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Ecological Solutions for
People & the Environment

3Foxes Biodiversity Solutions
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ATT: Jo-Anne Thomas
Savannah Environmental

RE: 132kV power line associated with the Korana Solar Energy Facility near Pofadder, Northern Cape Province - Amendment Application

South Africa Mainstream Renewable Power Developments (Pty) Ltd (hereafter 'Mainstream') is proposing to amend the preferred grid connection alternative authorised for the grid connection infrastructure associated with the Korana Solar Energy Facility. Two grid alternatives were assessed in the BA process - Alternative 1A and Alternative 1B. Alternative 1A was Mainstream's preferred route due to the fact that it linked up with the other grid lines in the area and it did not go through another one of their projects in the area. However, Alternative 1B is the approved option as per the Environmental Authorisation (EA) issued. Mainstream are now requesting an amendment of the EA from Alternative 1B to Alternative 1A based on the above reasoning. The two grid routes are illustrated below in Figure 1. As this is considered a change in the scope of the EA, a Part 2 EA amendment process is required. As part of the above amendment process, Savannah Environmental has requested comment from 3Foxes Biodiversity Solutions regarding the potential terrestrial biodiversity implications of the proposed amendment.

Scope of the Amendment

In order to address the above proposed amendment to the authorised layout of the development, this amendment statement letter provides an evaluation of the ecological impacts associated with the development with regards to the following:

1. An assessment of all impacts related to the proposed change, including a comparison with those impacts predicted in the EIA.
2. Advantages and disadvantages associated with the proposed change
3. Measures to ensure avoidance, management and mitigation of impacts associated with the proposed change
4. Any changes to the EMP



Figure 1. Map showing the original layout of the grid connection infrastructure associated with the Korana Solar Energy Facility. The map includes Alternative 1B, which is the approved alternative, and Alternative 1A.

1. An assessment of all impacts related to the proposed change, including a comparison with those impacts predicted in the EIA

The two grid alternatives traverse a similar set of habitats and there are no significant differences in the ecological sensitivity of the affected habitats along each grid alternative. Alternative 1B is however approximately 600m longer than Alternative 1A. As such, the change in preferred alternative from Alternative 1B to Alternative 1A would not increase either the footprint of the development or the overall assessed impacts associated with the grid connection. In addition, there are not likely to be any new or novel impacts associated with the change in route alternative. The change in preferred alternative is not considered ecologically significant and would not represent a significant change from the original assessment development description. As such, there would not be any changes to the impacts as originally assessed.

2. Advantages and disadvantages associated with the proposed change

As the set of habitats affected and sensitivity of the two routes are similar, there are no significant advantages or disadvantages of the changes that would affect the impacts of the development as assessed. Although Alternative 1A is somewhat shorter than Alternative 1B and as such would potentially generate a lower overall ecological impact. The extent of this difference is not considered ecologically significant.

3. Measures to ensure avoidance, management and mitigation of impacts associated with the proposed change

The change to the grid route is located within the original assessed development footprint and would not result in any new, novel or increased impacts. As such, there are no additional changes to the mitigation and avoidance measures that were recommended in the original study. In addition, the cumulative impacts associated with the amendment are considered to be the same as those as assessed and thus there would be no changes to the overall cumulative impacts associated with the proposed amendment. All of the mitigation and avoidance measures as recommended in the EIA are held up by the current study and should be applicable to the amendment as well.

4. Any changes to the EMPr

There are no recommended changes to the EMPr and all of the mitigation and avoidance measures as recommended in the EIA are applicable to the proposed amendment.

Conclusions and Recommendations

The change in the preferred grid alternative for the Korana Solar Energy Facility from Alternative 1B to Alternative 1A can be supported from an ecological point of view as the change would not generate novel impacts or increase the severity of existing impacts associated with the Korana PV grid connection. No additional mitigation or avoidance measures, beyond those already recommended in the EIA study are required for the amendment. As such, there are no reasons to oppose the proposed amendment.

Sincerely

A handwritten signature in black ink, appearing to read 'Simon Todd', written in a cursive style.

Simon Todd
Director
3Foxes Biodiversity Solutions
