of **VERY LOW** to **LOW** significance with mitigation. The significance ratings are associated, to a large extent, with the following:



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- The small disturbance footprint and short length associated with the proposed project; and
- There are no unique or important faunal habitats found on site relative to the surrounding area.

9.1.4 Cumulative Impacts

The cumulative impact on fauna, freshwater and heritage and palaeontology are considered to be **LOW** significance with mitigation. All cumulative impacts on terrestrial flora are considered to be of **LOW** to **MEDIUM** significance.

The key cumulative socio-economic impacts include:

- The visual impact associated with the projects on the areas sense of place and landscape character is considered to be of MEDIUM to HIGH significance;
- The cumulative impact associated with the creation of local employment and business opportunities
 is considered to be MEDIUM (POSITIVE) significance, it would go a long way to offsetting the negative
 socio-economic impacts; and
- The increase in construction activities in the area could potentially exacerbate ongoing safety and security issues currently being experienced in the area. This is deemed to be a **MEDIUM** significant impact on existing social networks and community structures.

9.2 CONCLUSIONS

9.2.1 Layout and Design Alternatives

The assessment is based on an indicative development layout and considers the possibility that the position of some structures within the general development footprint area may be adjusted slightly. Due to the relatively short length of each transmission line alternative and the fact that they are located in relatively close proximity to one another, the overall impact assessment significance for each alternative was deemed to be the same. Thus, Alternative 1 is considered as to be the most technically feasible grid connection corridor for development (see Figure 9-1). Refer to Table 9-2 for the technical details of the preferred grid connection corridor.

Table 9-2: Technical Details of The Preferred Grid Connection Corridor

Component		Damlaagte Grid Connection		
Property details:	Corridor Alternative 1 (Preferred)	Damlaagte 229 Remaining Extent Willow Grange 246 Portion 3 Scafell 448 Remaining Extent		
Grid Connection Corridor Dimensions		Corridor Alternative 1 (Preferred)		
Grid Connection Corridor Width:		150 m wide (and up to 500 m around the switching station footprint)		
Grid Connection Corridor Length:		2 km		
Servitude width:		Up to 31 m		



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Component	Damlaagte Grid Connection
Grid Connection Corridor Coordinates	Alternative 1 (Preferred)
01	26°47'57.10"S 27°37'35.06"E
02	26°48'14.38"S 27°38'16.36"E
03	26°48'33.89"S 27°38'13.50"E
04	26°48'36.83"S 27°38'25.18"E
05	26°48'44.88"S 27°38'29.42"E
06	26°48'55.14"S 27°38'11.01"E
07	26°48'43.36"S 27°38'2.63"E
Switching Station Coordinates	26°48'1.16"S 27°37'40.55"E
Switching Station capacity:	33 / 132 kV
Switching Station footprint:	Up to 2.5 ha
Transmission Line capacity:	Up to 132 kV
Transmission Line length:	Up to 2 km
Transmission Line pylons:	Monopole or Lattice pylons, or a combination of both where required
Power Line pylon height:	Up to 30 m
Access to transmission line servitude:	A 12 m wide and 5 km long jeep track will be required and constructed during the construction phase of the proposed project. Existing roads and jeep tracks within existing servitudes in the study area will be used as far as possible to gain access to the grid connection corridor during the construction and operation phase of the proposed project.

9.2.2 No-Go Alternative

The No-Go alternative represents the option of not to proceed with the proposed project, which leaves the project area of influence in its current state, except for variation by natural causes and other human activities. It, thus, represents the current status quo and the baseline against which all potential project-related impacts are assessed. The No-Go alternative would also forego the potential cumulative negative impacts and possible advantages of the proposed project, e.g., creation of employment opportunities.

The most significant of the no-go impacts identified, was the likelihood that the proliferation of *Seriphium plumosum* would continue unabated in certain habitats on site. This species has been identified as a problematic encroacher species within the Grassland Biome (Mucina and Rutherford 2006). Thus, it is possible that without any intervention this species would continue to dominate and ultimately reduce the overall habitat for other indigenous species and result in the gradual degradation of CBA and ESA areas. Given the uncertainty, this is deemed to be **LOW** to **MEDIUM** significant impact



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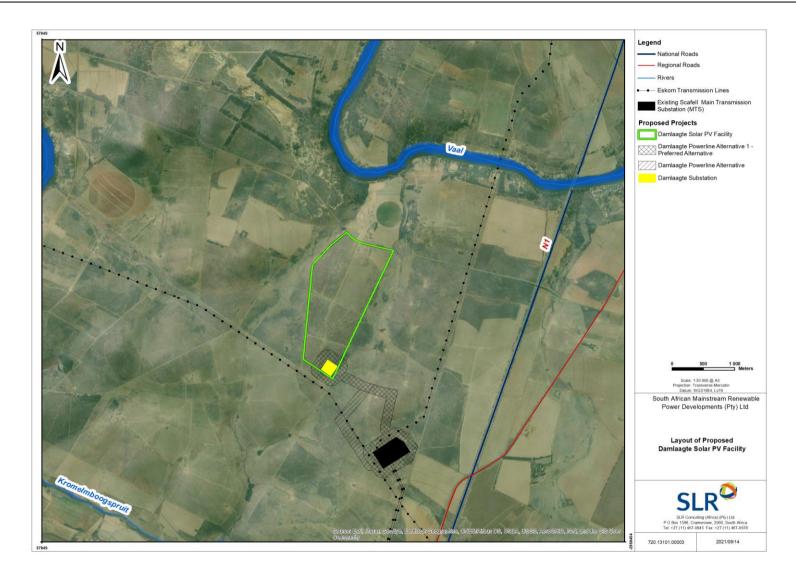


Figure 9-1: Preliminary layout map of the proposed grid connection infrastructure for the Damlaagte Solar PV Facility

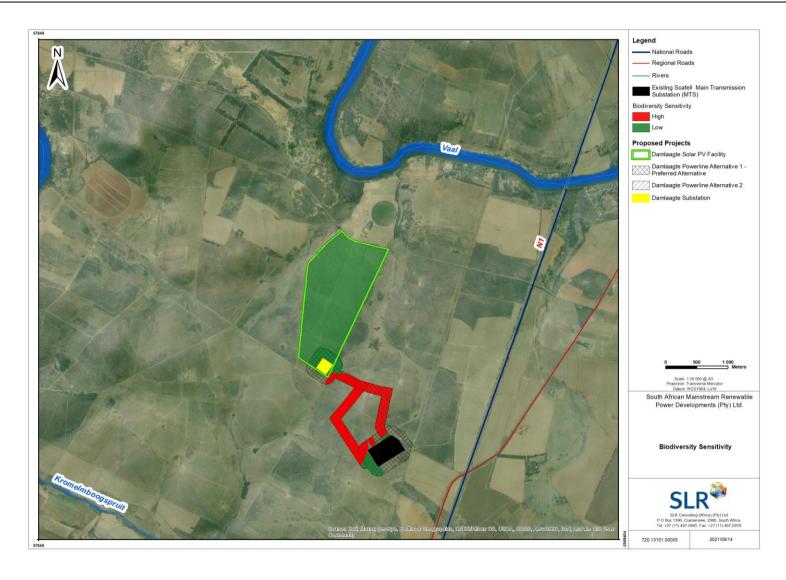


Figure 9-2: Composite environmental sensitivity map of the grid connection corridors assessed in this BAR for the proposed Damlaagte Solar PV Facility Grid Connection



9.2.3 Recommendation / Opinion of Environmental Assessment Practitioner

The key principles of sustainability, including ecological integrity, equity and social justice, and economic efficiency, are integrated below as part of the supporting rationale for recommending an opinion on whether the proposed project should be approved.

<u>Ecological integrity</u>

The use of renewable energy (e.g., solar and wind) is considered to have significant ecological benefits and is a key component in the transition from the economy's dependence on fossil fuels. The proposed project is intended to support a proposed solar PV facility, which would help to offset the total carbon emissions associated with energy generation in South Africa. Reduced carbon emissions through the use of renewable energy would have benefits in terms of global warming and climate change. In terms of site location, the proposed project is located in an area that has suitably high solar radiation intensities and is thus considered to be an efficient use of available resources.

The proposed project would result in the clearing of an estimated 3 ha of existing vegetation, however, in terms of positioning on site, the mapped CBA areas on site can be generally avoided. Although the localised impact on the vegetation is one of the more significant biophysical impacts, it is deemed to be largely reversible at the end of the project when the transmission line is decommissioned, and the site rehabilitated.

The proposed transmission line would add to the potential risk of bird strikes However, this impact is not considered to be a "new" impact in the area, due to the numerous existing power lines linking to the Scafell substation. Furthermore, the proposed mitigation measures would reduce the likelihood of this impact occurring.

In summary, the proposed project would result in the loss of some ecological integrity in the study area, but it is considered to be small and localised.

Equity and social justice

With respect to potential impacts on the existing agricultural activities on site, the landowner will enter into an applicable lease agreement with the proponent and as such the loss of grazing would likely be offset by the income the farmer would receive from the lease agreement. From the agricultural assessment it is noted that crop production on the property had been stopped in 2006 and the property has been used for extensive livestock farming. Once crop production was abandoned, the fields were left fallow and pioneer species established themselves.

The proposed project would create a number of local employment and business opportunities. It is anticipated that a large number of the low and medium skilled employment opportunities could be sourced from the local labour force in and around the site with the implementation of a skills development and training programme during the construction phase. In terms of business opportunities for local companies, procurement would create business opportunities for the regional and local economy. A percentage of the monthly wage bill earned by employees would be spent in the regional and local economy, which would result in indirect benefits to local businesses in the nearby towns of Parys and Sasolburg.



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The proposed project would alter the local visual landscape / rural character of the site, which would have a visual impact in the immediate surrounding area and especially along the N1 national road. This impact is mitigated to a certain extent by the existing visual clutter in the rural landscape, which has increased the visual absorption capacity for the proposed project.

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Thus, in terms of the issue of equity and social justice, the proposed project is considered to result in the equitable distribution of positive and negative impacts with no one group or community being adversely affected.

Economic efficiency

South Africa is facing a rising demand for power and is looking for other energy sources, including renewable energy, to decrease its dependence on the coal-fired power that provides most of the country's electricity. As such, renewable energy technologies are playing a key role in meeting South Africa's energy needs into the future. The proposed project is intended to support the establishment of a solar PV facility and thus furthers this goal.

The proposed project is considered ideally located in order to link into the national grid, due to its close proximity to the existing ESKOM Scafell MTS.

From the above sustainability criteria, the nature and extent of the proposed development, compliance with the relevant legal, policy and planning documentation (i.e., "need and desirability") and the findings of the specialist studies, it is the opinion of SLR that the proposed project can be supported from an environmental perspective and should be considered for Environmental Authorisation, subject to the implementation of the identified recommendations.



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