

APPENDIX C7:
Comments Received



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 · PRETORIA · 0001 · Environment House · 473 Steve Biko Road, Arcadia, · PRETORIA

DFFE Reference: 14/12/16/3/3/1/2406

Enquiries: Ms Constance Musemburi

Telephone: (012) 399 9416, **E-mail:** cmusemburi@environment.gov.za

Jo-Anne Thomas
Savannah Environmental (Pty) Ltd.
P. O. Box 148
SUNNINGHILL
2157

Tel: (011) 656 3237
E-Mail: joanne@savannahsa.com

PER MAIL / E-MAIL

Dear Ms Thomas

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED CONSTRUCTION AND OPERATION OF THE GRID CONNECTION INFRASTRUCTURE TO THE PROPOSED 100Mac VREDE SOLAR ENERGY FACILITY, BATTERY ENERGY STORAGE SYSTEM (BESS) AND ASSOCIATED INFRASTRUCTURE LOCATED NEAR KROONSTAD IN THE MOQHAKA LOCAL MUNICIPALITY, FEZILE DABI DISTRICT IN THE FREE STATE PROVINCE.

The draft Basic Assessment Report (BAR) dated August 2021 and received by this Department on 06 August 2021, refers.

This letter serves to inform you that the following information must be included to the final BAR:

(a) Listed activities and required information

- Please clarify whether the proposed development also include BESS facility? The Department understands that this application is related to the Rondavel Photovoltaic Solar Energy Facility, Battery Energy Storage System (BESS) and associated infrastructure (DFFE Ref: 14/12/16/3/3/2/2039) which also include a BESS facility. Please clarify this. If no BESS facility is being applied for the proposed development, please ensure that all reference to BESS facility must be removed in the FBAR.
- Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed.
- If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.environment.gov.za/documents/forms> .
- It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.
- The Environmental Assessment Practitioner (EAP) is required to provide the potential impacts and mitigation measures of the proposed infrastructure.

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- The EMPr must include mitigation and monitoring measures to all the environmental impacts identified and assessed for the above-mentioned proposed activity. Furthermore, the EMPr must include all recommendations and mitigation measures recorded in the final BAR.

(b) Layout & Sensitivity Maps

Please provide a layout map which indicates the following:

- All supporting onsite infrastructure that will support the proposed development, e.g. roads (existing and proposed), camp sites, and etc.
- The preferred route/layout alternative.
- The location of sensitive environmental features on site e.g. Critical Biodiversity Areas (CBAs), heritage sites, wetlands, drainage lines, anticipated erosion, farming activities, existing substation, etc, that will be affected.
- Buffer areas; and, all “no-go” areas.
- The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring developments and all existing infrastructure that will be affected by the proposed project.
- The total footprint and centre coordinates of the area and exact location of the proposed development and associated infrastructure must be mapped at an appropriate scale.

(c) Specialist Declaration of Interest

Specialist Declaration of Interest forms must be attached to the final BAR. You are therefore requested to submit original signed Specialist Declaration of Interest forms for each specialist study conducted. The forms are available on Department’s website (please use the Department’s template).

(d) Specialist Assessments

- i. Specialist studies to be conducted must provide a detailed description of their methodology, as well as all other associated infrastructure that they have assessed and are recommending for the authorisation.
- ii. The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.
- iii. Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.

(e) Alternatives

• Please note that you are required to provide a full description of the process followed to reach the proposed preferred alternative within the site, in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended, including the following content:

- (a) details of all the alternatives considered;
- (b) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;
- (c) 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;
- (d) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;
- (e) 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—
- (f) (aa) can be reversed;
- (g) (bb) may cause irreplaceable loss of resources; and
- (h) (cc) can be avoided, managed or mitigated;

- (i) 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;
 - (j) 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;
 - (k) the possible mitigation measures that could be applied and level of residual risk;
 - (l) the outcome of the site selection matrix;
 - (m) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and
 - (n) a concluding statement indicating the preferred alternatives, including preferred location of the activity.
- Written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.

(f) Undertaking of an Oath

- i. The Department has noted that the submitted application form has an undertaking under oath or affirmation by the EAP. However, the aforementioned oath was not included in the draft BAR, but rather an appendix of the application form attached to the BAR. Please note that the final BAR must also have an undertaking under oath/ affirmation by the EAP.
- ii. Based on the above, you are therefore required to include an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 1(3)(r) of the NEMA EIA Regulations, 2014, as amended, which states that the BAR must include:
“an undertaking under oath or affirmation by the EAP in relation to:
 - a) *the correctness of the information provided in the reports;*
 - b) *the inclusion of comments and inputs from stakeholders and I&APs;*
 - c) *the inclusion of inputs and recommendations from the specialist reports where relevant; and*
 - d) *any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties”.*

(g) Details and Expertise of the EAP

You are required to include the details and expertise of the EAP in the BAR, including a curriculum vitae, in order to comply with the requirements of Appendix 1(3)(1)(a) of the NEMA EIA Regulations, 2014, as amended.

(h) Public Participation Process

- i. The following information must be submitted with the final BAR:
 - a) A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended;
 - b) Copies of all comments received during the draft BAR comment period; and
 - c) A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the draft BAR. Please note that comments received from this Department must also form part of the comment and response report.
- ii. Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR.

iii. Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.

(i) **Environmental Management Programme**

(a) You are required to comply with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.

(j) **Environmental Impact Statement**

It is noted that an environmental impact statement is not included in the draft BAR, therefore you are kindly requested to include an environmental impact statement which contains –

- a) a summary of the key findings of the environmental impact assessment;
- b) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the site indicating any areas that should be avoided, including buffers; and
- c) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.

Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.

You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *“Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority -*

(a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.”

Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended, which states: *“the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days”.*

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely,



Mr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Signed by: Mr Lerato Mokoena

Designation: Assistant Director: Priority Infrastructure Projects

Date: 02 September 2021

cc:	Eugene Marais	South Africa Mainstream Renewable Power Developments (Pty) Ltd	E-mail: Eugene.Marais@mainstreamrp.com
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Savannah Public Process

From: Anton B Meyer <meyerab54@gmail.com>
Sent: Saturday, August 7, 2021 3:15 PM
To: Savannah Public Process
Cc: Braam Visagie; gabrie.grobler@gmail.com; keke.ramantso1; Abraham Nthako; Leonard Mafokosi; semangsemila@gmail.com; P Motlhuri; Liza Janse van Vuuren; morenathebe@yahoo.com; tharia@icloud.com; Nondumiso Bulunga; Tumelo Mathulwe; Mmakoena Mmola
Subject: Re: SE2716-VREDE AND RONDAVEL ELECTRICAL GRID INFRASTRUCTURE: Notification of Basic Assessment Reports available for review and comment
Attachments: image002.gif

Dear Savannah,

It is clear that you do not understand that Savannah's continuation with this process is deeply irregular & fundamentally flawed!

Your instructions client, Mainstream Renewable is withholding critical & vital information, Repeated requests for this INFORMATION has wilfully & deliberately IGNORED, begging the question? WHY?????

Thus compromising the truthfulness & validity of the whole process, and by continuing to engage with persons like myself, under the guise of interested or affected parties, to satisfy a RED TAPE, alternatively Administrative procedure is unacceptable!

Your statement that this or any responses will be added to the comments file, is frankly disingenuous, arrogant and uncalled for.

Sincerely,
Anton B Meyer.

On Sat, 07 Aug 2021, 14:55 Savannah Public Process, <publicprocess@savannahsa.com> wrote:

Dear Mr Meyer,

Thank you for your e-mail below.

Attached please find the updated letter with the correct review and comment period for the Vrede and Rondavel Electrical Grid Infrastructure (EGI) Basic Assessment (BA) Reports.

The comments on the Vrede and Rondavel Solar Energy Facilities are note applicable to the EGI applications.

The comments submitted below will, however, be included in the comments and responses reports of the final BA Reports.

Kind regards,



Nicolene Venter

Public Process

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SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

From: Anton Meyer <meyerab54@gmail.com>

Sent: Saturday, August 7, 2021 11:36 AM

To: Savannah Public Process <publicprocess@savannahsa.com>

Cc: Braam Visagie <braamvisagie@gmail.com>; gabrie.grobler@gmail.com; keke.ramantso1 <keke.ramantso1@gmail.com>; asnthako@gmail.com; leonardmafokosi@gmail.com; semangsemila@gmail.com; motlhudip@gmail.com; liza.jansevanvuuren@mainstreamrp.com; Nicolene Venter <nicolene@savannahsa.com>; Savannah Public Process <publicprocess@savannahsa.com>; morenathebe@yahoo.com; tharia@icloud.com

Subject: RE: SE2716-VREDE AND RONDAVEL ELECTRICAL GRID INFRASTRUCTURE: Notification of Basic Assessment Reports available for review and comment

Dear Savannah Environmental / Mainstream Renewal,

Your Public Notice for Public Participation is fundamentally and irretrievably flawed.

For the following reasons;

1. The date for submitting submissions is the same as the closing date, both the 6TH OF AUGUST 2021,
2. Savannah Environmental is wilfully and deliberately ignoring the result of the last, well attended public meeting at the Constantia Hall, Maokeng, Kroonstad, at which the following was decided,
 - a. The community of Moqhaka can not, and WILL NOT support the Mainstream SPV projects,
 - b. This due to the lack of community involvement and participation in the projects,
 - c. There was no financial gain and or accrual to the citizens of Moqhaka,
 - d. In addition the long outstanding question THAT HAS NEVER BEEN ANSWERED, under which REIPPPP (Model / Number) does this Public Participation Process reside.
 - e. You will recall it, the question was asked as early as January 2021, at the first virtual meeting!
 - f. It is my concern that the community of Moqhaka is being embroiled in malfeasance, as to the legality of the various public participatory exercises, (See points d & e above), and any or all further

participation in any or all requests for Public Participation will make the Community of Moqhaka complicit the aforementioned malfeasance!

g. I for one will and can not in good conscience continue with this practice!

Yours sincerely,

Anton B Meyer

Sent from [Mail](#) for Windows 10

From: [Savannah Environmental](#)

Sent: Friday, 06 August 2021 14:30

To: [Anton Meyer](#)

Subject: SE2716-VREDE AND RONDAVEL ELECTRICAL GRID INFRASTRUCTURE: Notification of Basic Assessment Reports available for review and comment

ELECTRICAL GRID INFRASTRUCTURE (EGI) FOR THE 100MWac VREDE AND 100MWac RONDAVEL PHOTOVOLTAIC (PV) SOLAR ENERGY FACILITIES, LOCATED NEAR KROONSTAD, FREE STATE PROVINCE (DFFE Ref. Nos.: To be Issued)

Dear Stakeholder and Interested & Affected Party,

South Africa Mainstream Renewable Power Developments (Pty) Ltd is proposing the development of Electrical Grid Infrastructure (EGI) required to enable the evacuation of generated electricity from the Vrede PV Solar Energy Facility and the Rondavel PV Solar Energy Facility, located ~11km and 6km, respectively, from Kroonstad in the Moqhaka Local Municipality (Fezile Dabi District Municipality), Free State Province.

The key infrastructure and components associated with each EGI include a 132kV double- or single-circuit overhead power line, a 33/132kV on-site Eskom substation, associated equipment, infrastructure, and buildings, and temporary and permanent laydown areas. The Vrede PV Solar Energy Facility will connect to the national grid via a loop-in loop-out connection into the existing Eskom 132kV Kroonstad Municipality - Theseus 1 132kV Switching Station power line. The Rondavel PV Solar Energy Facility will loop in and loop out into the Eskom 132kV Kroonstad Municipality – Kroonstad Switching Station power line or connect directly with the Kroonstad Municipality 132/66kV substation, depending on which alternative is constructed. Two (2) alternative corridors, each with a varying width of up to 400m are being considered for the Vrede grid connection, and three for the Rondavel grid connection. In addition, two alternative substation locations are being considered for the Rondavel EGI, and only one substation location is being considered for the Vrede EGI. Regardless of which grid corridor alternative is approved for each respective project, a 4 – 6m wide servitude service road under the power line is also required.

Please find attached the notification letter in which you, as a registered Stakeholder and/or Interested and Affected Party (I&AP), are informed of the availability and review/comments to the Basic Assessment Reports.

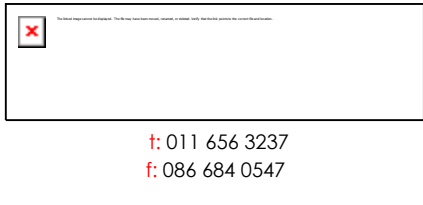
The BARs are available for download from Savannah Environmental's stakeholder engagement platform at [Click Here](#)

Please do not hesitate to contact us should you require any additional information and/or clarification regarding the projects.

Our team welcomes your participation and look forward to your comments on the BARs.

Kind regards,

[Unsubscribe this type of email](#)



Nicolene Venter
Public Process

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[SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015](#)

Savannah Public Process

From: John Geeringh <GeerinJH@eskom.co.za>
Sent: Tuesday, August 10, 2021 1:25 PM
To: Savannah Public Process
Subject: RE: SE2716: VREDE AND RONDAVEL ELECTRICAL GRID INFRASTRUCTURE: Notification of Basic Assessment Reports available for review and comment
Attachments: Eskom requirements for work in or near Eskom servitudes.doc

Please send me KMZ files of the proposed grid connections. Please find attached Eskom requirements for works at or near Eskom infrastructure and servitudes.

Kind regards

John Geeringh (Pr Sci Nat) Reg. EAP (EAPASA)
Senior Consultant Environmental Management
Grid Planning: Land and Rights
Eskom Transmission Division
Megawatt Park, D1Y42, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
Tel: 011 516 7233
Cell: 083 632 7663
Fax: 086 661 4064
E-mail: john.geeringh@eskom.co.za



From: Savannah Environmental <publicprocess@savannahsa.com>
Sent: Friday, 06 August 2021 17:08
To: John Geeringh <GeerinJH@eskom.co.za>
Subject: SE2716: VREDE AND RONDAVEL ELECTRICAL GRID INFRASTRUCTURE: Notification of Basic Assessment Reports available for review and comment

ELECTRICAL GRID INFRASTRUCTURE (EGI) FOR THE 100MWac VREDE AND 100MWac RONDAVEL PHOTOVOLTAIC (PV) SOLAR ENERGY FACILITIES, LOCATED NEAR KROONSTAD, FREE STATE PROVINCE (DFFE Ref. Nos.: To be Issued)

Dear Stakeholder and Interested & Affected Party,
South Africa Mainstream Renewable Power Developments (Pty) Ltd is proposing the development of Electrical Grid Infrastructure (EGI) required to enable the evacuation of generated electricity from the Vrede PV Solar Energy Facility and the Rondavel PV Solar Energy Facility, located ~11km and 6km, respectively, from Kroonstad in the Moqhaka Local Municipality (Fezile Dabi District Municipality), Free State Province.
The key infrastructure and components associated with each EGI include a 132kV double- or single-circuit overhead power line, a 33/132kV on-site Eskom substation, associated equipment, infrastructure, and

buildings, and temporary and permanent laydown areas. The Vrede PV Solar Energy Facility will connect to the national grid via a loop-in loop-out connection into the existing Eskom 132kV Kroonstad Municipality - Theseus 1 132kV Switching Station power line. The Rondavel PV Solar Energy Facility will loop in and loop out into the Eskom 132kV Kroonstad Municipality – Kroonstad Switching Station power line or connect directly with the Kroonstad Municipality 132/66kV substation, depending on which alternative is constructed. Two (2) alternative corridors, each with a varying width of up to 400m are being considered for the Vrede grid connection, and three for the Rondavel grid connection. In addition, two alternative substation locations are being considered for the Rondavel EGI, and only one substation location is being considered for the Vrede EGI. Regardless of which grid corridor alternative is approved for each respective project, a 4 – 6m wide servitude service road under the power line is also required.

Please find attached the notification letter in which you, as a registered Stakeholder and/or Interested and Affected Party (I&AP), are informed of the availability and review/comments to the Basic Assessment Reports.

The BARs are available for download from Savannah Environmental’s stakeholder engagement platform at [Click Here](#)

- Please do not hesitate to contact us should you require any additional information and/or clarification regarding the projects.

Our team welcomes your participation and look forward to your comments on the BARs.

Kind regards,

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[SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015](#)

NB: This Email and its contents are subject to the Eskom Holdings SOC Ltd EMAIL LEGAL NOTICE which can be viewed at http://www.eskom.co.za/Pages/Email_Legal_Spam_Disclaimer.aspx

TO WHOM IT MAY CONCERN

Eskom requirements for work in or near Eskom servitudes.

1. Eskom's rights and services must be acknowledged and respected at all times.
2. Eskom shall at all times retain unobstructed access to and egress from its servitudes.
3. Eskom's consent does not relieve the developer from obtaining the necessary statutory, land owner or municipal approvals.
4. Any cost incurred by Eskom as a result of non-compliance to any relevant environmental legislation will be charged to the developer.
5. If Eskom has to incur any expenditure in order to comply with statutory clearances or other regulations as a result of the developer's activities or because of the presence of his equipment or installation within the servitude restriction area, the developer shall pay such costs to Eskom on demand.
6. The use of explosives of any type within 500 metres of Eskom's services shall only occur with Eskom's previous written permission. If such permission is granted the developer must give at least fourteen working days prior notice of the commencement of blasting. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued in terms of the blasting process. It is advisable to make application separately in this regard.
7. Changes in ground level may not infringe statutory ground to conductor clearances or statutory visibility clearances. After any changes in ground level, the surface shall be rehabilitated and stabilised so as to prevent erosion. The measures taken shall be to Eskom's satisfaction.
8. Eskom shall not be liable for the death of or injury to any person or for the loss of or damage to any property whether as a result of the encroachment or of the use of the servitude area by the developer, his/her agent, contractors, employees, successors in title, and assignees. The developer indemnifies Eskom against loss, claims or damages including claims pertaining to consequential damages by third parties and whether as a result of damage to or interruption of or interference with Eskom's services or apparatus or otherwise. Eskom will not be held responsible for damage to the developer's equipment.
9. No mechanical equipment, including mechanical excavators or high lifting machinery, shall be used in the vicinity of Eskom's apparatus and/or services, without prior written permission having been granted by Eskom. If such permission is granted the developer must give at least seven working days' notice prior to the commencement of work. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued by the relevant Eskom Manager

Note: Where an electrical outage is required, at least fourteen work days are required to arrange it.

10. Eskom's rights and duties in the servitude shall be accepted as having prior right at all times and shall not be obstructed or interfered with.
11. Under no circumstances shall rubble, earth or other material be dumped within the servitude restriction area. The developer shall maintain the area concerned to Eskom's satisfaction. The developer shall be liable to Eskom for the cost of any remedial action which has to be carried out by Eskom.
12. The clearances between Eskom's live electrical equipment and the proposed construction work shall be observed as stipulated by *Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993)*.
13. Equipment shall be regarded electrically live and therefore dangerous at all times.
14. In spite of the restrictions stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993), as an additional safety precaution, Eskom will not approve the erection of houses, or structures occupied or frequented by human beings, under the power lines or within the servitude restriction area.
15. Eskom may stipulate any additional requirements to highlight any possible exposure to Customers or Public to coming into contact or be exposed to any dangers of Eskom plant.
16. It is required of the developer to familiarise himself with all safety hazards related to Electrical plant.
17. Any third party servitudes encroaching on Eskom servitudes shall be registered against Eskom's title deed at the developer's own cost. If such a servitude is brought into being, its existence should be endorsed on the Eskom servitude deed concerned, while the third party's servitude deed must also include the rights of the affected Eskom servitude.

John Geeringh (Pr Sci Nat)(EAPASA)
Senior Consultant Environmental Management
Eskom Transmission Division: Land & Rights
Megawatt Park, D1Y42, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
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E-mail: john.geeringh@eskom.co.za

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Sityhilelo Ngcatsha
Tel: 0212028663
Email: sngcatsha@sahra.org.za
CaseID: 16942

Date: Tuesday August 31, 2021
Page No: 1

Final Comment

In terms of Section 38(8), 38(4) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Savannah Environmental (Pty) Ltd

PO Box 148
Sunninghill
2157

South Africa Mainstream Renewable Power Developments (Pty) Ltd is proposing the construction and operation of the grid connection infrastructure for the proposed 100 MWac Vrede Solar Energy Facility (SEF), Battery Energy Storage System (BESS) and associated infrastructure located near the town of Kroonstad in the Moqhaka Local Municipality (Fezile Dabi District) of the Free State Province of South Africa. The proposed development traverses three (3) farm parcels namely: Farm Vrede, No. 1152, Remaining Extent; Farm Gesukkel, No. 1153, Remaining Extent; Farm Geduld No. 1156, Remaining Extent.

South Africa Mainstream Renewable Power Developments (Pty) Ltd appointed Savannah Environmental (Pty) Ltd to undertake the Environmental Authorisation (EA) Application for the proposed construction and operation of the grid connection infrastructure for the proposed 100 MWac Vrede Solar Energy Facility (SEF), Battery Energy Storage System (BESS) and associated infrastructure located on Farm Vrede, No. 1152, Remaining Extent; Farm Gesukkel, No. 1153, Remaining Extent; Farm Geduld No. 1156, Remaining Extent in the Moqhaka Local Municipality (Fezile Dabi District) of the Free State Province.

A Draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act (NEMA; No. 107 1998) and the 2014 NEMA EIA Regulations. The Electrical Grid Infrastructure includes a 132kV overhead powerline and 33/132kV onsite substation. Two alternative corridors with varying widths of up to 400m in diameter and lengths from 3.12km to 3.47km. Associated infrastructure and equipment include roads, buildings temporary and permanent laydown areas.

CTS Heritage was appointed to provide the heritage specialist reports as part of the EA process as required in terms of section 24(4)b(iii) of NEMA and in terms of section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Lavin, J. 2020. Heritage Impact Assessment In terms of Section 38(8) of the NHRA for the Proposed



an agency of the
Department of Arts and Culture

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development of a Grid Connection for the proposed Vrede Solar Energy Facility near Kroonstad, Free State Province

The area proposed for the development of the Vrede Solar Energy facility grid connection has been disturbed through previous agricultural activities and no cultural heritage remains were identified within either of the proposed grid connection alignments. EGI Option 2 is aligned along an existing gravel road and as such, this alignment option is preferred in terms of potential impacts to archaeological resources.

The development area is underlain by sediments of the Karoo Supergroup including the Adelaide Subgroup (Pa) as well as Jurassic Dolerite (Jd) intrusions and Quaternary Sands. The Adelaide formation forms part of the Dicynodon and Lystrosaurus assemblage zones and is known to include fossils of fish, amphibians, reptiles, therapsids and vertebrate burrows. Diverse terrestrial and freshwater tetrapods of Pristerognathus to Dicynodon Assemblage Zones have been found in this formation, as well as, palaeoniscoid fish, freshwater bivalves, trace fossils, sparse to rich assemblages of vascular plants and insects. No fresh fossil bearing outcrop was identified within either proposed alignment.

Recommendations

There is no objection to the proposed development on heritage grounds on condition that:

- The southern alignment (EGI Option 2) is preferred.
- All excavations into bedrock are monitored by a suitably qualified palaeontologist and a report on the outcomes of the monitoring activities must be submitted to SAHRA on completion of the development of the facility.
- All other excavation activities are subject to the Palaeontological Chance Finds Procedure.
- Should any previously unrecorded archaeological resources or possible burials be identified during the course of construction activities, work must cease in the immediate vicinity of the find, and SAHRA must be contacted regarding an appropriate way forward.

Lavin, J and Stratford, D. 2020. Archaeological Impact Assessment In terms of Section 38(8) of the NHRA for the Proposed development of a Grid Connection for the proposed Vrede Solar Energy Facility near Kroonstad, Free State Province

The Vrede property has been utilised for numerous farming activities over several generations and so the

Proposed development of a Grid Connection for the proposed Vrede Solar Energy Facility near Kroonstad, Free State Province

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
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Enquiries: Sityhilelo Ngcatsha
Tel: 0212028663
Email: sngcatsha@sahra.org.za
CaseID: 16942

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landscape has been heavily modified by this activity. no cultural heritage remains were identified on the property. However, there remains the possibility that cultural material may be present beneath the ground surface. Based on the assessment completed, the area proposed for the Vrede SEF and associated infrastructure has low archaeological sensitivity.

Chapelle, K. 2020. *Palaeontological Impact Assessment In terms of Section 38(8) of the NHRA for the Proposed development of a Grid Connection for the proposed Vrede Solar Energy Facility near Kroonstad, Free State Province*

The Vrede SEF and Grid Connections is underlain by sediments of the Karoo Supergroup including the Adelaide Subgroup as well as unfossiliferous Jurassic Dolerite intrusions and Quaternary Sands. The Adelaide formation forms part of the Dicynodon and Lystrosaurus assemblage zones and is known to include fossils of fish, amphibians, reptiles, therapsids and vertebrate burrows. No fresh fossil bearing outcrop was identified within either proposed alignment. A Chance Finds of Palaeontological Procedure has been attached to the report.

Recommendations

- All excavations into bedrock are monitored by a suitably qualified palaeontologist and a report on the outcomes of the monitoring activities must be submitted to SAHRA on completion of the development of the facility.
- All other excavation activities are subject to the Palaeontological Chance Finds Procedure (Appendix 1 of this report).

Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) has no objections to the authorised development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further

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additional specific conditions are provided for the development as follows;

- A monitoring report by a palaeontologist must be submitted upon completion of the construction phase that includes site clearance and excavations.
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Sityhilelo Ngcatsha/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA with regards to offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
- The Final BAR and EMPr with the conditions provided by SAHRA in this comment along with the Environmental Authorisation (EA) must be submitted to SAHRA for record purposes

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Sityhilelo Ngcatsha

Proposed development of a Grid Connection for the proposed Vrede Solar Energy Facility near Kroonstad, Free State Province

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Archaeology, Palaeontology, Meteorite Assistant
South African Heritage Resources Agency

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/579850>

Tumelo Mathulwe

From: Lizell Stroh <Strohl@caa.co.za>
Sent: Tuesday, 31 August, 2021 16:02
To: Savannah Public Process
Subject: RE: SE2716 - Vrede and Rondavel - BA Review
Attachments: Obstacle Surface Identification.pps; Solar Park footprint corners.xls; Pylon Geographic coordinates.xls

Find attached information for Developments around aerodromes and prescribed in SACAA Regulations, processes and procedures to follow towards Development where applicable for your comments.

Kindly follow the SACAA procedure and processes as per the website towards your proposed Solar Energy Facility.

<http://www.caa.co.za/Pages/Obstacles/Urgent-notice.aspx> please read the notices for extra information that is required, as well as fees applicable to the said application
<http://www.caa.co.za/Obstacles%20Forms/CA139-27.pdf> application form: apply one centre point co-ordinate, to the said proposed site

Kindly note that when the time for formal application comes, the client is required to provide the following together with the application

- A **kmz/kml (Google Earth) file reflecting the footprint to the proposed development site.**
- Provide coordinates, Height and Elevation as per excel spreadsheet attached herein
- Also indicate the **highest** structure of the project & the Overhead electric power transmission line

As published on SACAA website, should the site be outside of a 3km radius from an airport and not found to be on the on the approach and departure areas, then no Glint and Glare study would be required.

Should you require more information please contact the inspectorate at obstacles@caa.co.za

Kind regards



Lizell Stroh
Obstacle Inspector
PANS-OPS Section
Air Navigation Services Department
Tel: +27 11 545 1232 | **Mobile:** +27 083 461 6660
Email: Strohl@caa.co.za | www.caa.co.za

Foll us on    



“We spend most of our waking lives at work, so it's important that we do what we love and love what we do.”

Richard Branson

From: Savannah Public Process <publicprocess@savannahsa.com>

Sent: Tuesday, 31 August 2021 15:05

Subject: SE2716 - Vrede and Rondavel - BA Review

ELECTRICAL GRID INFRASTRUCTURE (EGI) FOR THE 100MWac VREDE AND 100MWac RONDAVEL PHOTOVOLTAIC (PV) SOLAR ENERGY FACILITIES, LOCATED NEAR KROONSTAD, FREE STATE PROVINCE

Dear Stakeholder and Interested & Affected Party,

Our notification letter dated 06 August 2021 in which you, as a registered Interested & Affected Party (I&AP) was informed that the Basic Assessment Reports are available for your review and comment, has reference.

This email serves to inform you that the review period and comment period is ending on **Monday, 06 September 2021.**

The Basic Assessment Reports are available for download from Savannah Environmental's website

We would like to thank those stakeholders and I&APs who submitted written comments and urge those who had not yet done so, to please submit your written comments before or on **Monday, 06 September 2021.**

Please do not hesitate to contact us should you require any additional information or clarification.

Kind Regards

savannah
environmental

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Tumelo Mathulwe
Public Participation Consultant

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SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

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