



FINAL MOTIVATION REPORT FOR THE AUTHORISED WESTERN CAPE WIND ENERGY FACILITY LOCATED SOUTHWEST OF THE TOWN OF SWELLENDAM, WESTERN CAPE PROVINCE

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OCTOBER 2024

APPLICABLE LEGISLATION NEMA EIA Regulations (2014, as amended) (National DFFE) Heritage Western Cape (HWC)	COMPETENT AUTHORITY REFERENCE NUMBER/S DFFE REF: 14/12/16/3/3/1/2437 DATED: 12 DECEMBER 2021 DFFE REF: 2024-08-0005 THIS APPLICATION 0112507AM1015E
Report Title	FINAL MOTIVATION REPORT FOR THE AUTHORISED WESTERN CAPE WIND ENERGY FACILITY, LOCATED SOUTHWEST OF THE TOWN OF SWELLENDAM, WESTERN CAPE PROVINCE
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Applicant	Western Cape Wind Farm (Pty) Ltd
Report Version	Final Motivation Report for Decision
Submission Date	15 October 2024

Purpose of this Document:

The Western Cape Wind Energy Facility (“WC WEF”), hereafter referred to as “The Project”, was recently authorised (DFFE Ref: 14/12/16/3/3/1/2437, dated 12 December 2021, the “EA”) to build and operate up to twenty-four (24) wind turbine generators (“WTGs”) and associated infrastructure over various cadastral units southwest of the Town of Swellendam, Western Cape Province. The WC WEF has also been selected as a Preferred Bidder in a tender submitted for a large industrial private off-taker and thus forms part of a private procurement programme in the Commercial and Industrial (C&I) sector. The Project, under a private Power Purchase Agreement (PPA) is intended to be ‘wheeled’ via the National Eskom Grid.

To ensure that commercial and contractual obligations are met, and in furtherance of the Conditions of the EA, specifically Condition 13 (final layout) and Conditions 14, 15 and 16 (EMPr finalisation and approval) as well as other enabling administrative amendments, Western Cape Wind Farm (Pty) Ltd (the Applicant) is required to undertake a Part 2 Amendment Application.

The Applicant underwent a very recent Part 2 Amendment Application process, however, due to administrative and engineering design challenges, the application was withdrawn in April 2024 to resolve. These matters have now been resolved and this Motivation Report is in furtherance of the requirements mentioned above.

Terramanzi Group (Pty) Ltd (“TMG”), has been appointed as the Independent Environmental Assessment Practitioner (“EAP”) to conduct the required process above in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) (as amended) (hereinafter referred to as the NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations (2014, as amended). This process will take place specifically, in terms of in terms of GN R. 982 (section 31), 983, 984 and 985 of the NEMA EIA Regulations (2014, as amended).

The amendments being applied for, and which form part of this Motivation Report and the overall Application for Amendment assessed by the Professional Team are as follows:

Non-Substantive Amendments (Administrative Amendments): these are amendments which are administrative only in nature

- Amendment 1: Change the EA holder and update the contact details of the Holder of the EA

Substantive Amendments: these are amendments which are considered a change in scope

- Amendment 1: Upgrade the technical specifications of the WTGs
- Amendment 2: Removal of any and all references to the Battery Energy Storage System (BESS) in the EA
- Amendment 3: Finalise the description of the main components of the WEF and associated infrastructure
- Amendment 4: Update the technical details table of the WEF and associated infrastructure
- Amendment 5: Update the coordinates of the WEF
- Amendment 6: Approve the final layout (dated 02 August 2024) in furtherance of Condition 13 of the EA
- Amendment 7: Approve the EMPrs per Conditions 14, 15 and 16 of the EA

Summary of Process to date and findings:

The Project as presented here has been assessed by the EAP and the Professional Team as part of this Amendment Application Process, in accordance with statutory requirements, to guide all final detailed design, build and operational considerations for the site. This includes revised specialist assessments and mapping exercises (sensitivity maps) which have ensured that the Project as presented here aligns with the recommendations of the Professional Team, and also includes updated and final mitigation measures attached (please refer to Section 7.2 of this report and specialist inputs in Appendix E) to inform the Environmental Management Programmes (“EMPrs”) for approval.

Based on the above, the proposed amendments presented above and within this report have been determined as **acceptable** and **implementable** by the EAP and the Professional Team accordingly.

Public Participation Process (PPP) for the Motivation Report:

As per the requirements of the NEMA EIA Regulations (2014, as amended) GNR 982, the Draft Motivation Report for Comment was released to relevant Stakeholders in terms of GNR 982, Regulation 41(2)(a)(b)(c)(d) in order to inform them of this proposed amendment to the Environmental Authorisation for the WCWEF located in the Western Cape Province. The 30-day Public Participation Process (PPP) commences on **02 September 2024** and concludes on **02 October 2024**.

All comments received during the public consultation processes were recorded and addressed in the Final Motivation Report which has been submitted to the National Department of Forestry Fisheries and the Environment (DFFE) for Decision who is the Competent Authority for this application process.

The Draft Motivation Report was made available electronically at the following hyperlink from **02 September 2024** up to and including **02 October 2024** for comment:

- <https://terramanzi.egnyte.com/fl/RI3ioqvleY>

Summary of What the Motivation Report Entails and Details:

- Details of the Environmental Assessment Practitioner (EAP);
- Location of the authorised activity and proposed amendments;
- Plan which locates the activity as authorised and activities applied for at an appropriate scale;
- Description of the authorised activity and amendments applied for;
- Assessment of all impacts related to the proposed amendments;
- The need and desirability for the project;
- Description of the public consultation process followed;
- An Environmental Impact Assessment;
- An Environmental Management Programme (EMPr); and
- Undertakings under oath or affirmation by the Environmental Assessment Practitioner (EAP)

All comments must be submitted directly to Terramanzi Group (Pty) Ltd, the “EAP”, as follows:

- Electronic mail: comments@terramanzi.co.za; or
- Post: Postnet Suite 211, Private Bag X26, Tokai, Cape Town, 7966
- For Attention: C/O Ludwig van der Merwe
- Tel no: (021) 701 5228
- Visit us at www.terramanzi.co.za

PLEASE USE THE FOLLOWING AS A REFERENCE FOR THIS REPORT:

**TERRAMANZI PROJECT # 240602 – DRAFT MOTIVATION REPORT FOR PUBLIC CONSULTATION FOR THE WESTERN CAPE
WIND ENERGY FACILITY**

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- b) Avifaunal – Chris van Rooyen Consulting (C/O Chris van Rooyen)
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- d) Ecological – Nick Helme Botanical Surveys (C/O Nick Helme)
- e) Freshwater – BlueScience (C/O Toni Belcher)
- f) Heritage – CTS (C/O Jenna Lavin)
- g) Noise – dBAcoustics (C/O Barend van der Merwe)
- h) Social – Multipurpose Business Solutions (C/O Jonathan Bloom)
- i) Traffic – ITS (C/O Christoff Krogscheepers)
- j) Visual – Environmental Planning and Design (C/O Jon Marshal)

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- b) Avifaunal Impact – Enviro-Insight (C/O Luke Verburgt)
- c) Bat Impact – Enviro-Insight (C/O Luke Verburgt)
- d) Ecological and Botanical Impact – Nick Helme Botanical Surveys (C/O Nick Helme)
- e) Freshwater – SAS Environmental (C/O Stephen van Staden)

- f) Heritage Impact– PGS Heritage (C/O Wouter Fourie)
- g) Social Impact – Tony Barbour (C/O Tony Barbour)
- h) Visual Impact – Environmental planning and Design (C/O Jon Marshall)
- i) Traffic Impact – ITS (C/O Pieter Arangie)
- j) Noise Impact – dBAcoustic – (C/O Barend vd Merwe)

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- a) 2024-08-0005 – Western Cape WEF – Pre-Application Reference Form correspondence – August 2024

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- b) Fabio Venturi – Concise CV – 2024
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1 INTRODUCTION

1.1 EXECUTIVE SUMMARY

The Western Cape Wind Energy Facility (“WCWEF”), hereafter referred to as “The Project”, was approved on 12 December 2021 (DFFE Ref:14/12/16/3/3/1/2437) and is to be located Southwest of the town of Swellendam within the jurisdiction of the Overberg District Municipality, in the Western Cape Province (Figure 1.1 below).

WCWEF is located within a **Renewable Energy Development Zone (REDZ)**¹, specifically the Overberg REDZ (please refer to Figure 1.2 below), which dictated that the original permitting process for the WEF was subject to a Basic Assessment Process (“BAR”) and not a full Scoping and EIA (S&EIA) process, which is typically the case. This REDZ qualification also allows for a shortened decision-making timeframe of **57 calendar days** (instead of 107 days). The reasoning of the shortened timeframe is that the REDZ² are strategically designed and demarcated by the Competent Authority to encourage this type of development in these specific areas for a range of strategic considerations. The layout that was assessed with the BAR process on 12 December 2021 is presented in Figure 1.3 below.

Western Cape Wind Farm (Pty) Ltd has been selected as the **Preferred Bidder**³ in a tender submitted for a large industrial private off-taker. The project thus forms part of a private procurement programme in the commercial and industrial (C&I) sector⁴. The project, under a private Power Purchase Agreement (PPA) will contribute electricity, which is intended to be 'wheeled' ⁵via the National Eskom Grid

The Project will Contribute to South Africa’s overarching goal of sustainable development through promoting a greener economy, improving access to critical resources and developing a greater network of essential infrastructure in places where it is most needed.

To ensure that **commercial and contractual obligations** are met, and in furtherance of the Conditions of the EA, specifically Condition 13 (final layout) and Conditions 14, 15 and 16 (EMPr finalisation and approval) as well as other enabling administrative amendments, the Applicant is required to undertake a Part 2 Amendment Application.

The Applicant underwent a very recent Part 2 Amendment Application process, however, due to administrative and engineering design challenges, the application was withdrawn in April 2024 to resolve. These matters have now been resolved and this Motivation Report is in furtherance of the requirements mentioned above.

¹ A Strategic Environmental Assessment (SEA) was completed for Southern Africa for the identification of Renewable Energy Development Zones (REDZs) for the development of potential wind and solar projects, which would be of national strategic importance in terms of green energy in support of the country’s electrical demand and economy. The proposed development is located entirely within the Overberg Renewable Energy Development Zone (REDZ) (namely REDZ 1), as defined and in terms of the procedures laid out in Government Notices No. 113 and No. 145 which were formally gazetted on 16 February 2018 and 26 February 2021, respectively.

² On 16 February 2018, Minister Edna Molewa published Government Notice No. 114 in Government Gazette No. 41445 which identified 8 renewable energy development zones important for the development of large scale wind and solar photovoltaic facilities. The Government Notice included procedure to be followed when applying for environmental authorisation for large scale wind and solar photovoltaic energy facilities when occurring in these REDZs.

On 26 February 2021, Minister Barbara Dallas Creedy, published Government Notice No. 142, 144 and 145 in Government Gazette No. 44191 which identified 3 additional REDZs for implementation as well as the procedures to be followed when applying for environmental authorisation for electricity transmission or distribution infrastructure or large scale wind and solar photovoltaic energy facilities in these REDZs. The REDZs were identified through the undertaking of 2 Strategic Environmental Assessments, the first being finalised in 2015 and the second being finalised in 2019.

³ This means that Western Cape Wind Farm (Pty) Ltd has been chosen as the preferred choice among the bidders in a tender process. In the context of renewable energy projects, being the preferred bidder indicates that the company is likely to be awarded the contract for the project.

⁴ The project is part of a private procurement program, indicating that it is not a government-led initiative but rather a private-sector-driven effort. It specifically targets the commercial and industrial sector (C&I), suggesting that the electricity generated will cater to the needs of businesses in these sectors.

⁵ The electricity generated by the wind farm will be fed into the National Eskom Grid. Eskom is the state-owned electricity supplier in South Africa, and “wheeled” here means that the electricity will be transmitted or transported through the national grid to reach the off-taker.

The amendments being applied for, and which form part of this Motivation Report and the overall Application for Amendment assessed by the Professional Team are Non-Substantive Amendments which are administrative only in nature and Substantive Amendments which are considered a change in scope. These amendments are discussed in detail within Section 3 of this Motivation Report.

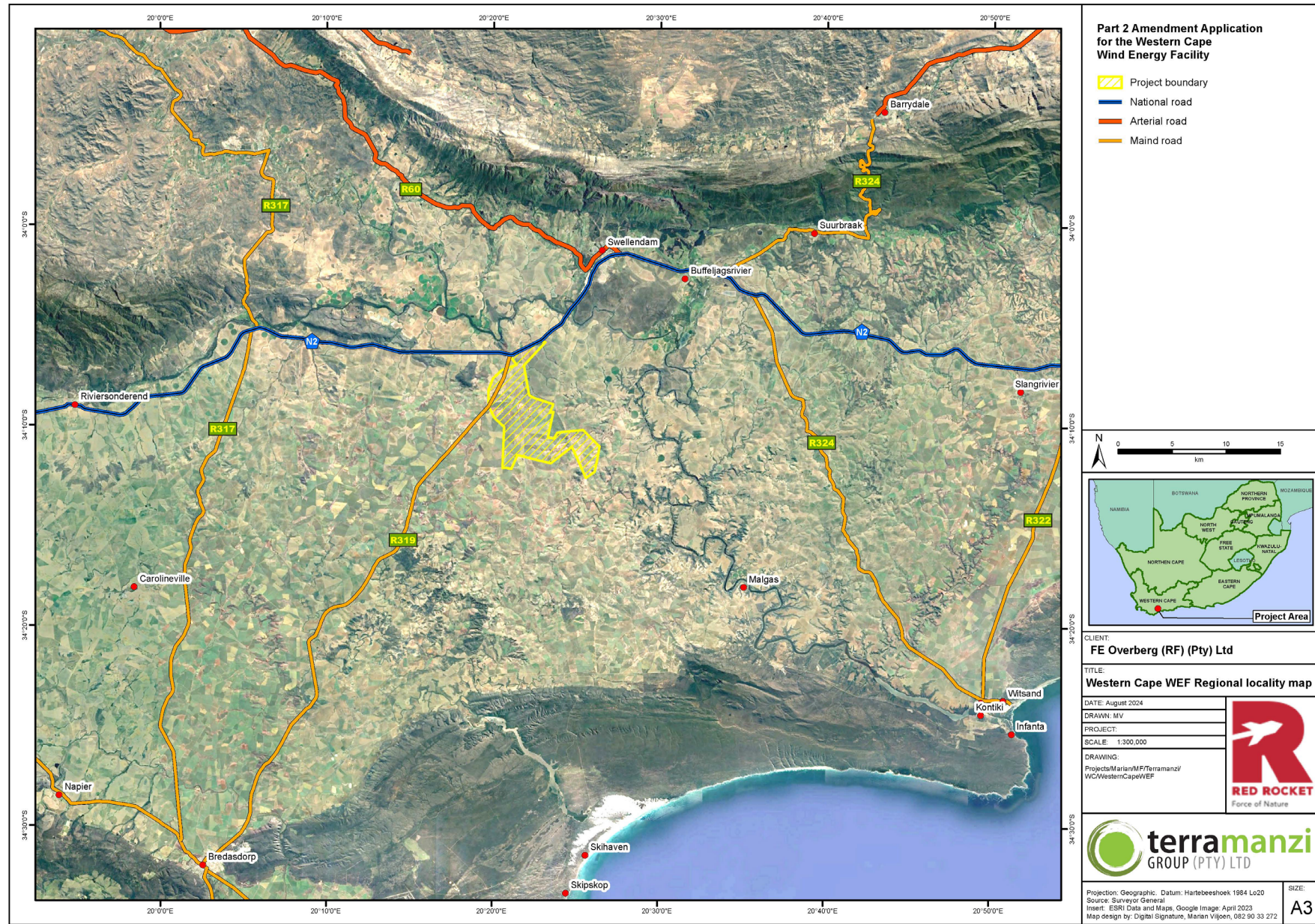


Figure 1.1. Regional Locality Map of the Western Cape Wind Energy Facility.

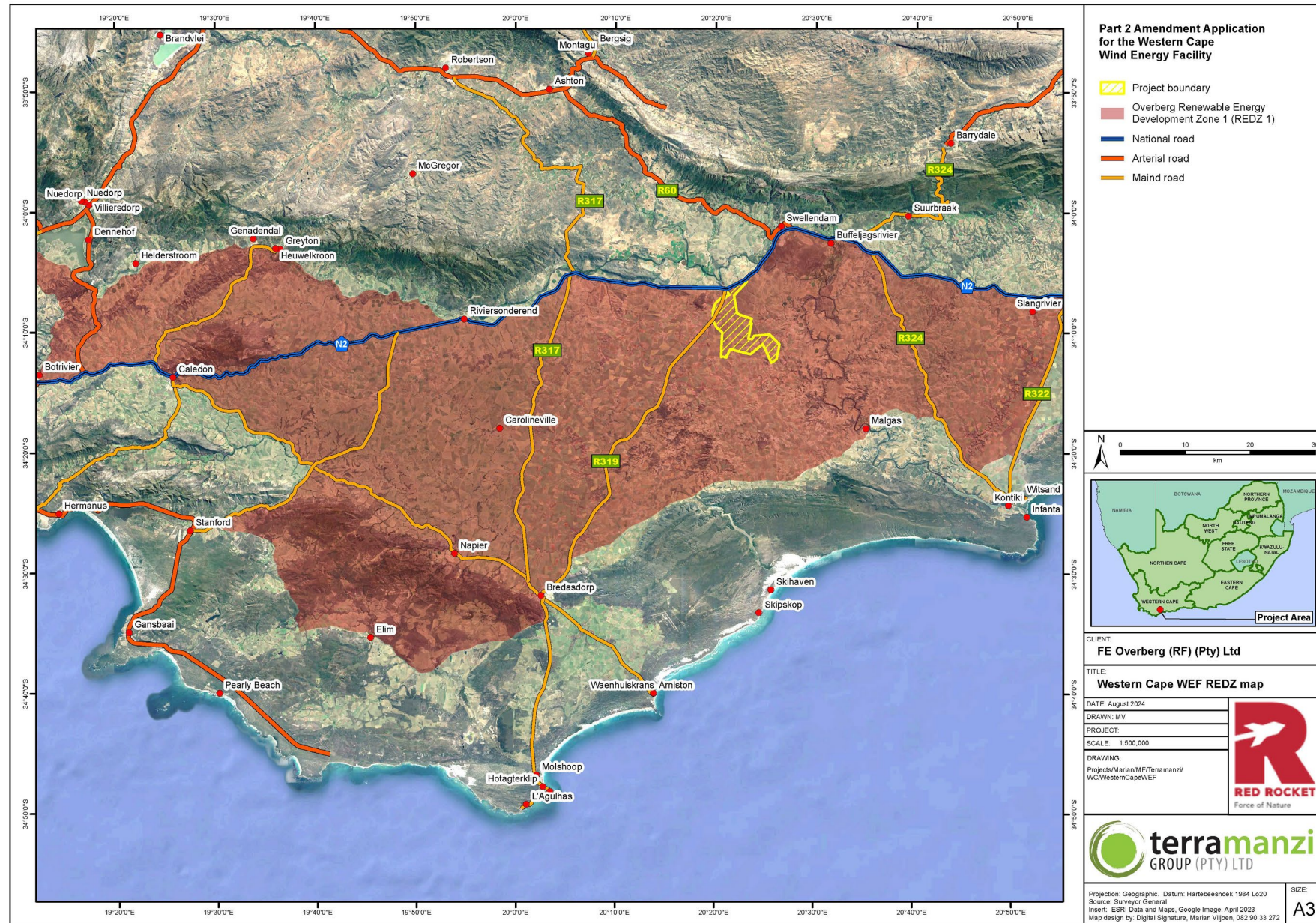


Figure 1.2. Western Cape Wind Energy Facility (indicated in yellow) falls within the Overberg REDZ1 (indicated in red)

With the proposed amendments (as discussed within Section 3.1 of this Report) the below main components will be updated within the EA to **align with the final layout design (dated 02 August 2024) for approval and implementation.**

The main components of the **authorised** WEF and associated infrastructure includes *inter alia*:

1. *“Up to 24 WTGs with a total output of 140MW*
2. *Generation capacity of up to 5.6MW each*
3. *Each WTG will consist of a transformer, steel tower, hub, nacelle (gear box}, and three rotor blades*
4. *Tower height of up to 120m*
5. *Total height up to 200m*
6. *Battery Energy Storage Systems (BESS) associated with the WEF*
7. *24 concrete foundations to support the turbine towers (15m x 15m x 2.5m in depth)*
8. *24 temporary-turbine laydown areas of 80m x 30m (57 600m²)*
9. *A 132kV substation with high voltage (HV) yard footprint of approximately 100m x 100m (1000m²)*
10. *Underground cabling between the WEF's components following existing roads*
11. *Two 132kV Overhead Powerline (OHPL) options connecting the WEF to an existing ESKOM network grid”*
12. *Internal access roads (10m wide and 40km long) linking the wind turbines and the infrastructure on the site*
13. *Operations and maintenance building including a storage facility with a footprint of 40m x 20m (800m²) for maintenance and storage purposes”*

This Report assessed the potential impacts that the **proposed amendments** (as described in Section 3.1 of this Report) may have on the receiving environment and takes into consideration the original impact assessment (2021), the recent specialist assessments (dated November 2023) for the withdrawn application, and the revised specialist assessments (2024) in the context of the amendments applied for. The EAP and specialists have assessed the impacts of all the proposed amendments especially the substantive amendments which have ultimately guided the **final technical design phase to produce the final layout (dated 02 August 2024) for approval** and as presented in Figure 1.4 below. Specialists have provided additional mitigation measures where applicable, which have also been used to inform the Facility EMPs and the Generic EMPs (OHPL and Substation). The EMPs will be submitted **for approval** as part of this Part 2 Amendment Application Process (please refer to Appendix D of this Report).

The EAP can confirm that all specialists were provided with the same request of proposed amendments. The EAP appointed the specialists to review the original specialist assessment reports that accompanied the Basic Assessment Report (BAR) submitted in October 2021 and the recent specialist assessments (dated November 2023) for the withdrawn application. This review was extended to encompass and assess all proposed amendments, with also an emphasis on the final layout design (dated 02 August 2024) and to inform the compilation of the Environmental Management Programmes (EMPs) for approval. Specialist assessments were **crucial to identify and evaluate potential impacts** within their respective areas of expertise associated with the proposed amendments and provide **guidance to the final layout design** and any additional mitigation measures.

Original Assessment Reports (2021)

- *Agricultural Assessment – Agri Informatics Development Trust (C/O Francois Knight, July 2021)*
- *Avifaunal – Chris van Rooyen Consulting (C/O Chris van Rooyen, July 2021)*
- *Bat – Arcus Consultancy Services South Africa (Pty) Ltd (C/O Ashlin Bodasig, November 2021)*
- *Ecological – Nick Helme Botanical Surveys (C/O Nick Helme, July 2021)*
- *Freshwater – BlueScience (Pty) Ltd (C/O Toni Belcher, July 2021)*
- *Heritage – CTS Heritage (C/O Jenna Lavin, August 2021)*
- *Noise – dBAcoustics (C/O Barend van der Merwe, July 2021)*
- *Social – Multipurpose Business Solutions (C/O Jonathan Bloom; July 2021, updated October 2021)*
- *Traffic – Innovative Transport Solutions (C/O Christoff Krogscheepers, July 2021)*
- *Visual – Environmental Planning and Design (C/O Jon Marshal, July 2021)*

Assessment Reports (2024)

- *Agricultural Impact – Agri Informatics Development Trust (C/O Francois Knight, August 2024)*
- *Avifaunal Impact – Enviro-Insight CC (C/O Luke Verburgt, August 2024)*
- *Bat Impact – Enviro-Insight (C/O Luke Verburgt, 2023August 2024)*
- *Ecological and Botanical Impact – Nick Helme Botanical Surveys (C/O Nick Helme, 2023August 2024)*
- *Freshwater – SAS Environmental (C/O Stephen van Staden, 2023August 2024)*
- *Heritage Impact– PGS Heritage (C/O Wouter Fourie, August 2024)*
- *Social Impact – Tony Barbour Environmental Consulting (C/O Tony Barbour, August 2024)*
- *Visual Impact – Environmental planning and Design (C/O Jon Marshall, August 2024)*
- *Traffic Impact – Innovative Transport Solutions (C/O Pieter Arangie, August 2024)*
- *Noise Impact – dBAcoustic – (C/O Barend vd Merwe, August 2024)*

The Professional Team have concluded that the amendments **will not result in any new negative impacts**, provided the updated specialist recommendations and mitigation measures (where applicable) detailed in this Report (section7.1) and the EMPs (Appendix D) are implemented. Additionally, the amendments **will not increase the significance of the previously assessed negative impacts** therefore **ensuring that the proposed amendments remain within the impact thresholds previously assessed and authorised by the Competent Authority**.

Based on the findings the revised final layout and its components (dated 02 August 2024) have been **determined as acceptable and implementable by the EAP and the Professional Team** and the **EAP finds no reason, based on the available information, why the applied-for amendments should not be authorised by the Competent Authority**.

Public Participation

In terms of Regulation 32 (1)(a), of the NEMA EIA Regulations (2014, as amended) this Report will be subjected to public consultation in line with Regulation 41 (as discussed in Section 10 of this report). This Draft Motivation Report must be subjected to a public consultation process, which will commence on **02 September 2024** and conclude on **02 October 2024**, inclusive.

All comments will be recorded and addressed as part of the Final Motivation Report for Decision for submission to the Competent Authority, the National Department of Fisheries, Forestry and Environment (the “DFFE”). We look forward to your valued participation.

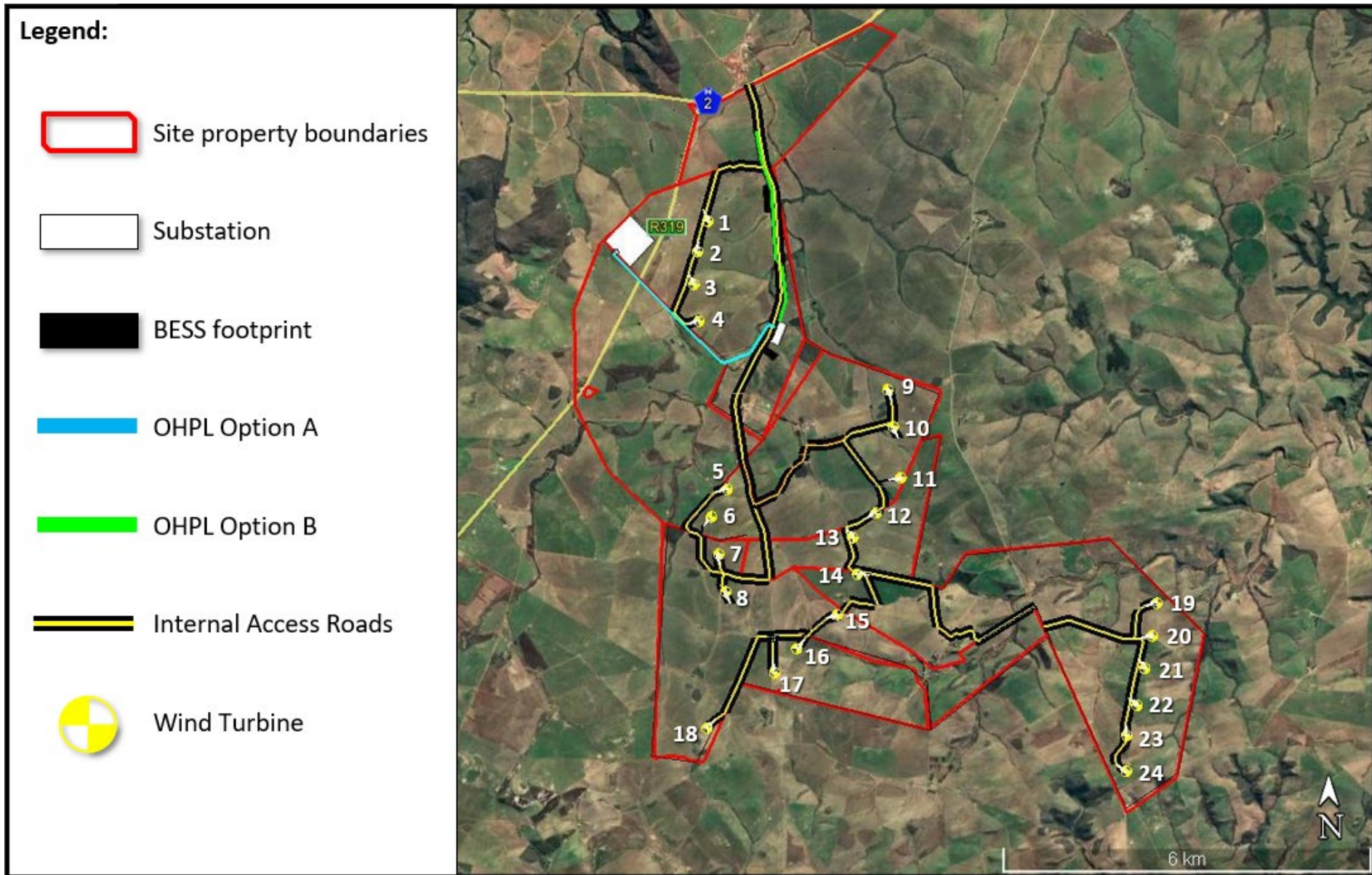


Figure 1.3. Western Cape Wind Energy Facility development footprint and layout as assessed as part of the Basic Assessment (October 2021).

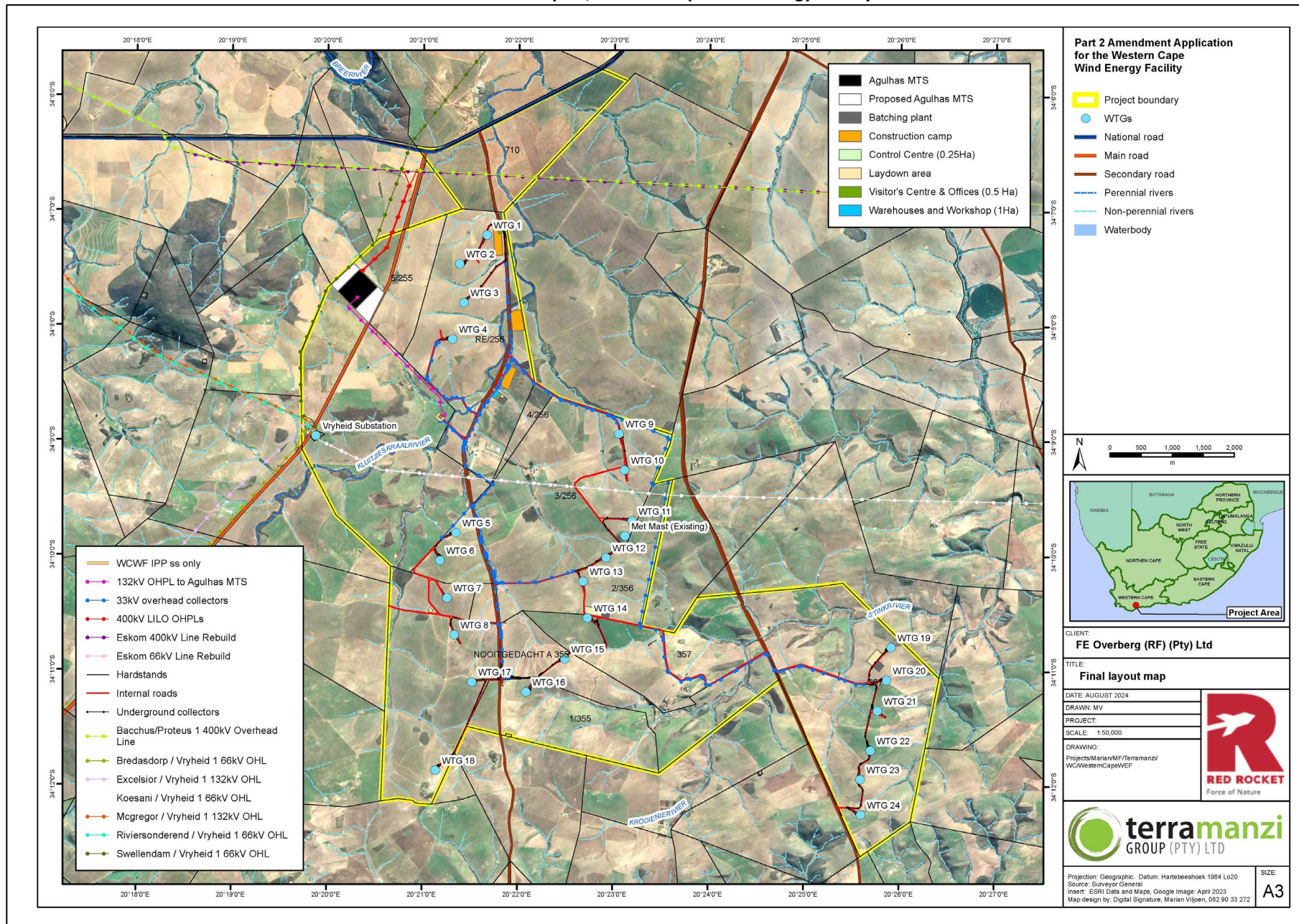


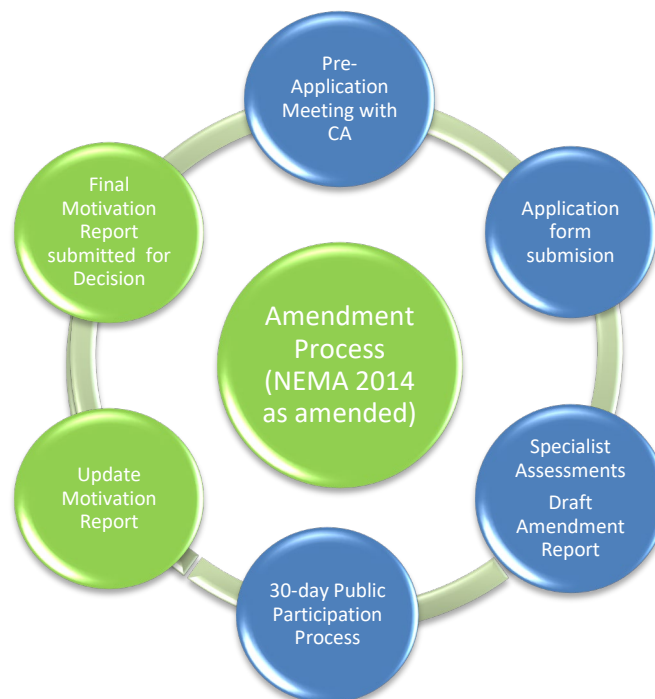
Figure 1.4. Final site layout plan for the Western Cape Wind Energy Facility, substation and all associated infrastructure (dated 02 August 2024)

1.2 ENVIRONMENTAL APPLICATIONS RELATED TO THIS PROJECT

COMPETENT AUTHORITY REFERENCE NUMBER	COMPETENT AUTHORITY	PURPOSE OF APPLICATION
An Environmental Authorisation (EA) (DFFE Ref: 14/12/16/3/3/1/2437– dated 12 December 2021)	National Department of Environmental Affairs	DFFE has approved a development footprint for the WCWEF which includes 24 turbines with associated infrastructure, and internal access roads of up to 10m wide and 40km long
Application for Amendment of EA with reference number: 14/12/16/3/3/1/2437/AM1	Department of Forestry, Fisheries and the Environment ("DFFE")	<i>This application</i>

1.3 BRIEF OVERVIEW OF THE PROCESS

The **Amendment Application Process** can be broadly broken down into the following key phases. The process proposed is in keeping with the requirements stipulated in the EIA Regulations (GN R. 982 of 2014, as amended) refer:



The phases highlighted in blue are currently underway. The phases highlighted in green illustrate the phases still to be completed. The process is aligned with the requirements stipulated in the NEMA EIA Regulations (2014, as amended). The application requirements as set out in Notice No.'s R. 982, R. 983, R. 984 and R. 985, promulgated in terms of Section 5 of the National Environmental Management Act (Act 107 of 1998) (as amended) and the requirements of DFFE have been followed in the preparation of this Report.

1.4 MOTIVATION REPORT CONTENT

This document contains all information which is necessary for an appropriate understanding of The Project. It describes the scope of the assessment and the consultation process that is being undertaken throughout the permitting process.

In terms of Section 32 of GN. R 982 (as amended), an Amendment Report, must include the information as specified in Table 1.1 below.

Table 1.1. Contents of this Final Motivation Report and where to locate these.

REGULATION		SCOPE AND CONTENT	RELEVANT SECTIONS
GNR 982 R32		<i>The Applicant must submit within 90 days of the application for amendment, a report reflecting:</i>	
(1)(a)	(i)	<i>An assessment of all impacts related to the change;</i>	Section 7
	(ii)	<i>Advantages and disadvantages associated with the proposed change;</i>	Section 3.2 and 11
	(iii)	<i>Measures to ensure avoidance, management and mitigation of impacts associated with such proposed change; and</i>	Sections 7 and 9
	(iv)	<i>Any changes to the EMPr</i>	Section 9
		<i>which report -</i>	
		<i>(aa) had been subjected to a PPP process which had been agreed to by the CA and which was appropriate to bring the proposed change to the attention of potential and registered I&APs including organs of state which have jurisdiction in respect of any aspect of the relevant activity and the CA, and</i>	Section 10 & Appendix C
		<i>(bb) reflects the incorporation of comments received including any comments of the CA, or</i>	To be included in the Final Motivation Report
(1)(b)		<i>a notification in writing that the report will be submitted within 140 days of receipt of the application by the CA as significant changes have been made or significant new information has been added to the report which changes or information was not contained in the report consulted on during the initial PPP contemplated in sub regulation (1)(a) and that the revised report will be subjected to another PPP of at least 30 days.</i>	N/A

2 PROJECT DETAILS

2.1 ENTITY RESPONSIBLE FOR DEVELOPMENT OF THE PROJECT

Table 2.1. Details of the entity responsible for the development of Western Cape Wind Energy Facility (“WCWEF”).

DETAIL	DESCRIPTION
Applicant Name:	Western Cape Wind Farm (Pty) Ltd
Responsible Person:	Magdalena Logan
Address:	14th Floor, Pier Place Building Heerengracht Street Foreshore
Contact Details:	072 212 1531

2.2 ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP) AND EAP TEAM DETAILS, EXPERTISE AND INDEPENDENCE

In terms of NEMA (as amended), an independent Environmental Assessment Practitioner (EAP) must be appointed in terms of section 12 to 14 of the EIA Regulations. Terramanzi Group (Pty) Ltd (TMG) has been appointed to undertake this Application for Amendment of the Environmental Authorisation on behalf of the Applicant.

Ludwig van der Merwe is a Senior Environmental Consultant at the Terramanzi Group (Pty) Ltd who compiled this report. Ludwig holds a BSc (with Hons) in Conservation Ecology from the University of Stellenbosch and a Master of Environmental Management and Development from the Australian National University. He has experience doing environmental management, environmental compliance, water use license applications and specialist report writing. Ludwig is registered as a EAP (2020/2817) with the Environmental Assessment Practitioners Association of South Africa (EAPASA), a Natural Scientist in the field of Environmental Science (Pr.Sci.Nat) (133969) and is a member of the International Association for Impact Assessment (IAIAsa). Ludwig was assisted by the following Team members.

This Report was peer-reviewed by Fabio Venturi, whose career spans over 20 years in the industry, across both the government and private sectors of the green economy. Fabio’s entrepreneurial drive to innovate and influence has resulted in multiple industry firsts and awards. Fabio is an Accredited Professional with the GBCSA, a Certified Environmental Scientist, served on the South Africa Environmental Industry Body, that being the Western Cape Committee Branch of the South African Affiliate of the International Association for Impact Assessment (IAIAsa), and sat on the National Executive Committee (NEC) of IAIAsa, is a founding member of the Environmental Assessment Practitioner’s Association of South Africa (EAPASA, #2021/4088), and is a Certified Carbon Footprint Analyst and Energy Efficiency Auditor.

Tarryn Frankland is an Environmental Consultant for the Terramanzi Group (Pty) and holds a BSc Honours in Geography and Environmental Management, and an MSc in Environmental Science. She has accumulated experience in the fields of environmental management, health and safety, air quality and renewable energy. Tarryn is registered as a Candidate EAP (2022/6205) with the Environmental Assessment Practitioners Association of South Africa (EAPASA) and is a member of the International Association for Impact Assessment (IAIAsa).

Bryan Cloete is an Environmental Consultant for the Terramanzi Group (Pty) Ltd and holds a BSc (with Hons) in Biodiversity and Conservation Biology and an MSc in Biodiversity and Conservation Biodiversity. He has accumulated experience in the fields of environmental management, environmental compliance and specialist report writing. Bryan is registered as a Candidate EAP with the Environmental Assessment Practitioners Association of South Africa (EPASA) and is a member of the International Association for Impact Assessment (IAIAsa).

Ana Mosse is a Junior Environmental Consultant for the Terramanzi Group (Pty) Ltd and holds a Diploma in Environmental Management from the Cape Peninsula University of Technology (CPUT), with experience in field assessments, collecting and analysing data, environmental checklists and carbon footprint. Ana has worked in diverse projects aimed at sustainability, conservation and environmental stewardship and is a member of the International Association for Impact Assessment (IAIAsa).

Chane Olckers is Operations Manager for the Terramanzi Group (Pty) Ltd and holds a BSc in Law (LLB) from the University of South Africa (UNISA). Chane has experience with environmental authorisation applications, basic assessment reports, scoping and environmental impact assessment reports, environmental management programmes, executing the public participation process, environmental compliance audits, environmental control officer (ECO) services, environmental screening, due diligence assessments as per project specifications.

TMG hereby declares that they have no conflicts of interest related to the work of this Report. Specifically, TMG declares that they have no personal financial interests in the property and/or activity being assessed in this report, and that they have no personal or financial connections to the relevant property owners, developers, planners, financiers or consultants of the property or activity, other than fair remuneration for professional services rendered for this Report to the Competent Authority. TMG declares that the opinions expressed in this Report are independent and a true reflection of their professional expertise.

Please refer to Appendix G for the EAP's Curriculum Vitae

2.3 LOCATION OF ACTIVITY

The project is strategically positioned in the Western Cape Province of South Africa and located approximately 25km southwest of Swellendam, within the Swellendam Local Municipality. In terms of regional context, the proposed development site is located in a rural area where the predominant economic activity is sheep farming and grain cultivation. The towns of, Bredasdorp and Riviersonderend are within 50 km of the proposed development footprint.

This placement falls within the broader context of the Overberg District Municipality, over multiple cadastral units. The project integrates into the designated Overberg Renewable Energy Development Zone 1 ("REDZ1")⁶ as presented in Figure 2.2, further emphasising its significance in the regional and national renewable energy landscape.

For a precise understanding of the project's spatial location, refer to Figure 2.1 and to Table 2.2 for the coordinates of the authorised development footprint. The cadastral units that are authorised for this project are outlined in Table 2.3 and visually represented in Figure 3.3.

Table 2.2. Approximate coordinates of the currently authorised WEF.

	LATITUDE	LONGITUDE
Northern Boundary	34° 05'44.66"S	20°22'53.16"E
Eastern Boundary	34°11'05.33"S	20°26'26.06"E
Middle Point	34° 09'47.49"S	20°22'09.03"E
Southern Boundary	34°12'35.70"S	20°25'35.77"E
Western Boundary	34° 08'39.34"S	20°19'45.39"E

Table 2.3. Affected and authorised cadastral units of the project

PROPERTY NAME	SG21 DIGITAL CODE	FARM SIZE (HA)	MUNICIPALITY
Portion 3 of Farm Kluitjieskraal, 256	C07300000000025600003	713 Hectares	Swellendam Municipality
Remaining extent of Farm Kluitjieskraal, 256	C07300000000025600000	578 Hectares	Swellendam Municipality
Remaining extent of Portion 2 of Farm Kluitjieskraal, 256	C07300000000025600002	778 Hectares	Swellendam Municipality
Portion 4 of Farm Kluitjieskraal, 256	C07300000000025600004	32 Hectares	Swellendam Municipality
Portion 5 of Farm Kluitjieskraal, 256	C07300000000025600005	208 Hectares	Swellendam Municipality
Portion 2 of Farm Klein Croedinie, 356	C07300000000035600002	260 Hectares	Swellendam Municipality
Remaining extent of Farm Nooitgedacht A, 355	C07300000000035500000	810 Hectares	Swellendam Municipality

⁶ REDZ were designed through a National Strategic Environmental Assessment (SEA) process for the identification areas that were most suitable for the development of potential wind and solar projects, and which would be of national strategic importance in terms of renewable energy infrastructure development in support of the country's electrical demand and economy.

Portion 1 of Farm Nooitgedacht A, 355	C07300000000035500001	264 Hectares	Swellendam Municipality
Farm Burgerts dal, 357	C07300000000035700000	1128 Hectares	Swellendam Municipality
Farm Kluitjieskraal, 710	C07300000000071000000	349 Hectares	Swellendam Municipality

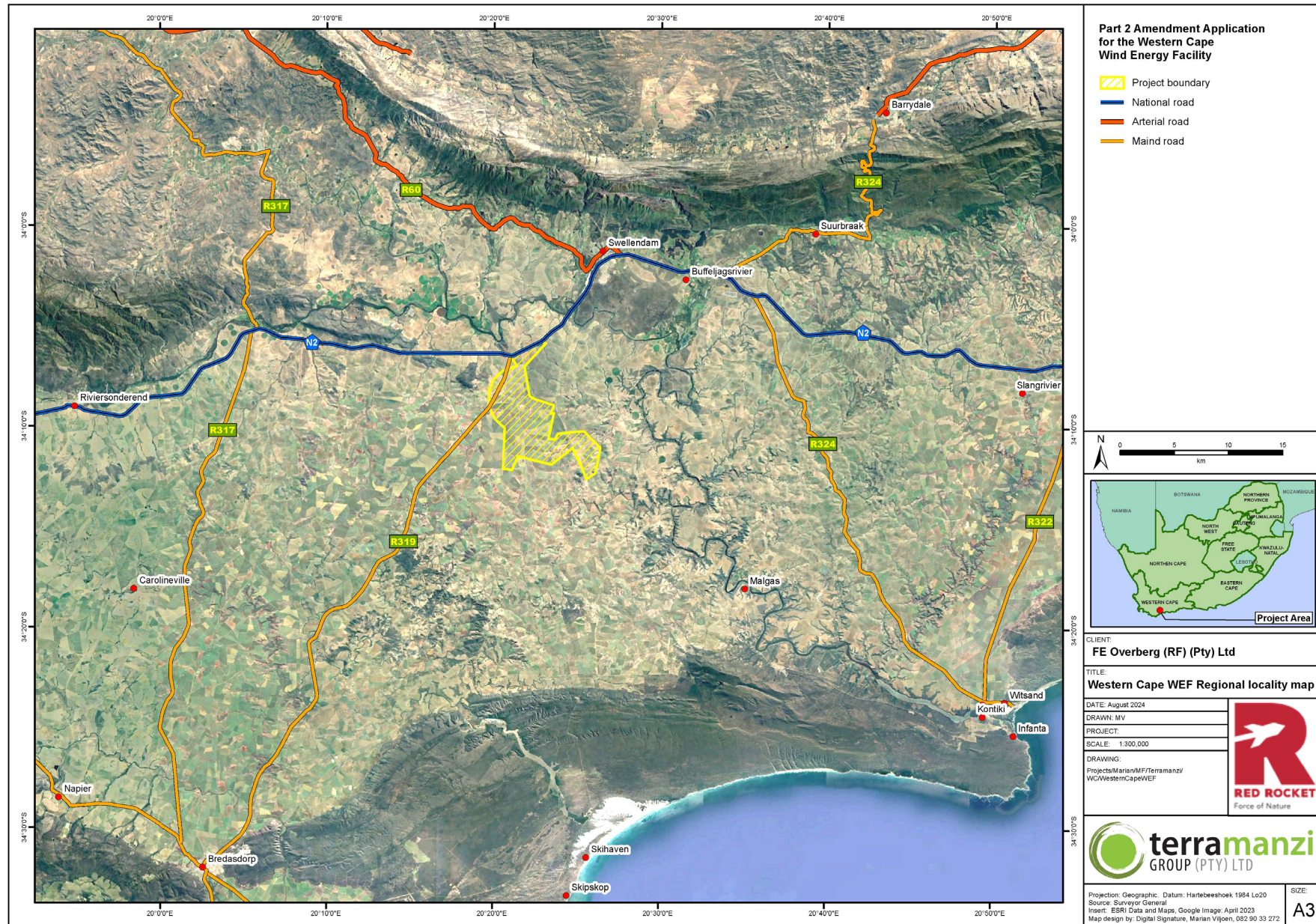


Figure 2.1. Regional Locality Map of the Western Cape Wind Energy Facility.

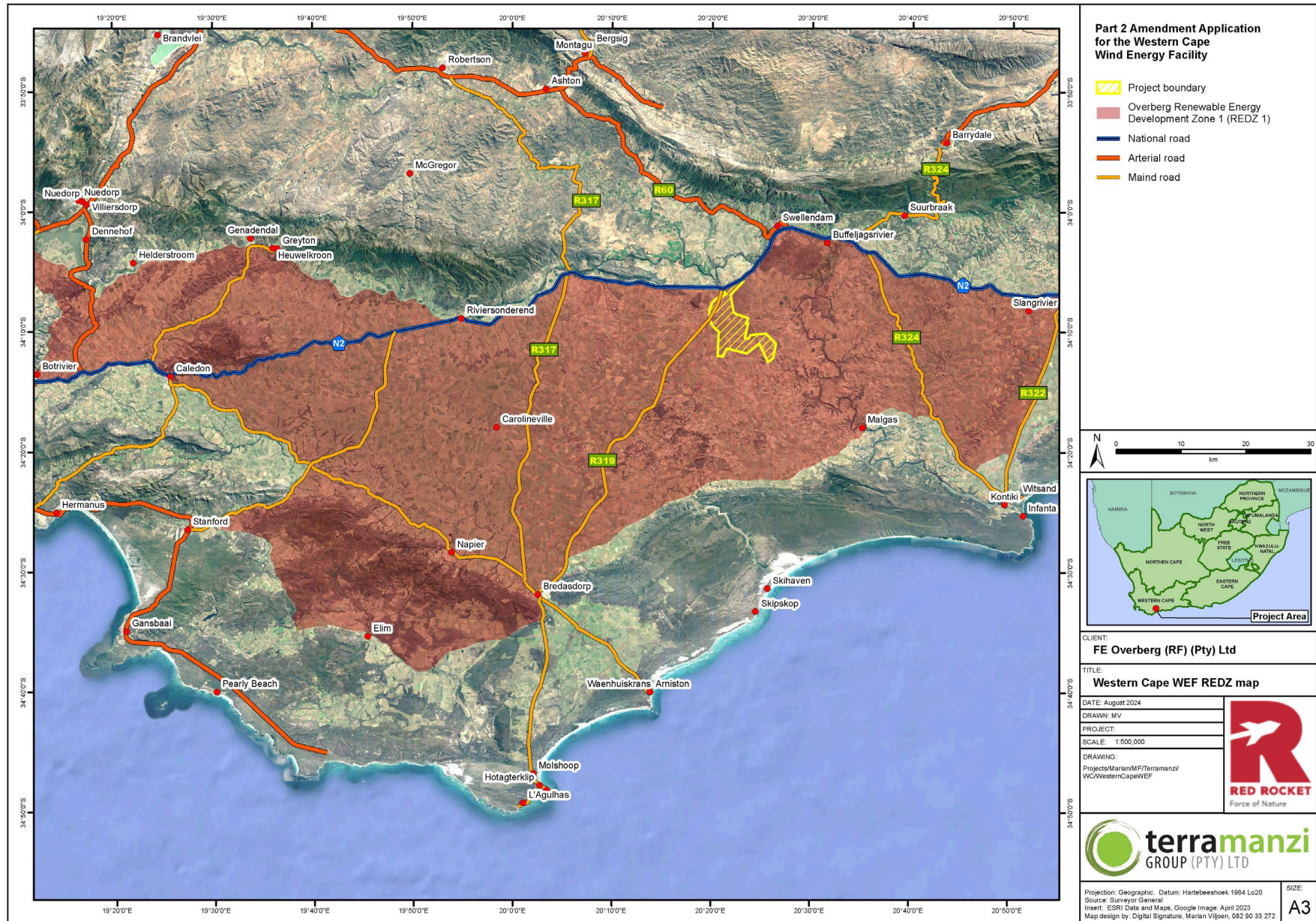


Figure 2.2. Western Cape Wind Energy Facility (indicated in yellow) falls within the Overberg REDZ1 (indicated in red).

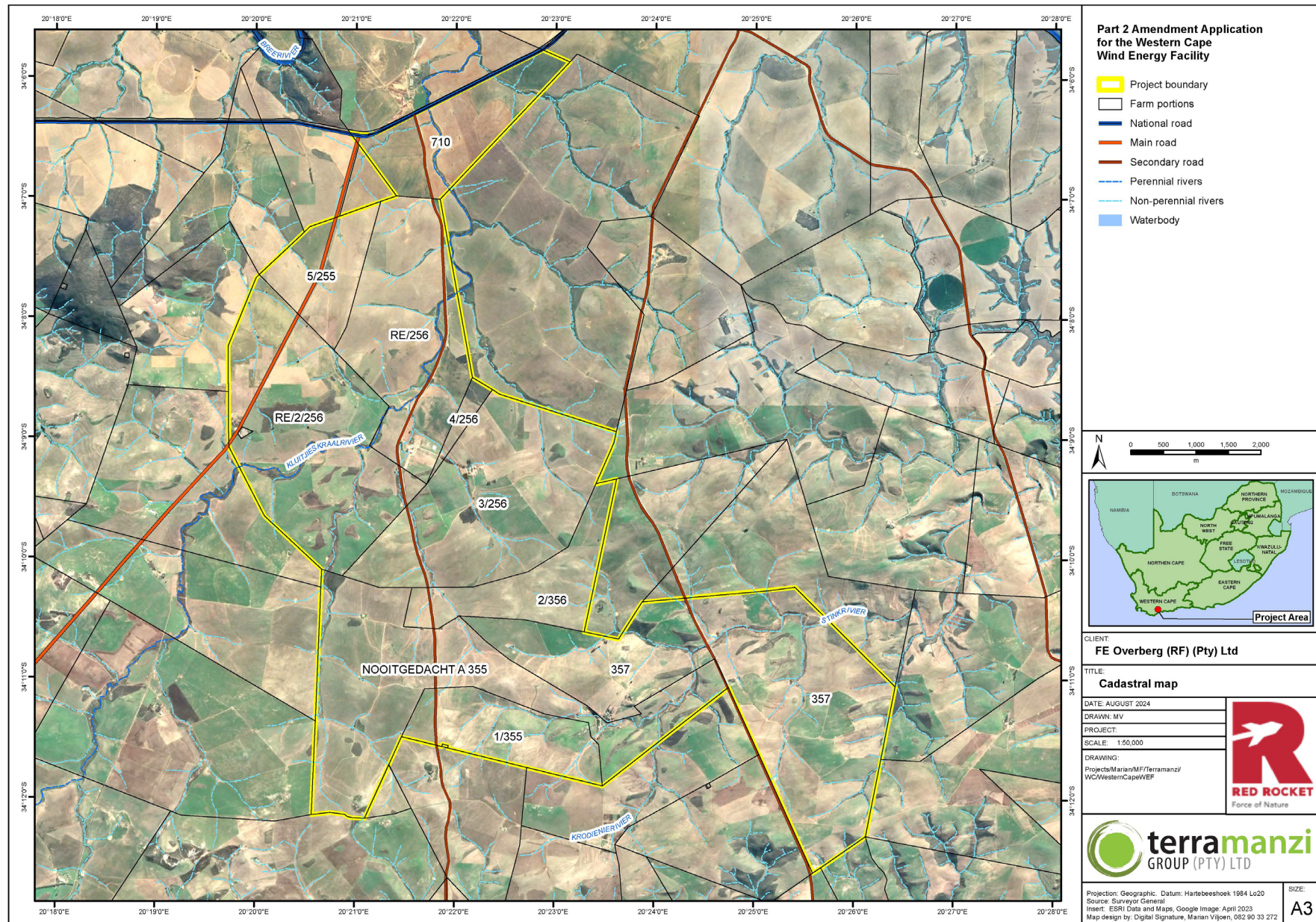


Figure 2.3. Cadastral map indicating authorised cadastral units

3 SCOPE OF THE PROPOSED AMENDMENT

NOTE FOR THE READER:

- "From" indicates current text in the EA which needs to be amended
- "To" indicates the amended text that replaces the current text indicated above
- ***Bold italics*** indicated the new text to be added to the EA
- A ~~strikethrough~~ indicates text to be removed from the EA

3.1 DESCRIPTION OF PROPOSED AMENDMENTS

3.1.1 Administrative Amendment 1: Change the EA holder and update the contact details of the Holder of the EA

Description of the Amendment: Change the EA holder and update the contact details of the holder of the EA on Page 2 of the EA⁷. With this update the EA holder "Western Cape Wind Farm (Pty) Ltd" should be changed to FE Overberg Ring-Fenced (RF) (Pty) Ltd.

Reason for the Amendment: Due to commercial agreements the roles and obligations of the EA must be ceded to FE Overberg Ring-Fenced (RF) (Pty) Ltd. The Amendment being applied for is of an administrative nature to update the EA holder and the contact details of the Holder of the EA to ensure that the information contained in the EA is up to date and accurate.

From:

~~"Jason Cope~~

~~Western Cape Wind Farm (Pty) Ltd~~

~~3 Devon Valley Way~~

~~Table View~~

~~Cape Town~~

~~8001~~

~~Cell Phone Number: 021 020 1044~~

~~Email Address: m.logan@redrocket.energy/jcope@veldren.co.za"~~

To:

Matteo Giulio Luigi Maria Brambilla

FE Overberg (RF) (Pty) Ltd

14th Floor, Pier Place Building

Heerengracht Street

Foreshore

CAPE TOWN

8001

Tel: 072 212 1531

Email: m.logan@redrocket.energy

⁷ Environmental Authorisation ("EA") dated 12 December 2021 DFFE Reference 14/12/16/3/3/1/2437

3.1.2 Substantive Amendment 1: Upgrade the technical specifications of the WTGs

Description of the Amendment: The technical specifications and references of the Wind Turbine Generators (“WTG”) as authorised within the EA will be upgraded.

Reason for the Amendment: The maximum generation output capacity of each WTG will increase from 5.2MW to 8.2MW, and the authorised total generation capacity of the Project will be increased from 140MW to 149.9MW. The WTGs will cumulatively account for the total authorised output and the authorised total generation capacity will not to be exceeded. These upgrades to the technical specifications of the Project are essential to ensure commercial, contractual obligations and which include alignment with the latest available technology and efficiencies. The scope of authorisation on Page 9 of the EA must be amended to reflect the above.

From:

Page 9 of the EA

Scope of authorisation

~~“1. The 140MW Western Cape Wind Energy Facility within the Swellendam Local Municipality in the Western Cape Province, as described above is hereby approved.”~~

To:

The 149.9MW Western Cape Wind Energy Facility within the Swellendam Local Municipality in the Western Cape Province, as described above is hereby approved.

3.1.3 Substantive Amendment 2: Removal of any and all references to the Battery Energy Storage System (BESS) in the EA

Description of the Amendment: Removal of any and all references to the Battery Energy Storage System (BESS) in the EA

Reason for the Amendment: The Holder of the EA wishes to remove all references to the BESS in the EA (pages 8, 9 and 11) as a BESS will not be used on site.

To facilitate this amendment, the description of the main components and technical detail table of the WEF will be updated and the final layout (without the BESS) will be submitted for approval, as outlined in Sections 3.1.4, 3.1.5 and 3.1.7.

3.1.4 Substantive Amendment 3: Finalise the description of the main components of the WEF and associated infrastructure

Description of the Amendment: To finalise the description of the main components of the WEF and associated infrastructure on page 8 of the EA.

Reason for the Amendment: Page 8 of the EA should indicate the revised description of the WEF and associated infrastructure to ensure that all infrastructure and technical details align with the final layout design dated (02 August 2024) and are included within the EA.

From:

~~“The facility will comprise of the following:~~

- ~~• Up to 24 WTGs with a total output of 140MW;~~
- ~~• Generation capacity of up to 5.6MW each;~~

- ~~Each WTG will consist of a transformer, steel tower, hub, nacelle (gear box), and three rotor blades;~~
- ~~Tower height of up to 120m;~~
- ~~Total height up to a max of 200m;~~
- ~~Battery Energy Storage Systems (BESS) associated with the WEF;~~
- ~~24 concrete foundations to support the turbine towers (15m x 15m x 2.5m in depth);~~
- ~~24 temporary turbine laydown areas of 80m x 30m (57 600m²);~~
- ~~A 132kV substation with high voltage (HV) yard footprint of approximately 100m x 100m (1000m²);~~
- ~~Underground cabling between the WEF's components following existing roads;~~
- ~~Two 132kV Overhead Powerline (OHPL) options connecting the WEF to an existing ESKOM network grid;~~
- ~~Internal access roads (10m wide and 40km long) linking the wind turbines and the infrastructure on the site; and~~
- ~~Operations and maintenance building including a storage facility with a footprint of 40m x 20m (800m²) for maintenance and storage purposes."~~

To:

The facility will comprise of the following:

- **Up to 24 WTGs**
- **Total Generation Capacity of up to 149.9MW**
- **Generation Capacity of up to up to 8.2MW each**
- **Each WTG will consist of a transformer, steel tower, hub, nacelle (gearbox), and three rotor blades**
- **Maximum hub height of up to 150m**
- **Rotor length of up to 100m**
- **A rotor diameter of up to 200m**
- **Ground Clearance (lower swept blade tip height) 40m**
- **A 33/132kV WCWF IPP on-site substation (0.7ha)**
- **Associated Balance of Plant Areas which will include:**
 - **i). Temporary laydown areas,**
 - **ii). Construction camps, laydowns, and temporary concrete batching plants**
 - **iii). Operation and Maintenance buildings which will include control centre, warehouses, workshops, visitor's centre and offices**
 - **iv). Concrete turbine foundations and turbine hardstands areas of up to 7500m²**
 - **v). 132kV overhead power lines which will facilitate the connection of the WEF to the National Eskom Grid at the planned Agulhas Main Transmission Substation (MTS) from the WC WEF IPP Sub Station**
 - **vi). Up to 33kV overhead or underground cabling between the turbines and substation, to be laid underground and along roads where technically feasible**
 - **vii). Access roads to the site and between project components with a width of up to 12m and a servitude of up to 20m. The main access points will be up to 12m wide.**
 - **viii). Perimeter fencing, fencing of all buildings and substation**

3.1.5 Substantive Amendment 4: Update the technical details table of the WEF and associated infrastructure

Description of the amendment: To update the technical details table of WEF and associated infrastructure on page 9 of the EA⁸.

Reason for the Amendment: There are technical details of the WEF and associated infrastructure to be updated within the EA to ensure that all infrastructure and technical details from the final layout dated (02 August 2024) is included within the EA.

From:

Component	Description/Dimensions
<i>Total number of WTG</i>	<i>24</i>
<i>WTG Rating</i>	<i>5.6MW</i>
<i>WTG Dimensions</i>	<i>Tower height: Up to 120m Total height: Up to 200m</i>
<i>Total WEF Generation Capacity (MW)</i>	<i>140MW</i>
<i>Temporary WTG laydown areas</i>	<i>24 (80m x 30m) (57 600m²)</i>
<i>Concrete support foundations</i>	<i>24 (15m x 15m x 2.5m in depth)</i>
<i>Transmission</i>	<i>132kV OHPL (2 options, dependent on Eskom future development plan)</i>
<i>Storage</i>	<i>2 BESS Options</i>
<i>Internal Access Road</i>	<i>10m wide and 40km long</i>
<i>Operations and maintenance building including a storage facility</i>	<i>40m x 20m (800m²)</i>

To:

Component	Description/Dimensions
Number of turbines	Up to 24
WTG Rating	Up to 8.2MW
Total Generation Capacity	Up to 149.9MW
Hub Height from ground	Up to 150m
Rotor Diameter	Up to 200m
WTG Technology	The final turbine model to be utilised will only be determined closer to the time of construction (depending on the technology available at the time).
Blade Length	Up to 100m
Turbine Hardstand and Laydown	A hardstanding area of up to 7500m² will be established adjacent to each turbine location. This will be used to provide a platform for cranes to operate during construction (and unscheduled maintenance), as well as a clear area to lay out turbine components prior to erection. The crane hardstanding will be left in place following construction to allow for use of

⁸ Environmental Authorisation ("EA") dated 12 December 2021 DFFE Reference 14/12/16/3/3/1/2437

	<i>similar plant should major components required to be serviced.</i>
Construction Camps and Laydown Area	<i>A total of four Construction Camps and Laydown Areas with a combined footprint of 20.5 hectares</i>
Temporary Laydown Area	<i>A total of two temporary Laydown Area with a combined footprint of 6.4 hectares</i>
Turbine Foundation	<i>Each turbine will have a circular foundation with a diameter of up to 30m, alongside the hardstand.</i>
Batching Plants	<i>A total of three batching plants with a combined footprint of 4.5 hectares (3 x 1.5ha)</i>
Cabling between the turbines	<i>Overhead and underground cabling (WTG Collectors) will be used to connect the WTGs to the WC IPP substation. The WTG Collectors will have a capacity of up to 33kV and will run alongside either side of access roads and existing reserves where possible. Underground cabling will be installed at a depth of up to 1.5m Where burying of cables is not possible (technical, geological, environmental, or topographical constraints) cables will be overhead via 33kV monopoles. WTGs Collectors must, as far as possible, remain outside natural vegetation remnants.</i>
Internal Access Roads	<i>Existing roads on the affected properties will be used where feasible and practical. The WEF will have internal access roads of up to 12m wide, with a servitude of up to 20m which will include additional space required for cut and fill, side drains and other stormwater control measures, turning areas and vertical and horizontal turning radii to ensure safe delivery of the WTG components. Internal roads will provide access to each turbine, the substation, all Operation and Maintenance buildings, and Balance of Plant areas</i>
Capacity and location of the WC WEF IPP Substation	<i>Up to 33/132kV substation, located adjacent to FE Overberg's FEO IPP Substation</i>
Development footprint of the Operation and Maintenance buildings and Balance of Plant areas	<i>Includes: Control centre, warehouses and workshops, and visitor's centre and offices</i> <i>Total development footprint: Up to 1.75 hectares</i>

3.1.6 Substantive Amendment 5: Update the coordinates of the WEF

Description of the amendment: To update the coordinates of the WTG's and associated infrastructure on pages 7 and 8 of the EA⁹.

Reason for the Amendment: The coordinates table on pages 7 and 8 of the EA must be updated as per the final layout design dated (02 August 2024). This is required to ensure the coordinates of the WEF Components are accurately indicated within the EA.

From:

POINT OF INTEREST	LATITUDE	LONGITUDE
WTG 1	34° 07' 29.05" S	20° 21' 08.58" E
WTG 2	34° 07' 44.52" S	20° 21' 01.96" E
WTG 3	34° 08' 01.64" S	20° 20' 59.59" E
WTG 4	34° 08' 20.94" S	20° 21' 02.98" E
WTG 5	34° 09' 48.28" S	20° 21' 20.99" E
WTG 6	34° 10' 02.72" S	20° 21' 10.99" E
WTG 7	34° 10' 22.19" S	20° 21' 15.49" E
WTG 8	34° 10' 41.64" S	20° 21' 20.04" E
WTG 9	34° 08' 56.56" S	20° 23' 03.21" E
WTG 10	34° 09' 15.62" S	20° 23' 06.71" E
WTG 11	34° 09' 42.25" S	20° 23' 11.56" E
WTG 12	34° 10' 00.80" S	20° 22' 55.58" E
WTG 13	34° 10' 13.52" S	20° 22' 40.97" E
WTG 14	34° 10' 32.57" S	20° 22' 43.79" E
WTG 15	34° 10' 53.45" S	20° 22' 31.00" E
WTG 16	34° 11' 11.30" S	20° 22' 05.25" E
WTG 17	34° 11' 23.88" S	20° 21' 51.22" E
WTG 18	34° 11' 52.75" S	20° 21' 08.03" E
WTG 19	34° 10' 47.51" S	20° 25' 54.80" E
WTG 20	34° 11' 04.62" S	20° 25' 51.87" E
WTG 21	34° 11' 21.56" S	20° 25' 47.01" E
WTG 22	34° 11' 40.91" S	20° 25' 42.13" E
WTG 23	34° 11' 56.48" S	20° 25' 35.61" E
WTG 24	34° 12' 15.18" S	20° 25' 35.25" E
BESS 1	34° 08' 27.59" S	20° 21' 53.38" E
BESS 2	34° 08' 37.41" S	20° 21' 48.00" E
OHPL 1 Start	34° 08' 23.44" S	20° 21' 51.31" E
OHPL 1 Middle	34° 08' 42.82" S	20° 21' 18.00" E
OHPL 1 End	34° 07' 45.00" S	20° 20' 09.39" E
OHPL 2 Start	34° 08' 20.42" S	20° 21' 54.24" E
OHPL 2 End	34° 07' 29.05" S	20° 21' 08.58" E
Substation	34° 06' 42.18" S	20° 21' 39.37" E

⁹ Environmental Authorisation ("EA") dated 12 December 2021 DFFE Reference 14/12/16/3/3/1/2437

To:

POINT OF INTEREST	LATITUDE	LONGITUDE
WTG 1	34° 7'12.92"S	20°21'40.01"E
WTG 2	34° 7'28.14"S	20°21'22.87"E
WTG 3	34° 7'48.36"S	20°21'25.57"E
WTG 4	34° 8'7.41"S	20°21'18.46"E
WTG 5	34° 9'48.28"S	20°21'20.99"E
WTG 6	34°10'2.72"S	20°21'10.99"E
WTG 7	34°10'22.19"S	20°21'15.49"E
WTG 8	34°10'41.64"S	20°21'20.04"E
WTG 9	34° 8'56.56"S	20°23'3.21"E
WTG 10	34° 9'15.31"S	20°23'6.80"E
WTG 11	34° 9'41.89"S	20°23'11.64"E
WTG 12	34°10'1.06"S	20°22'55.41"E
WTG 13	34°10'13.52"S	20°22'40.97"E
WTG 14	34°10'32.57"S	20°22'43.79"E
WTG 15	34°10'54.04"S	20°22'29.60"E
WTG 16	34°11'11.30"S	20°22'5.25"E
WTG 17	34°11'6.20"S	20°21'31.21"E
WTG 18	34°11'52.45"S	20°21'8.48"E
WTG 19	34°10'47.51"S	20°25'54.80"E
WTG 20	34°11'4.62"S	20°25'51.87"E
WTG 21	34°11'20.65"S	20°25'46.31"E
WTG 22	34°11'41.44"S	20°25'42.06"E
WTG 23	34°11'56.48"S	20°25'35.61"E
WTG 24	34°12'14.92"S	20°25'36.02"E
WC WEF IPP Substation	Latitude	Longitude
Centre Point	34° 8'48.33"S	20°21'10.90"E
Corner 1 of Substation	34° 8'47.98"S	20°21'8.64"E
Corner 2 of Substation	34° 8'46.28"S	20°21'10.61"E
Corner 3 of Substation	34° 8'48.30"S	20°21'13.11"E
Corner 4 of Substation	34° 8'50.00"S	20°21'11.14"E
132kV Overhead Powerline from WEC WEF IPP Substation to Agulhas MTS	Latitude	Longitude
Start Point	34° 8'48.32"S	20°21'12.58"E
Bend Point 1	34° 8'46.47"S	20°21'14.59"E
Bend Point 2	34° 8'43.94"S	20°21'11.41"E
Bend Point 3	34° 8'38.16"S	20°21'10.72"E
Middle Point	34° 8'16.45"S	20°20'44.10"E
Bend Point 4	34° 7'50.52"S	20°20'12.35"E
End Point	34° 7'45.51"S	20°20'18.92"E
Warehouse & Workshop, Control centre and Batching Plant Area	Latitude	Longitude
Centre Point	34° 8'37.68"S	20°21'47.88"E
Corner 1	34° 8'33.69"S	20°21'45.74"E
Corner 2	34° 8'38.40"S	20°21'53.17"E
Corner 3	34° 8'41.56"S	20°21'50.30"E
Corner 4	34° 8'36.85"S	20°21'42.99"E

Visitor's Centre & Offices	Latitude	Longitude
Centre Point	34° 7'10.87"S	20°21'47.91"E
Corner 1	34° 7'9.20"S	20°21'48.81"E
Corner 2	34° 7'9.09"S	20°21'48.82"E
Corner 3	34° 7'12.25"S	20°21'49.03"E
Corner 4	34° 7'12.34"S	20°21'47.06"E
Construction Camp & Laydown Area 1	Latitude	Longitude
Centre Point	34° 7'17.14"S	20°21'46.82"E
Corner 1	34° 7'9.31"S	20°21'43.96"E
Corner 2	34° 7'9.09"S	20°21'48.83"E
Corner 3	34° 7'23.35"S	20°21'49.72"E
Corner 4	34° 7'23.57"S	20°21'44.84"E
Construction Camp & Laydown Area 2	Latitude	Longitude
Centre Point	34° 7'57.93"S	20°21'59.15"E
Corner 1	34° 7'53.86"S	20°21'55.06"E
Corner 2	34° 7'53.32"S	20°21'55.39"E
Corner 3	34° 7'52.26"S	20°21'57.36"E
Corner 4	34° 7'52.07"S	20°22'1.51"E
Corner 5	34° 8'2.70"S	20°22'3.87"E
Corner 6	34° 8'3.13"S	20°21'56.07"E
Construction Camp & Laydown Area 3	Latitude	Longitude
Centre Point	34° 8'27.33"S	20°21'53.11"E
Corner 1	34° 8'20.43"S	20°21'53.22"E
Corner 2	34° 8'22.74"S	20°21'58.83"E
Corner 3	34° 8'33.67"S	20°21'53.62"E
Corner 4	34° 8'31.41"S	20°21'47.82"E
Construction Camp & Laydown Area 4	Latitude	Longitude
Centre Point	34° 8'37.74"S	20°21'48.02"E
Corner 1	34° 8'33.71"S	20°21'45.73"E
Corner 2	34° 8'38.44"S	20°21'53.18"E
Corner 3	34° 8'41.58"S	20°21'50.27"E
Corner 4	34° 8'36.86"S	20°21'42.99"E
Temporary laydown Area 5	Latitude	Longitude
Centre point	34°10'29.22"S	20°22'47.54"E
Corner 1	34°10'26.23"S	20°22'42.05"E
Corner 2	34°10'28.11"S	20°22'53.54"E
Corner 3	34°10'31.93"S	20°22'52.64"E
Corner 4	34°10'30.36"S	20°22'43.07"E
Corner 5	34°10'29.30"S	20°22'42.12"E
Temporary Laydown Area 6	Latitude	Longitude
Centre point	34°10'53.01"S	20°25'44.37"E
Corner 1	34°10'48.36"S	20°25'45.88"E
Corner 2	34°10'50.87"S	20°25'49.44"E
Corner 3	34°10'57.07"S	20°25'43.11"E
Corner 4	34°10'54.54"S	20°25'39.55"E
Batching Plant 1	Latitude	Longitude

Centre Point	34° 8'38.93"S	20°21'49.68"E
Corner 1	34° 8'36.01"S	20°21'49.32"E
Corner 2	34° 8'38.42"S	20°21'53.14"E
Corner 3	34° 8'41.56"S	20°21'50.27"E
Corner 4	34° 8'39.10"S	20°21'46.46"E
Batching Plant 2	Latitude	Longitude
Centre Point	34°10'30.48"S	20°22'55.39"E
Corner 1	34°10'28.14"S	20°22'53.56"E
Corner 2	34°10'28.78"S	20°22'58.30"E
Corner 3	34°10'32.71"S	20°22'57.29"E
Corner 4	34°10'31.94"S	20°22'52.67"E
Batching Plant 3	Latitude	Longitude
Centre Point	34°10'57.35"S	20°25'47.04"E
Corner 1	34°10'54.46"S	20°25'46.90"E
Corner 2	34°10'57.03"S	20°25'50.43"E
Corner 3	34°11'0.08"S	20°25'47.22"E
Corner 4	34°10'57.49"S	20°25'43.72"E

3.1.7 Substantive Amendment 6: Approve the final layout (dated 02 August 2024) in furtherance of Condition 13 of the EA

Description of the amendment: Approval of the final layout in furtherance of Condition 13 of the EA. The layout is being amended to accommodate final design, as determined by the detailed engineering phase and micro-siting of the wind turbine positions. This also incorporates all mitigation measures and input from the Professional Team as per Condition 13 of the EA. This layout (dated 02 August 2024) is presented with this Part 2 Amendment process for approval.

Reason for the Amendment: As per condition 13 of the EA¹⁰ the final layout must be submitted to the Competent Authority for approval prior to construction and a copy of the final site layout map must be made available for comments to registered Interested and Affected Parties. Herewith as presented within the motivation report and Appendix A the final layout (dated 02 August 2024) is submitted for approval.

From:

Condition 13 on Page 11 of the EA:

13. A final layout plan for the 140MW Western Cape Wind Energy Facility, substation and all associated infrastructure, as determined by the detailed engineering phase and micro-siting of the wind turbine positions, and all mitigation measures as dictated by the final site layout plan, must be submitted to the Department for approval prior to construction. A copy of the final site layout must be made available for comments to registered Interested and Affected Parties and the holder of the this Environmental Authorisation must consider such comments. Once amended, the final development layout map must be submitted to the Department for written approval prior to commencement of the activity. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible e.g. roads. The layout map must indicate the following:

- 13.1 The position of the wind turbines and associated infrastructure;*
- 13.2 Internal roads indicating width;*

¹⁰ Environmental Authorisation ("EA") dated 12 December 2021 DFFE Reference 14/12/16/3/3/1/2437

- ~~13.3 Wetlands, drainage lines, rivers, stream and water crossing of roads and cables;~~
~~13.4 All sensitive features e.g Important Bird Areas, Critical Biodiversity Areas, Ecological Support Areas, Heritage sites, wetlands, pans, and drainage channels that will be affected by the facility and associated infrastructure;~~
~~13.5 The BESS substation(s) inverters and/or transformer(s) sites including their entire footprint;~~
~~13.6 Connection routes (including pylon positions) to the distribution/transmission network;~~
~~13.7 All existing infrastructure on the site such as roads;~~
~~13.8 Soil heaps (temporary for topsoil and subsoil and permanently for excess material);~~
~~13.9 Buildings, including accommodation; and~~
~~13.10 All “no-go” and buffer areas.~~

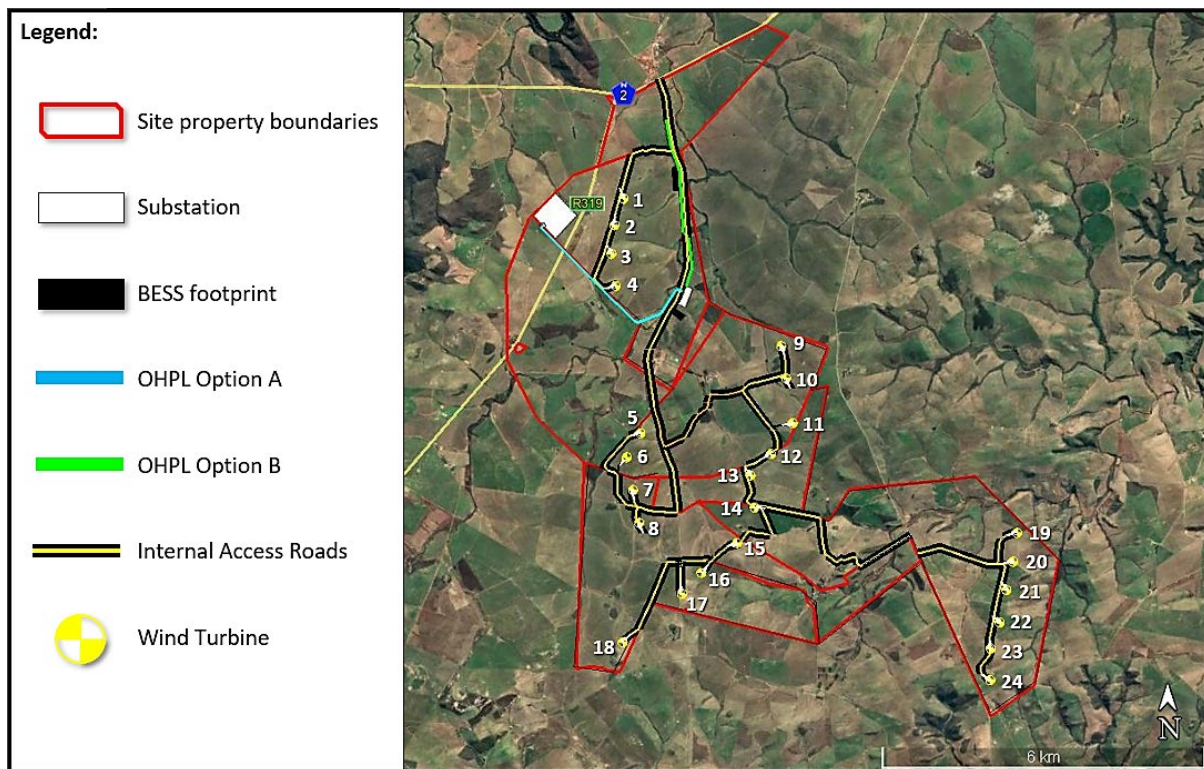


Figure 3.1. Old layout plan for the Western Cape Wind Energy Facility, substation and all associated infrastructure (dated October 2021).

Environmental Authorisation must consider such comments. Once amended, the final EMPr must be submitted to the Department for written approval prior to commencement of the activity."

To:

"14. The Environmental Management Programme (EMPr) for the facility with the final layout (dated 02 August 2024) is approved and must be implemented and adhered to. Any further changes pertaining to the EMPs would need to be updated as per the applicable Regulations at that time."

Condition 15 on page 12 of the EA

From:

"15. The EMPr amendments must include the following:

- 15.1 All recommendations and mitigation measures recorded in the BAR and the specialist reports as included in the BAR dated October 2021.***
- 15.2. The requirements and conditions of this authorisation.***
- 15.3. An effective monitoring system to detect any leakage or spillage of any hazardous substances during their transportation, handling, use and storage. This must include precautionary measures to limit the possibility of oil and other toxic liquids from entering the soil or storm water systems.***
- 15.4. A transportation plan for the transport of turbine components, main assembly cranes and other large equipment.***
- 15.5. An environmental sensitivity map indicating environmentally sensitive areas and features identified during the EIA process.***
- 15.6. Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmentally sensitive areas from construction impacts including the direct or indirect spillage of pollutants"***

To:

"15. Any subsequent EMPr amendment must include the following:

- 15.1 All recommendations and mitigation measures recorded in the BAR and the specialist reports as included in the BAR dated October 2021, and any subsequent amendments.**
- 15.2. The requirements and conditions of this authorisation."**

Condition 16 on page 12 and 13 of the EA

From:

"16. Part C (Site Specific Environmental Attributes) of the generic EMPs (Annexure L and Annexure M) for the Overhead Line and Substation and all associated infrastructure, submitted as part of the BAR dated October 2021, is not approved. Part C must be amended to include measures as dictated by the final site layout map and micro-siting, and the provisions of this Environmental Authorisation. Part C of the generic EMPs must be made available for comments to registered interested parties and the holder of this Environmental Authorisation must consider such comments. Once amended, the generic EMPs must be submitted to the Department for written approval of Part C prior to commencement of the activity. Part C of the generic EMPs must be amended to include the following:

- 16.1 The requirements and conditions of this Environmental Authorisation;***
- 16.2. Measures as dictated by the final site layout map and micro-siting;***
- 16.3 All recommendations and mitigation measures recorded in the BAR and the specialist reports as included in the BAR dated October 2021;***
- 16.4 An effective monitoring system to detect any leakage or spillage of any hazardous substances during their transportation, handling, use or storage. This must include precautionary measures to limit the possibility of oil and other toxic liquids from entering the soil or storm water systems;***

- ~~16.5 A fire management plan to be implemented during the construction and operation of the facility;~~
- ~~16.6 A re-vegetation and habitat rehabilitation plan. The plan must provide for restoration to be undertaken as soon as possible after completion of construction activities, to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats;~~
- ~~16.7 An aquatic Rehabilitation and Monitoring plan, particularly for watercourse features that will be infilled and/ or excavated;~~
- ~~16.8 A stormwater management plan; and~~
- ~~16.9 The final site layout map.”~~

To:

“16. The generic Substation and Overhead Powerline EMPs dated August 2024 with the final layout and associated management plans, comply with the conditions (16.1 – 16.9) outlined in the EA (DFFE Ref: 14/12/16/3/3/1/2437, dated 12 December 2021), are approved and must be implemented and adhered to. Any further changes pertaining to these EMPs would need to be updated as per the applicable Regulations at that time.”

3.2 ADVANTAGES AND DISADVANTAGES ASSOCIATED WITH THE PROPOSED AMENDMENTS

The table below provides the advantages and the disadvantages of the proposed amendments as per (1)(a)(ii) of Section 32 of GNR 982 (as amended).

Table 3.1. Advantages and Disadvantages of the proposed Amendments.

Amendment	Advantages of granting	Disadvantages of refusing
Administrative Amendment 1: Change the EA holder and update the contact details of the Holder of the EA	The EA will reference the correct contact details of the Holder of the EA.	If this Amendment is refused, the roles and obligations of the EA will not be ceded to the contracted entity and the EA will reference the incorrect contact details of the EA Holder
Substantive Amendment 1: Upgrade the technical specifications of the WTG to	The approval of this amendment will ensure the technical specifications of the WTGs that need to be upgraded due to a contractual agreement with Eskom, and the requirements to enhance the facility's capacity.	If the Amendment is refused, the EA will reference the incorrect technical specifications and further, impinge on commercial and contractual obligations for the WEF
Substantive Amendment 2: Removal of any and all references to the Battery Energy Storage System (BESS) in the EA	Management actions outlined in the EA will only be applicable to infrastructure included in the Final Layout (dated 02 August 2024).	If this Amendment is refused, the EA will reference infrastructure not included in the in the Final Layout (dated 02 August 2024).
Substantive Amendment 3: Finalise the description of the main components details described on page 8 of the EA to reflect the final layout design	This is a statutory requirement of the EA and needs to be fulfilled.	If this amendment is refused, the statutory requirement of the EA will not be fulfilled in addition to the commercial and contractual obligations of the Wind Farm being adversely impacted.
Substantive Amendment 4: Update the technical details table of the WEF and associated infrastructure	This is a statutory requirement of the EA and needs to be fulfilled. The EA will then refer to the correct technical details for the final layout dated (02 August 2024).	If this amendment is refused, the statutory requirement of the EA will not be fulfilled in addition to the commercial and contractual obligations of the Wind Farm being adversely impacted.
Substantive Amendment 5: Update the coordinates of the WEF	This is a statutory requirement of the EA and needs to be fulfilled. The coordinates in the EA must be updated to reflect the final technical design.	If this amendment is refused, the statutory requirement of the EA will not be fulfilled, furthermore to the commercial and contractual obligations of the Wind Farm being adversely impacted, in addition to

		inaccurate geographical referencing for the final technical design being included in the EA, which is not logical.
Substantive Amendment 6: Approve the final layout (dated 02 August 2024) in furtherance of Condition 13 of the EA	This is a statutory requirement of the EA and needs to be fulfilled.	Should the amendment not be granted the final layout will not be submitted as per Condition 13 of the EA, therefore, The Project will not be compliant with a Condition of Authorisation.
Substantive Amendment 7: Approve the WEF EMPr and Generic EMPrs (OHPL & Substation) in order to fulfil the requirements of Conditions 14, 15 and 16 of the EA	This is a statutory requirement of the EA and needs to be fulfilled. The updated mitigation measures will allow for better management of impacts on site during construction, operation and decommissioning. The approval of the EMPrs includes the addition of information such as the final site layout and management plans.	Should the amendment not be granted, the EMPr and Generic Substation & OHPL EMPr will not be submitted as per Conditions 14, 15 and 16 of the EA. Therefore, The Project will not be compliant with the Conditions of Authorisation.

3.3 LISTED ACTIVITIES TRIGGERED

There are **no new activities triggered with this application and the proposed amendments.**

Please refer to Appendix B for a copy of the Environmental Authorisation that summarises all approved listed activities.

4 LEGISLATIVE CONTEXT

The different sets of legislative requirements are housed under the National Environmental Management Act (Act No. 107 of 1998) as amended. The proposed amendments to the Environmental Authorisation will trigger the National Environmental Management Act (Act No. 107 of 1998) (as amended) and the NEMA EIA Regulations (2014, as amended), resulting in an Amendment Process to be undertaken.

The Amendment applied for triggers the following National Statutes:

- National Environmental Management Act (Act No. 107 of 1998) and the NEMA EIA Regulations (2014, as amended)
- The NEMA EIA Regulations (2014) were published on 08 December 2014, amended on 07 April 2017 and again on 13 July 2018, and deal with activities that may have an impact on the environment.

Section 24C(2)(a) of NEMA stipulates that the Minister of Forestry, Fisheries and the Environment (“the Minister”) must be identified as the Competent Authority (“CA”) if the activity has implications for international environmental commitments or relations. GN 779 of 01 July 2016 identifies the Minister as the CA for the consideration and processing of environmental authorisations and amendments thereto for activities related to the Integrated Resource Plan (IRP) 2010 – 2030. As this project relates to the amendment of the Overberg Wind Energy it is related to the IRP, the National Department of Forestry, Fisheries and the Environment (“DFFE”) is the CA for the proposed project.

Description of a Part 2 Substantive Amendment Process

Regulation 31 of the NEMA EIA Regulations (2014, as amended) states that:

“An environmental authorisation may be amended by following the process prescribed in this Part if the amendment will result in a change to the scope of a valid environmental authorisation where such change will result in an increased level or nature of impact where such level or nature of impact was not –

(a) assessed and included in the initial application for environmental authorisation; or

(b) taken into consideration in the initial environmental authorisation;

and the change does not, on its own, constitute a listed or specified activity.”

With this Amendment process, the Applicant wishes to undertake various amendments that are administrative and/or substantive of nature (as described in detail within section 3.1 of this motivation report). The information provided within the amendments were either not included with the initial application for environmental authorisation (the technical details and positioning of all components of the WEF) or taken into consideration in the initial application (change in contact details of the EA holder and the slight increase in the size of the substation). A combined Amendment Process is followed (for this process) for the required Part 1¹² (Administrative) and Part 2 (Substantive) amendments to the EA issued, in terms of Regulation 31 and 32 of the NEMA EIA Regulations (2014, as amended).

¹² An environmental authorisation may be amended by following the process prescribed in a Part 1 if the amendment—

(a) will not change the scope of a valid environmental authorisation, nor increase the level or nature of the impact, which impact was initially assessed and considered when application was made for an environmental authorisation; or

(b) relates to the change of ownership or transfer of rights and obligations.

As per sub-regulation 31(a) the proposed application for the amendments, as listed in section 3.1, were not considered as part of the initial BAR process undertaken, therefore these (potential) impacts need to be assessed according to the change in level or nature of impact. Therefore, the Part 2 Amendment process is followed.

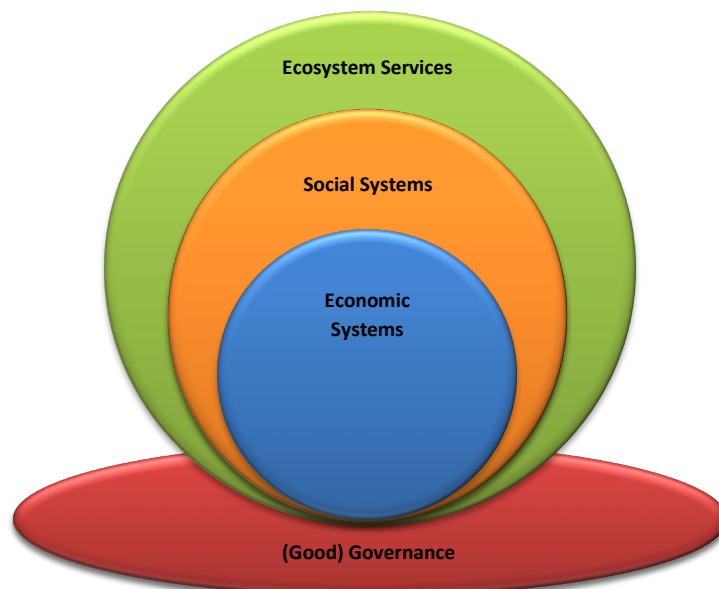
5 MOTIVATION FOR NEED AND DESIRABILITY FOR THE ACTIVITY

The need and desirability of The Project **has already been thoroughly assessed** in terms of NEMA Principles **and approved by the Competent Authority**. The nature and scope of this amendment application does not warrant a comprehensive reassessment of need and desirability, only to reference the amendments applied for.

The National Environmental Management Principles specifically *inter alia* require the following:

- *“Environmental Management must place people and their needs at the forefront of its concern” and equitably serve their interests;*
- *“Environmental Management must be integrated, acknowledging that all elements of the environment are linked and interrelated, and it must take into account the effects of decisions on all aspects of the environment and all people in the environment by pursuing the selection of the best practicable environmental option;*
- *“Environmental justice must be pursued so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person”; and*
- *“Decisions must take into account the interests, needs and values of all interested and affected parties”;*
- *“The Environment is held in public trust for the people, the beneficial use of environmental resources must serve the public interest and the environment must be protected as the people’s common heritage”.*

Sustainable development is best summarised by an extract from the United Nations World Commission on Environment and Development and reads as follows:



"Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs... As such it requires the promotion of values that encourage consumption standards that are within the bounds of the ecologically possible and to which all could reasonably aspire."

(Our Common Future, WCED, 1987)¹³.

¹³United Nations. 1987. *"Report of the World Commission on Environment and Development."* General Assembly Resolution 42/187, 11 December 1987

Motivation for the proposed amendment

The amendments presented in this Motivation Report align with the principles above for several reasons. Firstly, detailed design of the final layout for the facility to align with the requirements of the EA and updated specialists' assessments represent the best practicable environmental option and final, buildable engineered design. Approval of the Environmental Management Programmes (EMPrs), which include reference to updated information above, is required to ensure that robust environmental construction management practices are in place. The administrative amendments proposed are essential to ensure that contractual and commercial terms are met in order to allow The Project to be built and operate as intended.

The original discussion on the need and desirability of The Project is extracted from the previous assessment for ease of reference:

- *The Project promotes the development of additional energy facilities to ensure that sufficient electricity is supplied to the national grid to meet the country's demand*
- *Indicates suitability and high wind energy potential of the area*
- *Exigency to rely on cleaner energy resources*
- *Reduces the negative economic, social and environmental impacts of energy production and consumption*
- *Essential to improving the country's electricity supply*
- *Contributes to South Africa's overarching goal of sustainable development through promoting a greener economy, improving access to critical resources and developing a greater network of essential infrastructure in places where it is most needed*
- *Being located within a Renewable Energy Development Zone (Zone 1 – Overberg), an identified area of strategic importance for large scale wind farm development in support of the South African economy*
- *Promotes economic growth in the Western Cape*
- *Assists in meeting national commitments to carbon emission targets in line with global climate change commitments*
- *Promotes the development and construction of more wind energy facilities in the region*
- *The Project has specifically been selected to maximise socio-economic potential in the region in the form of job creation and energy supply*

Western Cape Wind Farm (Pty) Ltd has been selected as the **Preferred Bidder** in a tender submitted for a large industrial private off-taker. Thus, The Project forms part of a private procurement programme in the commercial and industrial (C&I) sector. The Project, under a private Power Purchase Agreement (PPA) will contribute electricity, which is intended to be 'wheeled' via the National Eskom Grid.

The WCWEF has been authorised by the DFFE and the need and desirability of the activity have been assessed and approved as per the EA (DFFE Ref: 14/12/16/3/3/1/2437 dated 12 December 2021).

The proposed amendments do **not change the context** of the original approved motivation above and do not warrant any comprehensive considerations of the Project in terms of need and desirability but only of the proposed amendments, and which based on the available information, are **deemed acceptable and implementable by the professional team of independent specialists**.

6 SITE SENSITIVITY VERIFICATION

To guide the level of assessment and reporting when applying for Environmental Authorisation (EA) or an amendment thereof, the protocols for the assessment and minimum criteria for reporting on identified environmental themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, were promulgated. These procedures are based on the outputs of the Departments web-based Screening Tool Report (STR) and are **obligatory to produce and present in all Environmental Impact Assessment (EIA) processes as of 04 October 2019**.

The DFFE STR is an output of the Department's web-based Screening Tool and identifies the key environmental sensitivities of the site, deemed important by the DFFE, to consider as part of the application process. It is required to confirm or dispute the web-based findings presented by utilising accurate site information and expert assessments from the Professional Team stipulated within a Site Sensitivity Verification Report (SSVR). The manner of these motivations is guided by the regulations above and the protocols and assessment criteria which were published on 20 March 2020¹⁴. Protocols to be followed are specified for each Environmental Theme and are aimed at confirming or disputing the current use of the land and the environmental sensitivity using but not limited to motivating evidence such as: photographs, satellite imagery, site investigation etc.

6.1 IDENTIFIED THEME SENSITIVITIES FOR THE SITE/ACTIVITY

To ensure this section aligns with the requirements of the SSVR, data and information was gathered and reviewed by the EAP from various sources. These sources included:

1. The STR for the proposed activity which revealed the associated environmental themes
2. Specialist inputs and studies required for the current amendment application process
3. A desktop analysis, using satellite imagery
4. A preliminary on-site inspection
5. Any other available and relevant information

The following sensitivities have been identified by the Screening Tool:

Theme	Sensitivity			
	Very High	High	Medium	Low
Agriculture Theme		X		
Animal Species Theme		X		
Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme		X		
Avian (Wind) Theme	X			
Bats (Wind) Theme		X		
Civil Aviation (Wind) Theme			X	
Defence (Wind) Theme		X		
Flicker Theme	X			
Landscape (Wind) Theme	X			
Palaeontology Theme	X			
Noise Theme	X			
Plant Species Theme			X	
RFI (Wind) Theme		X		
Terrestrial Biodiversity Theme	X			
Vulture Species Theme		X		

¹⁴ Procedures for the Assessment and minimum criteria for the reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the NEMA Act 1998 when applying for Environmental authorisation (2020)

6.1.1 Agricultural Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “high sensitivity”.

How the project site relates to identified theme

The proposed amendments will be undertaken on farmland where active farming activities are taking place. The proposed amendments take into consideration the active farming activities on site.

EAP Recommendation

An agricultural specialist has been appointed to assess the agricultural sensitivity of the site, based on the proposed amendments to an already authorised facility. The specialist findings can be reviewed under section 7 below and under Appendix E of this Motivation Report.

Appointed Specialist(s):

Agri Informatics (C/O Francois Knight)

Email: francois@agriinformatics.co.za

6.1.2 Animal Species Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “high sensitivity”.

How the project site relates to identified theme

The Project is located in close proximity to nature reserves. Faunal species, avifauna and bats are likely to be the most affected by the Project.

EAP Recommendation

Specialists has been appointed to assess the animal species sensitivity of the site, based on the proposed amendments to an already authorised facility. The specialist findings can be reviewed under section 7 below and under Appendix E of this Motivation Report.

Appointed Specialist(s):

Avifaunal (bird) Specialist

Enviro-Insight CC (C/O Luke Verburgt)

Email: luke@enviro-insight.co.za

Bat Specialist

Enviro-Insight CC (C/O Luke Verburgt)

Email: luke@enviro-sight.co.za

Ecological Specialist

Nick Helme Botanical Surveys (C/O Nick Helme)

Email: botaneek@iafrica.com

6.1.3 Aquatic Biodiversity Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “very high sensitivity”.

How the project site relates to identified theme

The proposed amendments will be potentially located in close proximity to aquatic systems such as wetlands, rivers and Critical Biodiversity Areas (CBA), on site. The proposed amendments take this theme into consideration.

EAP Recommendation

An aquatic specialist has been appointed to assess the aquatic biodiversity sensitivity of the site, based on the proposed amendments to an already authorised facility. The specialist findings can be reviewed under section 7 below and under Appendix E of this Motivation Report.

Appointed Specialist(s):

SAS Environmental (C/O Stephen van Staden)

Email: stephen@sasenvgroup.co.za

6.1.4 Archaeological and Cultural Heritage Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “high sensitivity”.

How the project site relates to identified theme

The proposed amendments will potentially be located in close proximity to heritage sites. The proposed amendments take potential heritage sites into consideration.

EAP Recommendations

A heritage specialist has been appointed to assess the area for Heritage sites. The specialist findings can be reviewed under section 7 below and under Appendix E of this Motivation Report.

Appointed Specialist(s):

PGS Heritage (C/O Wouter Fourie)

Email: wouter@pgsheritage.com

6.1.5 Avian (Wind) Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “very high sensitivity”.

How the project site relates to identified theme

The proposed amendments will be undertaken in areas close to potential bird and bat colonies as noted by the STR. Avifauna and bats are likely to be the most affected faunal species relating to The Project, being sensitive to collisions with turbines. The proposed amendments take the sensitive areas for Bird's and Bat's into consideration.

EAP Recommendation

An Avifaunal and bat specialist has been appointed to assess the avian sensitivity of the site, based on the proposed amendments to an already authorised facility. The specialist findings can be reviewed under section 7 below and under Appendix E of this Motivation Report.

Appointed Specialist(s):

Avifaunal (bird) Specialist

Enviro-Insight CC (C/O Luke Verburgt)

Email: luke@enviro-insight.co.za

Bat Specialist

Enviro-Insight CC (C/O Luke Verburgt)

Email: luke@enviro-sight.co.za

6.1.6 Bat (Wind) Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “high sensitivity”.

How the project site relates to identified theme

The proposed amendments will be undertaken in areas close to potential bird and bat colonies as noted by the STR. Avifauna and bats are likely to be the most affected faunal species relating to The Project, being sensitive to collisions with turbines. The proposed amendments take the sensitive areas for Bird’s and Bat’s into consideration.

EAP Recommendation

An avifaunal and bat specialist has been appointed to assess the avian sensitivity of the site, based on the proposed amendments to an already authorised facility. The specialist findings can be reviewed under section 7 below and under Appendix E of this Motivation Report.

Appointed Specialist(s):

Bat Specialist

Enviro-Insight CC (C/O Luke Verburgt)

Email: luke@enviro-sight.co.za

6.1.7 Civil Aviation Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “medium sensitivity”.

How the project site relates to identified theme

Due to the height of the proposed turbines civil aviation may be impacted. The majority of the site is indicated as having “medium sensitivity”.

EAP Recommendation

The Civil Aviation Authority will be notified of the proposed amendments and will be afforded the opportunity to comment on the proposed WEF during the Public Participation Process.

6.1.8 Defence Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “high sensitivity”.

How the project site relates to identified theme

Due to the nature of the activity, and the presence of possible surrounding wind energy facilities, it is unlikely that any impact on defence will take place. The site is within a REDz and the WEF has already received authorisation.

EAP Recommendation

No further action is required with regards to appointing specialists.

6.1.9 Flicker Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “very high sensitivity”. This is due to the Screening Tool indicating the presence of a number of “Potential temporarily or permanently inhabited residence”.

How the project site relates to identified theme

The proposed amendments will potentially be located in close proximity to a number of farmhouses and potential residences on the site and surrounding properties. The proposed amendments take this theme into consideration.

EAP Recommendation

A visual specialist was appointed to assess the sensitivity of the site, based on the proposed amendments to an already authorised facility. The specialist findings can be reviewed under section 7 below and under Appendix E of this Motivation Report.

Appointed Specialist(s):

Environmental Planning and Design (C/O Jon Marshall)

Email: jon@enviroconsult.co.za

6.1.10 Landscape (Wind) Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “very high sensitivity”.

How the project site relates to identified theme

The nature of Wind turbines makes them visible from a great distance. The proposed amendments will potentially be visible from the surrounding areas. The proposed amendments take this theme into consideration.

EAP Recommendation

A visual specialist was appointed to assess the sensitivity of the site, based on the proposed amendments to an already authorised facility. The specialist findings can be reviewed under section 7 below and under Appendix E of this Motivation Report.

Appointed Specialist(s):

Environmental Planning and Design (C/O Jon Marshall)

Email: jon@enviroconsult.co.za

6.1.11 Palaeontology Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “very high sensitivity”.

How the project site relates to identified theme

The proposed amendments will potentially be located on sensitive Palaeontology sites. The proposed amendments take potential sensitive areas into consideration.

EAP Recommendation

A heritage and Palaeontology specialist has been appointed to assess the area for Heritage sites. The specialist findings can be reviewed under section 7 below and under Appendix E of this Motivation Report.

Appointed Specialist(s):

PGS Heritage (C/O Wouter Fourie)

Email: wouter@pgsheritage.com

6.1.12 Noise Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “very high sensitivity”. This is due to the Screening Tool indicating the presence of a number of “Potential temporarily or permanently inhabited residence”.

How the project site relates to identified theme

The proposed amendments will potentially be located in close proximity to a number of farmhouses and potential residences on the site and surrounding properties. The proposed amendments take this theme into consideration.

EAP Recommendation

A noise specialist has been appointed to assess the sensitivity of the site, based on the proposed amendments to an already authorised facility. The specialist findings can be reviewed under section 7 below and under Appendix E of this Motivation Report.

Appointed Specialists:

dBAcoustics (C/O Barend van den Merwe)

Email: barendv@xsinet.co.za

6.1.13 Plant Species Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “high sensitivity”.

How the project site relates to identified theme

The proposed amendments will potentially be undertaken CBA areas and remnant vegetation. The proposed amendments take this theme into consideration.

EAP Recommendation

An Ecological specialist has been appointed to assess the plant species sensitivity of the site, based on the proposed amendments to an already authorised facility. The specialist findings can be reviewed under section 7 below and under Appendix E of this Motivation Report.

Appointed Specialists:

Nick Helme Botanical Surveys (C/O Nick Helme)

Email: botaneek@iafrica.com

6.1.14 RFI (Wind) Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “high sensitivity”. The site is located more than 60km from a Weather Radar installation and within 1km of a telecommunication facility.

How the project site relates to identified theme

It is the EAPs understanding that the Applicant has consulted with all relevant bodies during Project planning.

EAP Recommendation

The “high sensitivity” rating does not warrant any additional studies.

6.1.15 Terrestrial Biodiversity Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “very high sensitivity”.

How the project site relates to identified theme

The proposed amendments will potentially be undertaken on CBA ecosystems. The proposed amendments take this theme into consideration.

EAP Recommendation

An Ecological specialist has been appointed to assess the plant species sensitivity of the site, based on the proposed amendments to an already authorised facility. The specialist findings can be reviewed under section 7 below and under Appendix E of this Motivation Report.

Appointed Specialists:

Nick Helme Botanical Surveys (C/O Nick Helme)

Email: botaneek@iafrica.com

6.1.16 Vulture Species Theme

Screening Tool categorisation

According to the Screening Tool Report this theme is rated as having a “high sensitivity”.

How the project site relates to identified theme

The proposed amendments will be undertaken in areas close to potential bird and bat colonies as noted by the STR. Avifauna and bats are likely to be the most affected faunal species relating to The Project, being sensitive to collisions with turbines. The proposed amendments take the sensitive areas for Bird’s and Bat’s into consideration.

EAP Recommendation

An Avifaunal and bat specialist has been appointed to assess the avian sensitivity of the site, based on the proposed amendments to an already authorised facility. The specialist findings can be reviewed under section 7 below and under Appendix E of this Motivation Report.

Appointed Specialist(s):

Bat Specialist

Enviro-Insight CC (C/O Luke Verburgt)

Email: luke@enviro-sight.co.za

6.1.17 Conclusion and Way Forward

This Motivation Report **ensured that all previously assessed themes have been verified by the respective specialists and all themes were further investigated and assessed in detail by the Professional Team and illustrated in Section 7 of this Report.** This process is in keeping with the statutory requirements.

7 IMPACT ASSESSMENT OF THE PROPOSED AMENDMENTS

7.1 SUMMARY OF SPECIALIST STUDY FINDINGS FOR THE PROPOSED SUBSTANTIVE AMENDMENTS

TMG appointed an independent Professional Team of experts to review the original specialist assessment reports that accompanied the Basic Assessment Report (BAR) submitted in October 2021, the recent (dated November 2023) specialists assessments for the withdrawn amendment application and then this Final layout design (dated 02 August 2024) and the associated technical specification upgrades to inform the suitability of the proposed amendments, the compilation of the Motivation Report and the Environmental Management Programmes (EMPrs) for approval. Specialist assessments needed to identify and evaluate potential impacts within their respective areas of expertise associated with the proposed amendments and provide guidance to the final design and any additional mitigation measures.

The following specialist assessments were conducted:

- *Agricultural Impact – Agri Informatics Development Trust (C/O Francois Knight, August 2024)*
- *Avifaunal Impact – Enviro-Insight CC (C/O Luke Verburgt, August 2024)*
- *Bat Impact – Enviro-Insight (C/O Luke Verburgt, August 2024)*
- *Ecological and Botanical Impact – Nick Helme Botanical Surveys (C/O Nick Helme, August 2024)*
- *Freshwater – SAS Environmental (C/O Stephen van Staden, August 2024)*
- *Heritage Impact– PGS Heritage (C/O Wouter Fourie, August 2024)*
- *Social Impact – Tony Barbour Environmental Consulting (C/O Tony Barbour, August 2024)*
- *Visual Impact – Environmental planning and Design (C/O Jon Marshall, August 2024)*
- *Traffic Impact – Innovative Transport Solutions (C/O Pieter Arangie, August 2024)*
- *Noise Impact – dBAcoustic – (C/O Barend vd Merwe, August 2024)*

The sections to follow summarise specialists' assessments (attached to this Motivation Report as Appendix E).

7.1.1 Agricultural Impact Findings (Updated Specialist Report 2024)

7.1.1.1 The Agricultural Specialist findings for the proposed amendments to the WEF is as follows:

“The specialist conducted a detailed Agro-Ecosystem Assessment for the Western Cape Wind Energy Facility in July 2021. The aim of this assessment was to assess the impact of the final layout of the turbines and appurtenant structures on the agro-ecosystem of the farms of the study area, relative to the probable impacts already accounted for in the earlier agro-ecosystem specialist assessment and as approved in the Environmental Authorisation.

The main impact of wind energy facilities on agricultural resources and farming activities is related to the total footprint of the turbine foundation, the hard standing areas, the access roads and the other appurtenant structures that are within cultivated fields, as it reduces the area available for crop production. Due to the strategic importance of the development of renewal energy (“RE”) generation capacity in South Africa, guidelines were introduced by the Department of Forestry, Fisheries and the Environment (“DFFE”) to accommodate and regulate the trade-off between agricultural production and RE generation.

*Turbines 1 to 4 are now positioned deeper into cultivated fields, compared to the earlier layout and will thus have larger footprints in the cultivated area. Turbine 17 is again, as per the earlier layout, positioned at the edge of a field and will have a comparable footprint within the cultivated area. The Land Capability class of the cultivated fields are **Low-Moderate**, for which a maximum footprint of 0.25ha per MW generation capacity is allowed.*

*The new turbine positions also necessitate changes in road designs without introducing any significant change in impact. However, in a few cases the new optimised road design has **reduced the total road footprint required** to access the turbines, and also **better avoided** cultivated fields by placing the road alignments along existing farm roads. The net result of the new road design is a **small, but significant reduction in the combined road footprint area**, compared to the authorised layout.*

*The design and footprint of all hard standing areas are the same as per the authorised layout, except for shifts required by the shift in turbine positions. In some cases, the alignment of the hard standing area was adjusted to allow for more optimal road access. **No additional impacts** or an **increase** in the footprint of the WEF is introduced by the new hard standing area layout.*

*All overhead and/or underground collector cables will follow the access roads to the various turbines and **will not introduce** any additional impact on cultivation activities.*

*The nominal generation capacity of the Western Cape WEF is 149.9 MW. The guideline above allows for a footprint of 0.25 ha per MW generation capacity within cultivated fields. This implies that the total footprint of the WEF should not exceed 37.5 ha. The earlier assessment found that the combined footprint of the Western Cape WEF within cultivated fields, amounted to 27.75 ha, **well below the allowable limit**, as suggested by DFFE.*

*The Final layout, dated 02 August 2024, does not introduce any increased or new impacts compared to the authorised layout. The footprint to generation capacity ratio, remains **well below the allowable limit of 37.5 ha**, as suggested by DFFE. The proposed amendment to the wind farm layout is **therefore supported.**”*

7.1.1.2 Conclusions

In conclusion, the specialist's assessment of the agricultural sensitivity of the area where the WEF is located, reaffirms that The Project continues to have a **low-moderate** and acceptable impact on agriculture. The proposed amendments and final layout (dated 02 August 2024) neither enhance nor diminish The Project's agricultural impact. As a result, no additional mitigation measures are deemed necessary to be implemented other than the already provided measures indicated within the 2021 study that has been included within the EMPr.

Based on the available information, the proposed amendments are considered acceptable and implementable provided the updated specialist recommendations and mitigation measures detailed in this Report and the EMPrs (Appendix D) are implemented.

The Amendments are supported in terms of Agricultural impacts.

7.1.2 Avifaunal & Bat Impact Findings (Updated Specialist Report 2024)

7.1.2.1 The Avifaunal and Bat Specialist findings for the proposed amendments to the WEF is as follows:

“Energy Generation Capacity

There are no anticipated direct impacts to bats and avifauna purely from an increase in the energy generation capacity from each turbine. However, increased energy generation capacity results, at least partially, from some of the technical specification changes discussed below and direct impacts from these changes are therefore not discussed here.

Increased Rotor Diameter & Positional Changes - Avifauna:

None of the No-Go areas delineated for avifauna will be affected by the proposed maximum increase in blade length and turbine positional changes and therefore, **no additional impact to sensitive avifauna is expected.**

Increased Rotor Diameter & Positional Changes - Bats:

The turbine blade length increases to 100m (maximum proposed) and the positional changes of WTG 01, 03, 10, 11, 12, 15, 18, 21, 22 and 24 do not infringe on the No-Go areas delineated for bats.

Table 7.1. Intersection summary per turbine for Bat sensitivity features (extracted from Specialist Report).

Turbine	Overlap with Bat No-Go buffer	Degree of Overlap	Mitigation Required
WTG 1	X	Moderate (~35 m)	Micro-site outside of buffer
WTG 2			
WTG 3	X	Moderate (~40 m)	Micro-site outside of buffer
WTG 4	X	Extensive (~80 m + ~67 m)	See WTG 4 discussion below
WTG 5			
WTG 6			
WTG 7	X	Minimal (~2 m)	None
WTG 8			
WTG 9			
WTG 10	X	Moderate (~11 m)	Micro-site outside of buffer
WTG 11	X	Moderate (~17 m)	Micro-site outside of buffer
WTG 12	X	Moderate (~10 m)	Micro-site outside of buffer
WTG 13	X	Minimal (~3 m)	None
WTG 14			
WTG 15	X	Moderate (~27 m + ~7 m)	Micro-site outside of buffer
WTG 16	X	Moderate (~15 m + ~10 m)	Unable to micro-site see discussion below
WTG 17	X	Extensive (~70 m)	See WTG17 discussion below

WTG 18	X	Moderate (~12 m)	Micro-site outside of buffer
WTG 19	X	Minimal (~8 m)	None
WTG 20	X	Minimal (~5 m)	None
WTG 21	X	Moderate (~16 m + ~5 m)	Micro-site outside of buffer
WTG 22	X	Moderate (~24 m)	Micro-site outside of buffer
WTG 23			
WTG 24	X	Moderate (~20 m + ~5 m + ~5 m)	Micro-site outside of buffer

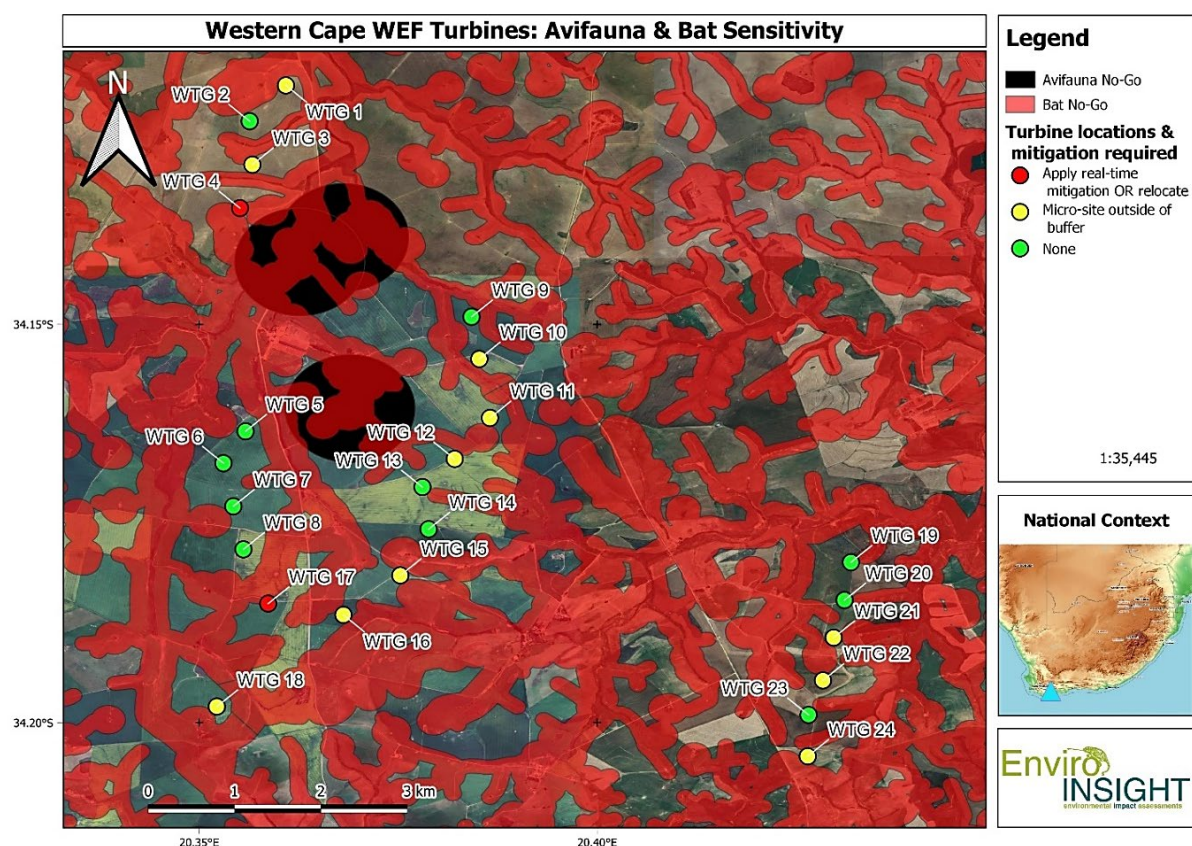


Figure 7.1. Interaction between the turbine blade reach areas and the Avifauna & Bat No-Go buffers. Proposed mitigation per turbine is indicated (Extracted from the Specialist Report).

WTG 4, WTG16 & WTG 17

From Table 7.1 it is clear that the proposed placement of turbines WTG4 & WTG17 will result in significant overlap of their turbine blade reach areas with the originally defined bat No-Go delineation. The developer has indicated that they are unable to relocate WTG4, WTG16 & WTG17 so that their blade reach areas are outside of the originally defined bat No-Go delineation and therefore, each of these turbines are inspected spatially and discussed separately below to assess the potential impacts to bats.

The positional change to these turbines was made by the developer after the specialist had visited the site and therefore, historical imagery (courtesy of Google Earth) and the original drainage delineations used for the EIA were utilised to assess some of the drainage features.

WTG 4

Spatial inspection of the blade reach area of WTG 4 in relation to the originally defined bat No-Go delineation shows that the intersection is due to two unvegetated cropland drainages that have been buffered (Figure 7.2). Historical imagery shows that these drainages remain unvegetated indefinitely while other more natural drainage areas in close proximity are clearly vegetated throughout this period. This indicates that the upper reaches of these unvegetated drainages are being maintained as such on order to facilitate drainage for the cropland and that they are not natural. Consequently, they are not expected to attract bats in the same manner as naturally vegetated drainages and are not likely to have any meaningful surface water other than for a very short period immediately after heavy rainfall. These drainages can therefore be excluded from the bat No-Go buffer which will result in the turbine blade reach area of WTG 4 falling outside of the bat No-Go buffer since the nearest justifiable feature to be buffered is the open water dam situated just south of WTG 4 and which is further than 200 m away from the turbine blade reach areas of WTG 4. The specialist therefore does not consider this buffer infringement to be meaningful and no relocation or micro-siting is recommended for this turbine as avoidance mitigation has been applied appropriately.

WTG16

Spatial inspection of the blade reach area of WTG 16 in relation to the originally defined bat No-Go delineation shows that the intersection is mainly due to two dams that must be buffered by 200m (Figure 7 3). These infringements are relatively minor but nevertheless require additional mitigation to ensure that any potential impacts to bats from this positional change are minimised. It is therefore recommended that an automated real-time bat monitoring “smart system” should be deployed on this turbine.

WTG 17

Spatial inspection of the blade reach area of WTG 17 in relation to the originally defined bat No-Go delineation shows that the intersection is due to an unvegetated cropland drainage more than 200 m to the north of WTG 17 that has been buffered by 200 m as required for wetlands (Figure 7.4). This is an error as historical imagery shows that this drainage remained unvegetated for a long period until recently when it was completely planted over with wheat. Furthermore, the updated spatial delineation of wetlands performed by Van Staden (2024) confirms that this is not a wetland and therefore does not require a 200 m buffer for bats. The turbine blade reach area of WTG 17 therefore falls outside of the bat No-Go buffer since the nearest justifiable feature to be buffered is the open water dam situated just north of WTG 17 and which is further than 200 m away from the turbine blade reach areas of WTG 17. The specialist therefore does not consider this buffer infringement to be meaningful and no relocation or micro-siting is recommended for this turbine as avoidance mitigation has been applied appropriately.

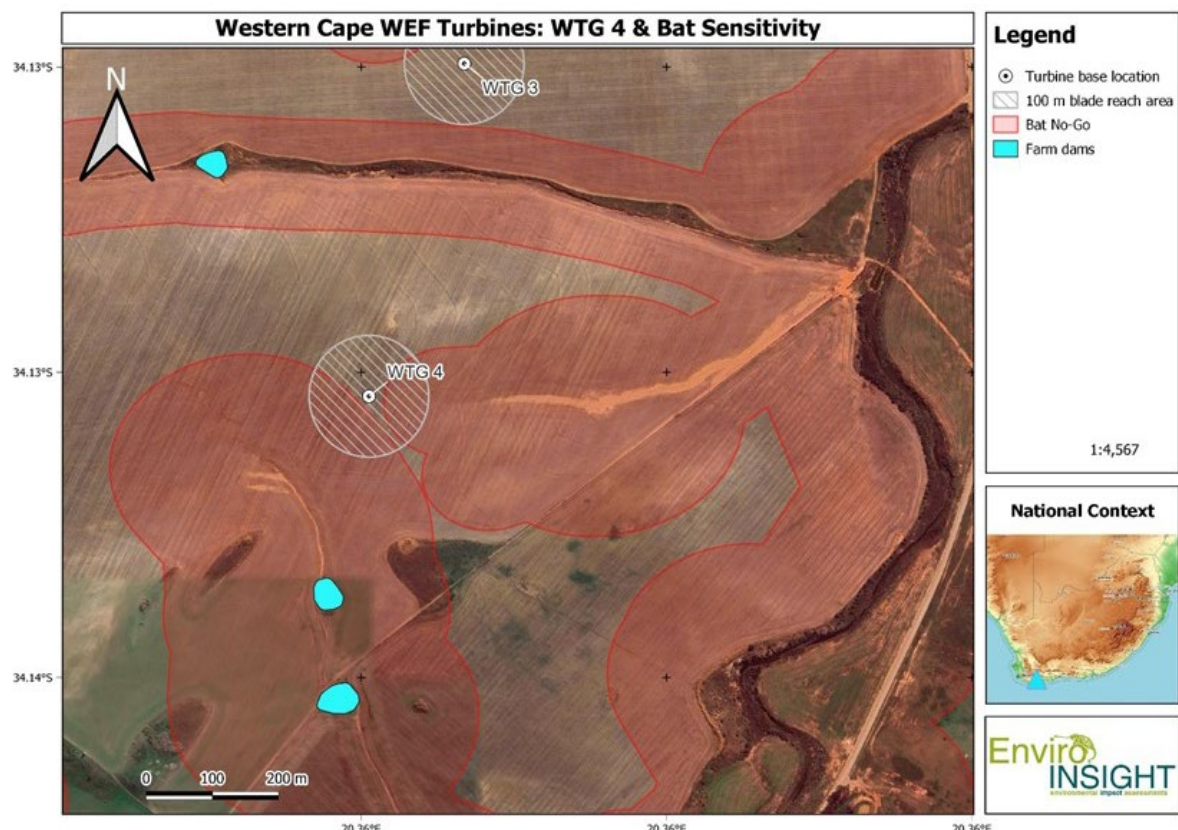


Figure 7.2. Interaction between the turbine blade reach areas and the original Bat No-Go buffers for WTG 4

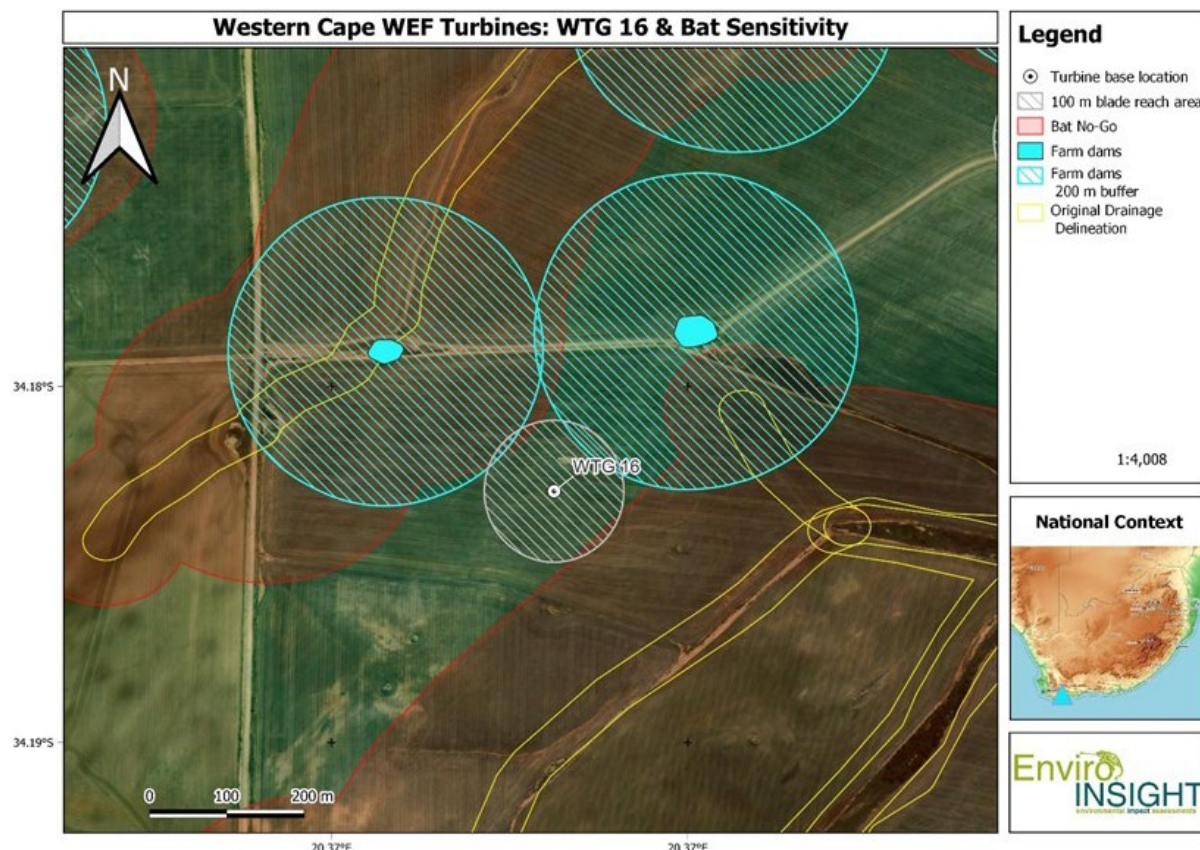


Figure 7.3. Interaction between the turbine blade reach areas and the original Bat No-Go buffers for WTG 16

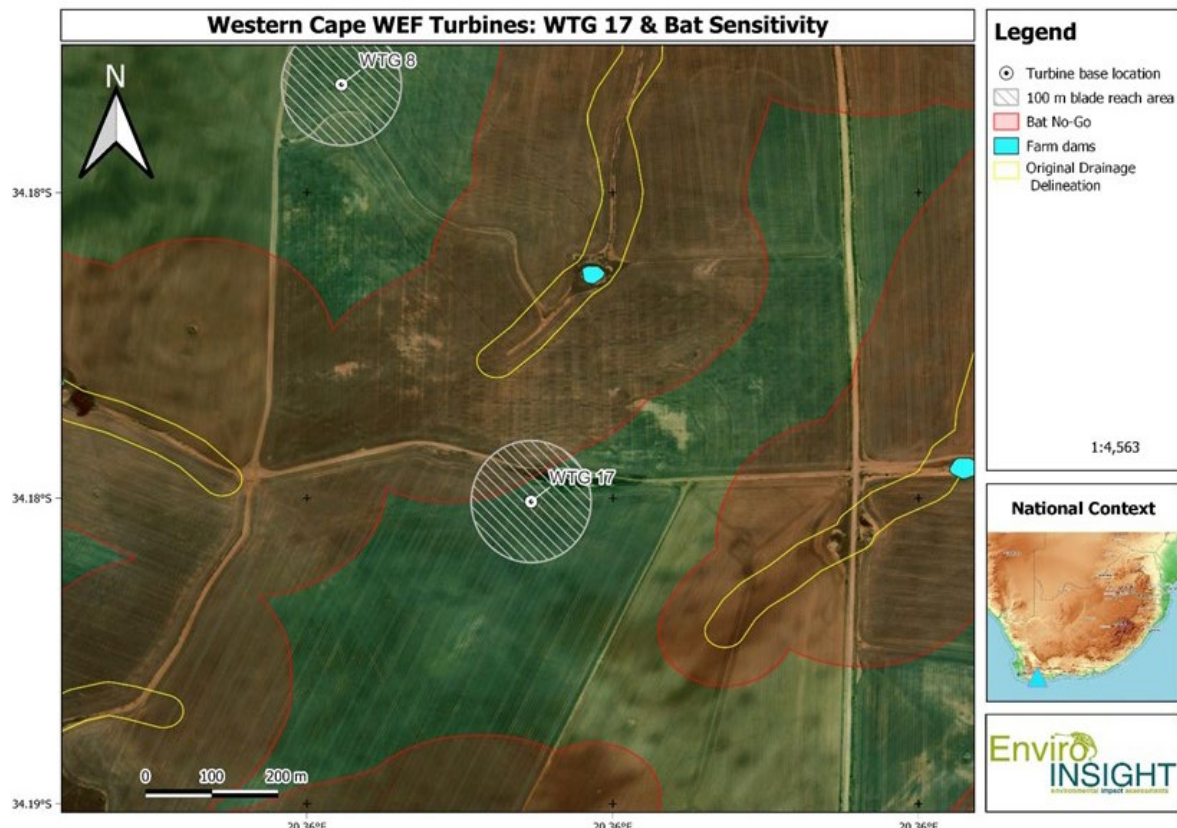


Figure 7.4. Interaction between the turbine blade reach areas and the original Bat No-Go buffers for WTG 17

Rotor Sweep Area ("RSA")

Increasing the blade length from the authorised 80m to a maximum of 100m increases the total RSA of the WCWEF by 36% (Please refer to Table 2, section 5.3 in the specialist report (Appendix E)). An increase in RSA has the potential to increase anticipated impacts on bats & avifauna because all else being equal, a greater area of rotor movement increases the likelihood of flying animals colliding with the rotor. However, the following mitigating factors must be taken into account in evaluating this potential increase in the likelihood of collisions:

- Avoidance mitigation has been applied to ensure that turbines have been placed outside of sensitive areas (however see Table 7.1) where large numbers of animals (specifically bats) are likely to move and therefore interact with the turbines. Generous buffers have been applied around such areas (100m around habitats where high volumes of bat traffic are expected)
- Avoidance mitigation has been applied to ensure that turbines have been placed outside of important habitat likely to attract priority avifauna species for roosting/breeding purposes. Generous buffers have been applied around such areas (750m)
- The site selected for the WCWEF development hosts **no bat species of conservation concern** (ARCUS, 2021) and relatively few avifauna species of conservation concern which are at risk from turbine collisions, most of which occur in low densities in the area (Van Rooyen, 2021). Therefore, any additional fatalities from turbine collisions due to the increased RSA can likely be attributed to common species, which **decreases the severity of the potential impact**

Nevertheless, to **further mitigate** any potential additional impacts from the proposed changes in turbine technical specifications, the following recommendations are made:

1. Increased RSA - Bats:

At least **three** in addition to that for WTG16 Automated real-time bat monitoring and analysis systems “Smart Systems”, are recommended to be installed at the inception of WEF operation, to ensure pre-emptive bat fatality mitigation to account for the potential fatalities from increased RSA. Each of the “Smart Systems” should control automated SDOD on a group of nearby turbines so that independent SDOD can occur leading to minimised turbine downtime. The location of the “Smart Systems” (WTG 04, 05, 16, 24) and the group of turbines that each control (North, Central, West & East respectively) is shown in Figure 7.5.

In summary, a **combination** of the **already appropriately applied avoidance mitigation**, the **absence of bat species of conservation concern** in the project site and the **additional mitigation recommendations** (Smart Systems) are expected to **appropriately mitigate** any potential **increase in impact** from the greater RSA and positional changes on bats.

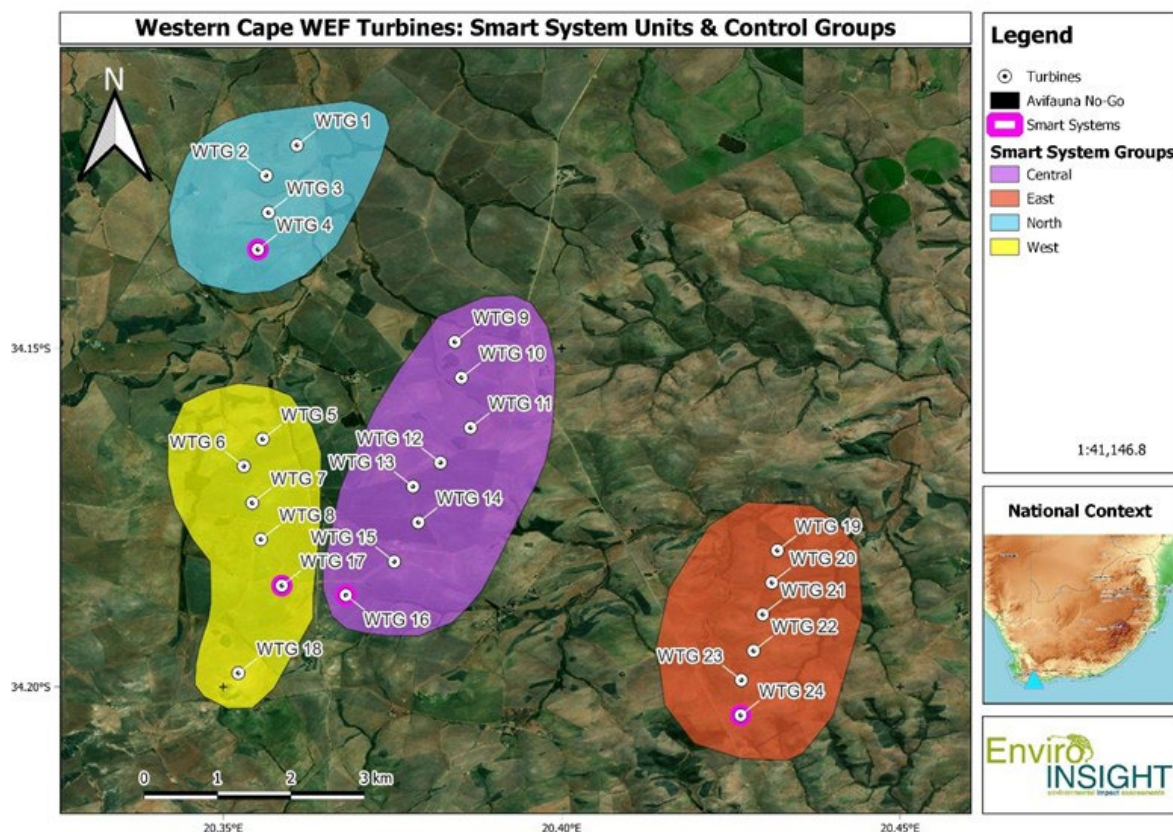


Figure 7.5. Suggested placement of four Smart Systems for bat fatality mitigation and the group of turbines they should control (Extracted from the Specialist Report).

2. Increased Rotor Sweep Area - Avifauna:

- One of the rotors on each turbine must be painted with red or black in order to increase visibility to birds – colour and design must follow the guideline currently in preparation (Simmons et al. in prep.).
- It is recommended that a minimum of four (4) Bioseco units are installed for the WEF, as a preventative mitigation measure at the locations shown in Figure 7.6 (WTG 04,05,09,13). This is a proven technological solution for automated Shut-Down on Demand (SDOD; see <https://bioseco.com>), which significantly decreases the likelihood that medium to large birds will collide with the turbines. All of the threatened species of conservation concern at risk from

collision with turbines are large-bodied birds (Van Rooyen 2021) and therefore easily detectable at large distances by the Bioseco units

- The four turbines selected to be fitted with Bioseco units (WTG 04,05,09 and13) are those closest to the avifauna No-Go areas

In summary, a **combination** of the **already appropriately applied avoidance mitigation**, the **low diversity and densities** of avifauna species of conservation concern in the project site, and the **additional mitigation recommendations (painted blade & Bioseco)** is expected to appropriately mitigate any potential increase in impact from the greater RSA on avifauna.”

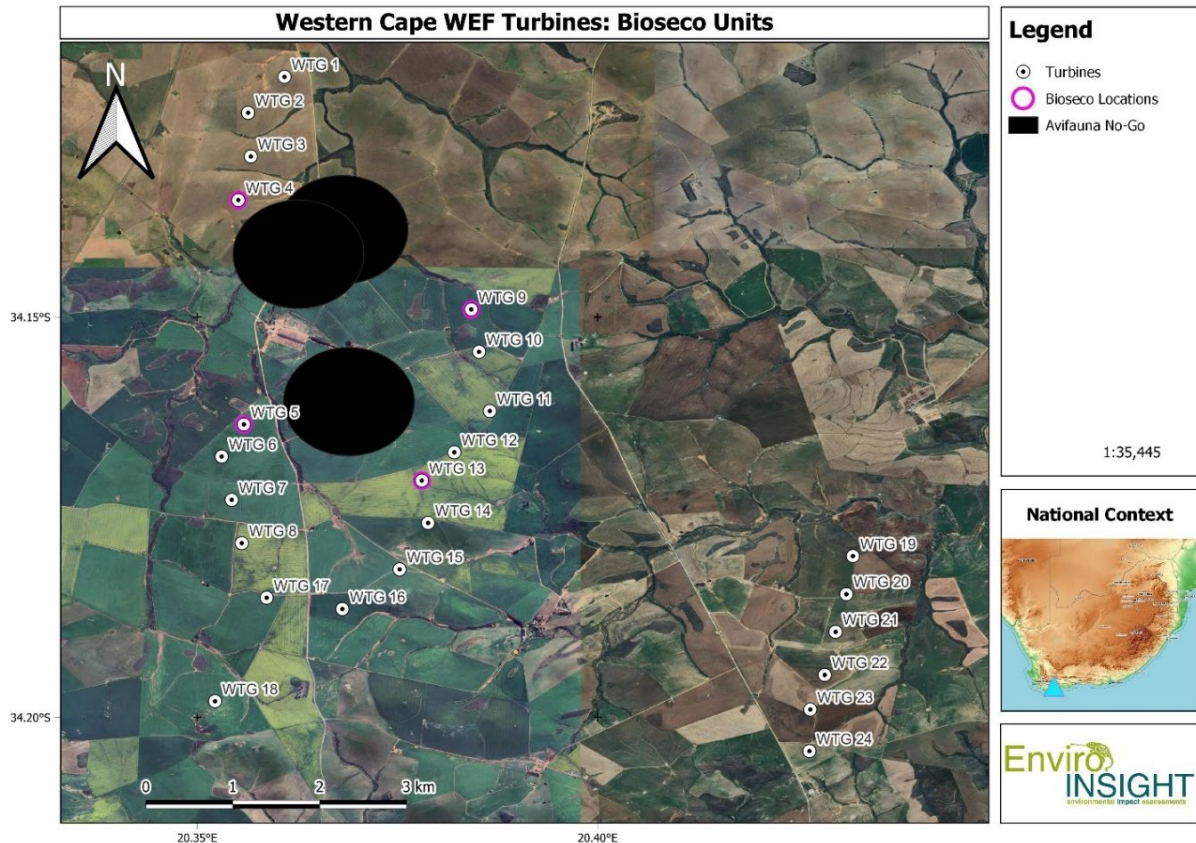


Figure 7.6. Suggested placement of Bioseco units in relation to the Avifauna No-Go areas (Extracted from the Specialist Report)

Rotor Sweep Height - Avifauna:

The lowest proposed ground clearance of the blade tip is 40m. Van Rooyen (2021) made no specific recommendations in this regard for avifauna. However, low-flying priority avifauna species at risk of collision due to lower ground clearance of turbines blades are expected to be detected by the proposed Bioseco systems in close proximity to the Avifauna No-Go areas (Figure 7.3) and therefore this mitigation measure should address any additional potential impacts for avifauna from the lower ground clearance. A caveat is that additional Bioseco systems may need to be installed following operational monitoring of carcasses – it is recommended that operational fatality monitoring inform the location and number of additional Bioseco units required. In particular, any fatalities of Critically Endangered or Endangered species (e.g. Denham’s Bustard) should necessitate immediate revision of the number and placement of the Bioseco units by an avifauna specialist to prevent any further fatalities.

Rotor Sweep Height - Bats:

ARCUS (2021) recommends the following: “The height of the lower blade swept height must be maximised, and should not be lower than 50 m if possible as turbines with a lower ground clearance run the risk of reaching the fatality thresholds sooner.”

While the developer has agreed to respect the recommended ground clearance of 50m if possible, flexibility is required to accommodate unpredictable component specifications and their availabilities at the time of construction. Consequently, potential impacts to bats due to a ground clearance of 40m is evaluated.

The initially deployed Smart Systems (as mentioned above), will **curtail turbines** during high levels of bat activity. The threshold of what determines high levels of bat activity must be evaluated by the bat specialist engaged with the operational monitoring, as bat activity during operation monitoring is often much more marked than during pre-construction (Solick et al., 2020). Typically, high levels of bat activity are indicated by ~15 bat passes per hour and these will likely only occur sporadically during Spring and Summer, when general activity is highest (see ARCUS 2021 Graph 1). Commitment by the developer to implement **real-time minimisation mitigation through the use of a Smart System** (or similar), is considered sufficient to mitigate any additional impacts to bats from a lower ground clearance as well as an increased RSA. Should the annual threshold of 251 fatalities be exceeded, revision of the number and placement of the Smart Systems required to reduce bat fatalities below the threshold must be undertaken by the appointed bat specialist for operational monitoring. This will also necessitate revision of bat activity threshold above which the Smart Systems will automatically apply curtailment.

Evaluation of impacts from placement of non-turbine infrastructure:

The final infrastructure layout (excluding turbines) was inspected in relation to current and historical satellite imagery. All permanent and temporary infrastructure has been placed on agricultural fields (either crops or managed grazing pastures), **limiting** the potential impact of **habitat loss** to both **avifauna and bats**. Although many of these infrastructure placements fall within both the bat and avifauna No-Go delineations, it is emphasised that these No-Go delineations were developed strictly with respect to the **placement of turbines** (ARCUS, 2021; Van Rooyen, 2021) and therefore the auxiliary infrastructure **may be placed** within these buffers.

Roads and powerlines have all followed the existing road and powerline infrastructure wherever possible and drainage line crossings have been **minimised** to prevent impacts to avifauna and bats in accordance with best practice.

The WTG collector powerlines must be placed underground **wherever possible**. Van Rooyen (2021) recommended that the 132kV powerline must be fitted with Bird Flight Diverters for its entire length. However given the known large number of Denham’s Bustards on the neighbouring site in summer (Overberg WEF) and their high level of susceptibility to collision with OHPLs (ARCUS 2022), as well as the known presence of high densities of Blue Cranes in the region, it is recommended that all novel overhead power lines (OHPLs) are required to be fitted with **Eskom-approved bird flight diverters (BFDs)**, and it is here further recommended that the type of BFD and spacings of the BFDs are optimised for Denham’s Bustards and Blue Cranes in consultation with an avifauna specialist prior to their fitment, to ensure that the latest and best available options are available (currently being researched). This is due to the high level of susceptibility by Bustards to collision with OHPLs, even when fitted with “standard” BFDs.

Cumulative Impacts:

Only 03 other wind energy facilities (WEF) are known for the region exceeding a 60km radius around the WCWEF (Figure 7.7). Given that there are so few facilities in the region and that they have been placed on agriculturally transformed areas of relatively low conservation value, cumulative impacts to avifauna and birds are expected to be **low in general**, assuming all other facilities also applied appropriate avoidance and minimisation mitigation as required by the competent authority. Contribution to regional cumulative impacts from any additional impacts arising from the proposed specification changes to the authorized turbines are expected to be negligible specifically since very clear additional mitigation measures have been recommended to address this. Any remaining residual impacts after application of the recommend mitigation is therefore likely to be **very low or entirely absent** and cannot meaningfully contribute to cumulative impacts.

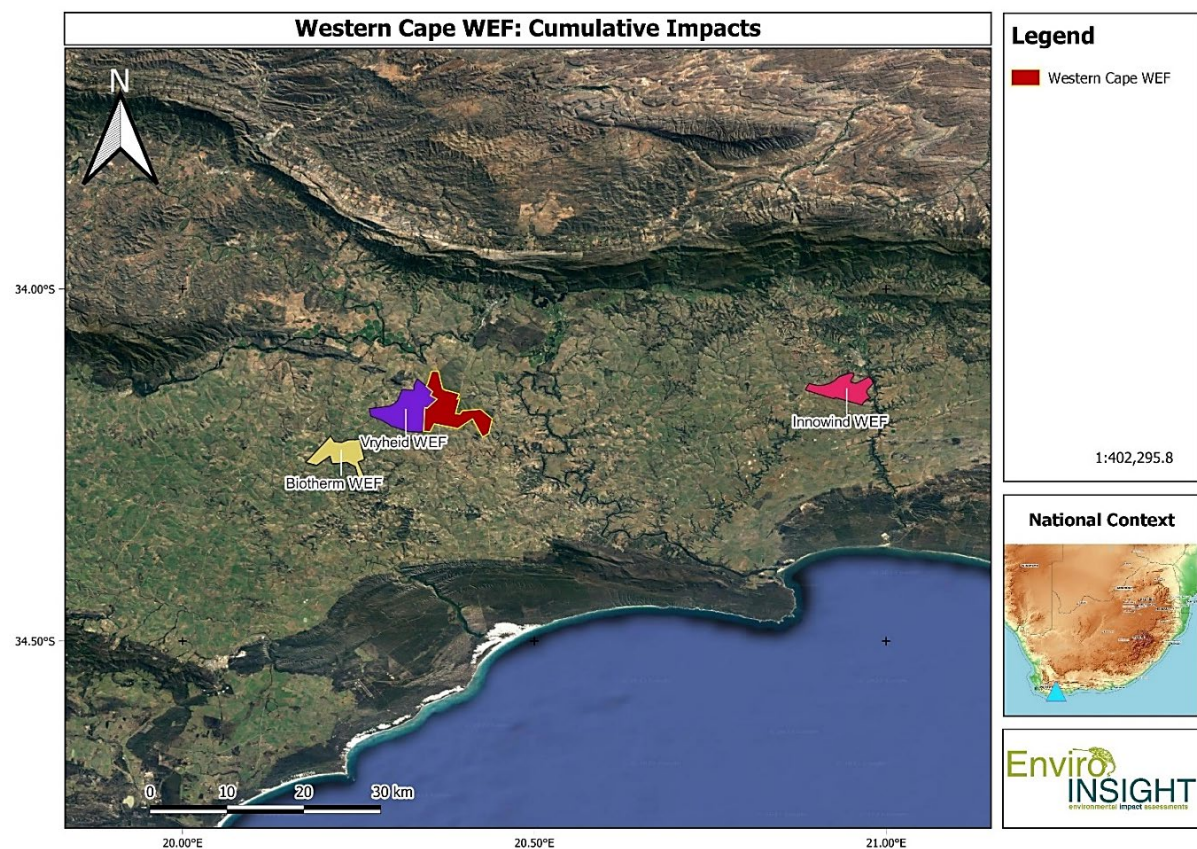


Figure 7.7. The WC WEF in relation to other renewable energy developments (REEA 2023 Q1) Extracted from the Specialist Report).

A detailed investigation into potential additional impacts to bats and avifauna from the turbine technical specification and positional changes has been provided above and it is concluded that some additional negative impact can be anticipated. This can however be negated with the application of the following additional mitigation measures in addition that stipulated in Van Rooyen (2021) and ARCUS (2021):

1. One of the rotors on each turbine must be painted with red or black in order to increase visibility to birds;
2. Implementation of an Observer-led Shutdown on Demand programme for the first three (03) years of the operational phase of the WEF. The findings of this programme must be used to implement additional mitigation measures for the WEF as part of an adaptive mitigation strategy.

3. *It is recommended that a minimum of four (04) Bioseco (or similar) units are initially installed for the WEF to enable automated Shut-Down on Demand and prevent collision by priority bird species around the Avifauna No-Go areas;*
4. *Implementation of real-time minimisation mitigation for bats through the initial use of four (04) Smart Systems (or similar) to automate Shut-Down on Demand and prevent collision by bat species when their level of activity is high;*
5. *Adaptive mitigation based on bat and avifauna fatality monitoring to manage the requirements for number of Bioseco and Smart System units, their locations and their thresholds (Smart System only) to allow for fatality minimisation to within acceptable limits.*
6. *An independent avifaunal specialist will be employed for avifauna monitoring during the Construction and Operation phases according to applicable guidelines. This includes fatality monitoring during the Operation phase only. Monitoring during the Operation phase will occur continuously for the first three (03) years of Operation whereafter the necessity for continuation will be determined by the appointed independent avifaunal specialist.”*

7.1.2.2 Conclusion

In conclusion, the specialist's Avifaunal and Bat sensitivity assessments of the of the area where the WEF is located, found that some additional negative impacts can be anticipated with the proposed amendments associated with the layout of the recent withdrawn amendment application (dated 26 November 2024). As a result, some additional mitigation measures were recommended to be implemented other than those already included in the existing EMPr as stipulated by the 2021 studies. These recommendations were accommodated in the Final Layout (dated 02 August 2024) to avoid the additional negative impacts and multiple layers of additional mitigation have now been implemented. These include blade painting, Automated Shut Down on Demand (ASDOD), Observer Led Shut Down on Demand (OLSDOD) and extended monitoring on site. The EMPr which will be submitted for approval as part of this application has been updated to reflect these additional mitigation measures.

Based on the available information, the proposed amendments are considered acceptable and implementable provided the updated specialist recommendations and mitigation measures detailed in this Report and the EMPrs (Appendix D) are implemented.

The Amendments are supported in terms of Avifaunal and Bat impacts

7.1.3 Ecological Impact Findings (Updated Specialist Report 2024)

7.1.3.1 The Ecological Specialist findings for the proposed amendments to the WEF is as follows:

*“Both the original assessed layout and the final layout (dated 02 August 2024), largely avoid all the identified patches of High sensitivity vegetation, and consequently both are likely to have a **Very Low negative botanical impact, before and after mitigation, which is the same as the No Go alternative.** The specialist has been on site and a final walk-through for the identification of botanically sensitive areas should not be necessary at this stage, as all are clearly shown in my sensitivity mapping and IA report. A further walk through is not going to add any value.*

The project does not traverse any Protected areas and no statutory buffer zones are required for vegetation in accordance with the National Environmental Management: Protected Areas Act (NEM:PAA Act 57 of 2003).

*There are **no indigenous plant species** on the project property that are TOPS listed, but at least 7 SCC (Species of Conservation Concern) were recorded, all in the mapped areas of High sensitivity. These were outlined in the Botanical Assessment of 2021, and the conclusion was that none of the proposed infrastructure (at that stage) would impact significantly on any of the SCC (TOPS listed species were not addressed, as they were not relevant/present). I can confirm now that the revised layout is also unlikely to impact on any of the SCC, and no relocation is thus necessary.*

Recent layout changes (Nov 2023 and August 2024) are not associated with any new botanical impacts, except in two specific areas:

*1) WTG 17 and its associated road access and hardstand is likely to impact on an area of about 0.15ha of partly disturbed vegetation that was mapped as being of High sensitivity. However, based on current satellite imagery (July 2023) the impacted area is already heavily degraded and would now be mapped as only Medium sensitivity habitat. The significance of loss of this area is thus only **Low – Medium negative.***

*2) The upgrading of the river crossing west of the substation (road to WTG4) will be associated with loss of largely natural riverine vegetation in this area, totaling less than 0.1ha. The significance of loss of this area is also **Low – Medium negative***

There are hence no significant or material changes to my original impact assessment significance findings in terms of the natural vegetation on site.”

7.1.3.2 Conclusion

In conclusion, the specialist's assessment of the ecological sensitivity of the area where the WEF is located, reaffirms that The Project continues to have a **low negative and acceptable impact**. The proposed amendments and final layout neither enhance nor diminish The Project's ecological impact. As a result, no additional mitigation measures are deemed necessary to be implemented other than the already provided measures indicated within the 2021 study that has been included within the EMPr.

Based on the available information, the proposed amendments are considered acceptable and implementable provided the updated specialist recommendations and mitigation measures detailed in this Report and the EMPrs (Appendix D) are implemented.

The Amendments are supported in terms of Ecological impacts

7.1.4 Freshwater Impact Findings (Updated Specialist Report 2024)

7.1.4.1 The Freshwater Specialist findings for the proposed amendments to the WEF is as follows:

“Following a desktop analysis, verified during a two day site visit undertaken in October 2023 of the freshwater ecosystem delineations undertaken by FEN (2023) and BlueScience (Pty) Ltd (2021) in relation to the proposed project layout of the WCWEF, the specialist determined that the delineations can be deemed fit for purpose and are adequate for the purposes of informing the project footprint and location of infrastructure, and for determining the perceived impact significance of possible impacts on the receiving freshwater environment. Where necessary, the delineations of some freshwater ecosystems were refined and presented below.

*It is **confirmed** that no wind turbines or their associated hard stands are located directly within any freshwater ecosystem nor within the 32 m ZoR in accordance with the NEMA. Based on the assessed layout, a small portion of the hardstand associated with WTG10 is located within 80 m of a degraded valley bottom wetland, thus, assuming that the orientation thereof cannot be further refined, additional care will need to be taken during the construction phase at that site to prevent potential indirect impacts to downgradient freshwater ecosystems. However, no special measures over and above those outlined within the specialist report (Appendix E) (and implemented in conjunction with the additional specialist measures) are required.*

As much as feasible, existing roads will be utilised, although it will be necessary to upgrade the roads to accommodate specialised transport vehicles. Where new road crossings and upgrades to existing crossings are required, it is imperative that the provided mitigation measures are implemented to minimise the cumulative impact of additional road crossings over freshwater ecosystems, especially those which already have several road crossings such as the Kluitjieskraal River.

In terms of ancillary and electrical infrastructure, most activities are not expected to directly affect the receiving freshwater environment, with the possible exception of powerline crossings, depending on the construction method (i.e. underground vs overhead). Additional care must be taken around Construction Camp and Laydown areas 2, and 3, the gatehouse and security building, the O&M building and the warehouse and workshop, as these are located within 100 m of the Kluitjieskraal River, and will be high traffic, high utilisation areas during both the construction and operational phases. Thus, the potential for indirect impacts relating to these areas is greatly increased but can be acceptably reduced with the strict implementation of mitigation measures.

*Nevertheless, the specialist **concurs** with the findings of BlueScience (Pty) Ltd (2021) that with the exception of road and powerline crossings, the proposed project is likely to have an **overall low impact significance**. Crossings over the freshwater ecosystems carry the potential to pose moderate significance impacts, however with the strict implementation of well-developed, site-specific, cogent mitigation measures, the significance can be acceptably reduced.*

The proposed layout being requested for approval as part of the Part 2 amendment application has been optimised and refined to avoid and minimise encroachment on the freshwater ecosystems and their associated 32 m NEMA ZoR, and as such, the perceived impact significance is further reduced.

Therefore, on that basis, it is the specialist's opinion that provided the appropriate measures are implemented throughout all phases of the proposed development, including the rehabilitation measures provided by FEN (2023), the proposed Western Cape WEF may be considered for authorisation in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) as amended."

7.1.4.2 Conclusion

The assessment of freshwater ecosystems for the proposed amendment to the WEF layout provide a good basis for approval. The specialist's review **confirms** that the layout dated 02 August 2024 effectively avoids direct placement of wind turbines within freshwater ecosystems, demonstrating a responsible approach. Additionally, the incorporation of specified mitigation measures, as outlined in the specialist's report, and the inclusion of these measures within the EMPr ensures that potential impacts are well-managed.

Based on the available information, the proposed amendments are considered acceptable and implementable provided the updated specialist recommendations and mitigation measures detailed in this Report and the EMPs (Appendix D) are implemented.

The Amendments are supported in terms of Freshwater impacts.

7.1.5 Heritage Impact Findings (Updated Specialist Report 2024)

7.1.5.1 The Heritage Specialist findings for the proposed amendments to the WEF is as follows:

*“The research examined various types of heritage resources present in the application areas, particularly the cultural landscape and built environment. However, **no notable archaeological heritage resources were discovered** within the planned WEF development's boundaries and connected infrastructure. During the field evaluation, four farm werfs were examined, and **one historic farm cemetery was discovered**.*

*The palaeontology of the WEF project site was initially rated as having a Medium to Very High Sensitivity, according to the SAHRIS palaeosensitivity map. However, subsequent field surveys and previous palaeontological assessments in the region indicate that the bedrock and superficial sediments in the area are, in fact, of **Low Palaeosensitivity**.*

*As part of the Part 2 Amendment Application PGS conducted a walkdown of the final infrastructure and footprint areas. During the walkdown, a **single findspot** was identified, characterised by a rocky silcrete area disturbed by farming and ploughing of soils. This findspot (SW01) contained numerous weathered silcrete lithic artefacts, all of which were determined to belong to the Early Stone Age based on the presence of a specific handaxe and their size. Despite the ground covering obstructing the view, the area was densely populated with finds, with a total of **18 artefacts** discovered within a 5x5 meter radius. The findspot is disturbed with no apart context and is deemed of low heritage significance with an IIC grading.*

The recommendations as contained in the original HIA was implemented during the final layout design (dated 02 August 2024) for the WCWEF. These included buffered distances from roads and farmsteads and the recommended a walkdown of the final layout.

*Considering the changes proposed in the Part 2 Amendment Application as well as the outcomes of the walkdown, the impact with the implementation of the **original recommendations** (HIA, 2021) as well as the management plan, the specialist **does not foresee any additional impact or change** in impact load from the original HIA and its ratings.”*

7.1.5.2 Conclusion

In conclusion, the specialist's assessment of the Heritage and Palaeontological sensitivity of the area where the WEF is located, reaffirms that The Project continues to have a **negative low** impact and **no additional impact** or change are foreseen. The proposed amendments and final layout dated 02 August 2024 neither enhance nor diminish The Project's heritage impact. As a result, no additional mitigation measures are deemed necessary to be implemented other than the already provided measures indicated within the 2021 study that has been included within the EMPr.

Based on the available information, the proposed amendments are considered acceptable and implementable provided the updated specialist recommendations and mitigation measures detailed in this Report and the EMPrs (Appendix D) are implemented.

The Amendments are supported in terms of Heritage impacts.

7.1.6 Noise Impact Findings (Updated Specialist Verification Report 2024)

7.1.6.1 The Noise Specialist findings for the proposed amendments to the WEF is as follows:

*“The projected calculated noise levels at the abutting farmhouses (receptors A to S as presented within the specialist report, Appendix E) for the use of a Goldwind or Vestas type wind turbine with a noise level at hub height of 112.7dBA and 110.5dBA respectively was used in the projections. With the proposed amendments the majority of the farmhouses is situated within the vicinity of a **lower than threshold level** of 45.0dBA and it will only be the farmhouses identified as “I” and “M” (as illustrated within the specialist report) which will be exposed to higher than the threshold level of 45.0dBA, these noise levels are:*

1. Receptor I - a noise level of 47.0dBA with the Goldwind type wind turbine
2. Receptor M – a noise level of 48.0dBA with the Goldwind type wind turbine
3. Receptor M – a noise level of 46.0dBA. with the Vestas type wind turbine

*The 45.0dBA was approved by the Department of Environment Affairs as the benchmark ambient noise level for the EA (DFFE Reference Number 14/12/16/3/3/1/2437), However the Western Cape Noise Regulations, 2013 refer to a noise disturbance that the residual noise level **may be exceeded by 3.0dBA** where the residual noise level is **lower** than the rating level. An increase above the recommended noise level of 45.0dBA is insignificant and **will not be easily detected by the occupants of I and M.***

*The change in the technical specifications and the micro siting of some of the wind turbine (WTGs 1, 3, 10, 11, 12, 15, 18, 21, 22 and 24) and the projections done on the potential noise propagation revealed that the changes will be in line with the Western Cape **Noise Control Regulations, 2013**. When the final selection is done on the type of wind turbine to be used this must be taken into consideration and an assessment be made of the technical specifications of the type of wind turbine, to ensure that the recommended noise level of 45.0dBA and noise spectrum of the turbines on an individual and cumulative basis will be in line with the Western Cape Noise Control Regulations, 2013.*

*This must be verified by an approved environmental noise specialist before the installation of the turbines. The projected noise levels at the residential properties (A to S) will fall **below the recommended noise level of 45.0dBA** except at noise receptors M and I (the noise levels falls within the specifications of the Noise Control Regulations) whereby the projected and/or potential noise increase **will be insignificant.**”*

7.1.6.2 Conclusion

In conclusion, the specialist's assessment of the noise sensitivity of the area where the WEF is located, reaffirms that The Project continues to have a **“very low”** acceptable impact. The proposed amendments and final layout neither enhance nor diminish The Project's noise impact. As a result, no additional mitigation measures are deemed necessary to be implemented other than the already provided measures indicated within the 2021 study that has been included within the EMPr.

Based on the available information, the proposed amendments are considered acceptable and implementable provided the updated specialist recommendations and mitigation measures detailed in this Report and the EMPrs (Appendix D) are implemented.

The Amendments are supported in terms of Noise impacts.

7.1.7 Social Impact Findings (Updated Specialist Report 2024)

7.1.7.1 The Social Specialist findings for the proposed amendments to the WEF is as follows:

*“The findings of the Social Impact Assessment (SIA) (2021) indicate that the proposed WCWEF will result in several social and socio-economic **benefits**, including creation of temporary employment opportunities and contributions to local economic income during the construction phase with this enhancement being **Medium Positive**. The findings of the SIA also indicate that the majority of the potential negative impacts associated with the construction, operational and decommissioning phase are likely to be **Low Negative, with mitigation**. The majority of potential negative impacts can therefore be effectively mitigated if the recommended mitigation measures are implemented. Based on the findings of the SIA (2021), the No-Development Option would represent a lost opportunity for South Africa to improve energy security and supplement its current energy needs with clean, renewable energy. Given South Africa’s current energy security challenges and its position as one of the highest per capita producers of carbon emissions in the world, this would represent a negative social cost. The site is also located within the Overberg REDZ. The area has therefore been identified as suitable for the establishment of renewable energy facilities. The WCWEF is supported on condition that the **recommendations/mitigation measures** included in the specialist report 2021 (Appendix E) are implemented. The study states that **no fatal flaws** are related to any of the socio-economic impacts assessed.*

*As indicated there will be no change to the number of wind turbines. The changes are technical and are linked to the size of the wind turbines and the final positioning of the facility and associated infrastructure (dated 02 August 2024). Based on the specialists experience of the area the changes will have **no material bearing** on the findings of the Socio-Economic Assessment undertaken by Dr Bloom (October 2021). The findings of the 2021 study and associated enhancement and mitigation measures therefore remain valid. The proposed Part 2 Amendment for the authorised WCWEF is therefore supported and the layout dated 02 August 2024 is therefore supported.”*

7.1.7.2 Conclusion

In summary, the proposed amendments to the WCWEF receive support from a social perspective. The 2021 SIA highlights significant social and economic benefits, along with manageable negative impacts with appropriate mitigation measures. Importantly, the proposed changes, do not change the findings of the 2021 SIA. This underscores The Project's continued alignment with its original social and economic objectives. Consequently, these amendments can be approved, ensuring The Project remains steadfast in its commitment to fostering social and economic well-being while adapting to evolving needs in renewable energy development.

Based on the available information, the proposed amendments are considered acceptable and implementable provided the updated specialist recommendations and mitigation measures detailed in this Report and the EMPs (Appendix D) are implemented.

The Amendments are supported in terms of Social impacts.

7.1.8 Traffic Impact Findings (Updated Specialist Report 2024)

7.1.8.1 The Traffic Specialist findings for the proposed amendments to the WEF is as follows:

*“Based on historical traffic counts the growth in traffic volumes along the surrounding road network is low and it is **not expected** that the traffic volumes would have increased significantly since July 2021. The current traffic volumes along the roads in the site vicinity will still well within the capacity of these roads. The **extent of the proposed development has not changed** and with proposed change in the technical specifications and the final layout (02 August 2024) the trip generation reported for the construction phase in the July 2021 Traffic Impact Assessment (“TIA”) will remain unchanged. The increase in traffic volumes as a result of historic growth in the site vicinity since July 2021 will not result in any change in the findings and recommendations reported. The surrounding road network still has sufficient capacity to accommodate the proposed development without any upgrades to the existing infrastructure.*

A Transportation Management Plan has also been drafted by the specialist and has been included to the EMPr (Appendix D).

*Therefore, the impact assessment and findings of the TIA - July 2021 report are still valid and remains unchanged in **support** of the Part 2 Amendment Application for the WCWEF project, which is compiled in terms of the EIA Regulations 2014 (as amended).”*

7.1.8.2 Conclusion

In conclusion, the specialist's assessment of the traffic sensitivity of the area where the WEF is located, reaffirms that the WEF and supporting structures continues to be acceptable and implementable from a Traffic perspective. The proposed amendments and final layout (dated 02 August 2024) neither enhance nor diminish The Project's traffic impact. As a result, no additional mitigation measures are deemed necessary to be implemented other than the already provided measures indicated within the 2021 study that has been included within the EMPr.

Based on the available information, the proposed amendments are considered acceptable and implementable provided the updated specialist recommendations and mitigation measures detailed in this Report and the EMPrs (Appendix D) are implemented.

The Amendments are supported in terms of Traffic impacts.

7.1.9 Visual Impact Findings (Updated Specialist Report 2024)

7.1.9.1 The Visual Specialist findings for the proposed amendments to the WEF is as follows:

“The visual impact report is based on the final layout (06 November 2023) for the authorised WCWEF and the technical specification upgrades.

Possible Visual Implications of the proposed amendments

1. *Due to the larger size of turbines, it is possible that they may be visible over a wider area than the smaller authorised structures;*
2. *Due to the larger size of turbines, it is possible that they may more obvious than the smaller authorised structures;*
3. *Due to the larger size of turbines, it is possible that they may affect a greater number of stakeholders with shadow flicker than the smaller authorised structures; and*
4. *The pattern painted on one of the blades is a device that has been adopted in other countries to make the rotor more obvious to avifauna. This has been proven to reduce bird strikes and so is supported. From a landscape and visual perspective the coloured bands on a rotor blade will make the rotor more visually obvious particularly from close viewpoints. Whilst visibility will be subject to weather conditions and aspect, it is anticipated that these bands will not be highly obvious from distances exceeding 5km and are unlikely to be visible at 10km. In terms of more sensitive viewpoints from the Bontebok National Park, their impact is anticipated to be negligible.*

Visibility

It is acknowledged that the landscape within which the development is proposed is not flat. However, the nature of the structures being a relatively slim and light coloured is such that they are likely to be indiscernible from its background well within distances.

Zones of Theoretical Visibility (“ZTV”) are defined as “a map usually digitally produced showing areas of land within which a development is theoretically visible”

*In order to highlight additional areas of impact, the ZTV of the authorised and proposed turbine layouts have been overlaid on Figure 7.8 presented below. The ZTV of the **authorised turbines** are represented in **red** and the ZTV of the **proposed turbines** is indicated in **blue**. The comparative analysis of the authorised and proposed turbines, it is obvious that:*

- *The proposed additional height will generally **not make a significant difference** in the visibility of the project to protected areas. The exception to this is the southern edge of the Bontebok National Park where the turbines are likely to be visible to the southern section of the National Park;*
- *To the north, north-east, north-west and west of the project there is **little difference in visibility** between the authorised and proposed alternatives;*
- *The largest difference in visibility is to the south within the 5km buffer and to the and west outside the 5km buffer. These areas are generally comprised of farmland. The main receptors that could be affected are residents of farmsteads.*

*Whilst the proposed turbine structures are taller than the authorised, they are positioned in **similar locations as turbines associated with the authorised layout**. In general therefore, the proposed turbines will be seen from the **same areas** as the authorised turbines with some additional areas.*

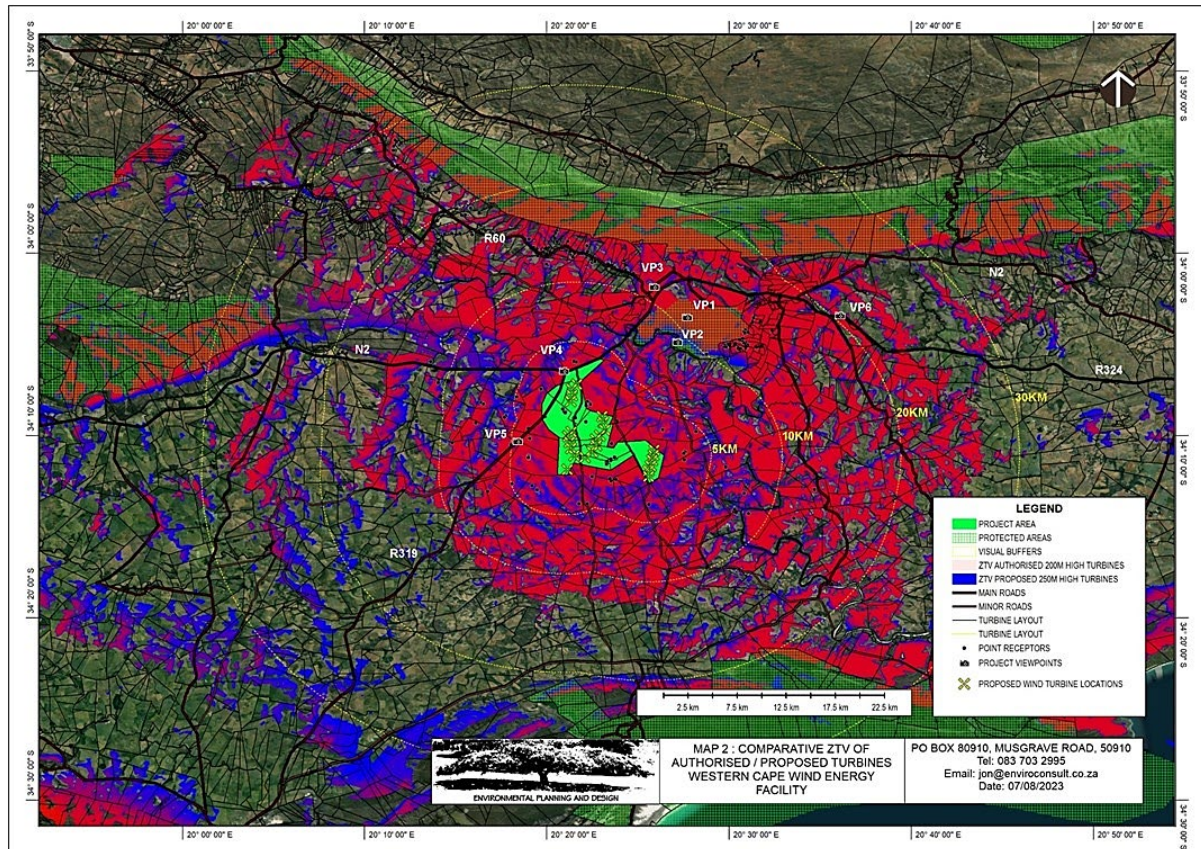


Figure 7.8. Comparative Zones of Theoretical Visibility (“ZTV”) of authorised and proposed turbines WCWEF

Assessment

According to the visual specialist, the main change is that the turbine structures will be visible over a **slightly wider area**, however the **change is not significant enough to justify an increase** in the extent rating. Therefore, due largely to the distances involved, the proposed specification amendment will not result in any significant change in likely landscape and visual impacts.

In addition, there will be low level increases in the intensity of impacts, particularly for closer viewpoints (within 5km), as a greater extent of individual turbine structures will be visible. This can also not be classified as a sufficient change to justify an increase in the impact rating.

Therefore, from a landscape and visual impact perspective, there is no reason why the proposed amendment should not be authorised.

The specialist confirm that the Final Project Layout (dated 02 August 2024) have been reviewed and compared with the latest layout that were assessed in the Addendum to the Visual Impact Assessment for the Part 2 Amendment Application dated November 2023.

The following points are confirmed:

- Wind Turbines 1, 3, 10, 11, 12, 15, 18, 21, 22 and 24 have been “micro relocated”. It is understood that this relocation is a maximum of 50m from the originally proposed location. This will not affect the assessed impacts detailed in our report and the proposed relocations will not result in noticeable changes in the simulations presented in the report;
- The hardstand orientation at Wind Turbines 13, 14, and 21 have changed. These hardstands are located at a significant distance from and will not be visible to any sensitive receptors;

- *The routing for the WTG Collectors (underground) has changed, to mostly follow road reserve. These cable runs will be underground. There will be a small amount of disturbance during cable laying, however, once trenches are backfilled and grassed, the locations of the collectors will not be visually obvious;*
- *The routing of the 33kV OHPL has been optimized. The realigned OHPL runs parallel to the alignment that was included in the original project layout. This will have no visual implication.*
- *The Substation has been moved adjacent to FE Overberg's IPP Substation. As the new substation will be adjacent to the existing Substation this will help to minimise the extent of the affected landscape.*
- *The BESS has been removed and replaced with a construction camp and laydown area. The removal of the BESS will result in less electrical infrastructure being obvious in the landscape"*

7.1.9.2 Conclusion

In conclusion, the specialist's assessment of the visual sensitivity of the area where the WEF is located, reaffirms that the WEF and supporting structures continues to be acceptable and implementable from a Visual perspective. The proposed amendments and final layout (dated 02 August 2024) neither enhance nor diminish The Project's visual impact. As a result, no additional mitigation measures are deemed necessary to be implemented other than the already provided measures indicated within the 2021 study that has been included within the EMPr.

Based on the available information, the proposed amendments are considered acceptable and implementable provided the updated specialist recommendations and mitigation measures detailed in this Report and the EMPrs (Appendix D) are implemented.

The Amendments are supported in terms of Visual impacts.

7.2 UPDATED Site Matrix (Opportunities and Constraints MAPPING)

In terms of Regulation 3 (h) and (ix) of GNR 326, Appendix 1, of the NEMA EIA Regulations (2014, as amended), a matrix is required to inform a Basic Assessment Process or a Scoping and EIA Process. Although not strictly required here, TMG have produced a set of matrices for all components of The Project, which includes updated specialist spatial information which was used to guide detailed design parameters on the site to arrive at the final layout design (dated 02 August 2024) to **satisfy** Condition 13 of the EA.

Terms of Reference:

1. Specialists were requested to provide a site matrix based on the requirements of Appendix 1 Regulation 3(h) (ix); of GN No. R. 326 of the NEMA EIA Regulations (2014, as amended).
2. Specialist were requested to provide a matrix for each component of The Project to **ensure optimal accuracy and positioning for each specific component of the facility**, as follows:
 - a. **Wind Turbine Generators (WTG) Matrix:** this matrix is designed to target the specific potential impacts and influences that WTGs have on the site.
 - b. **Associated infrastructure Matrix:** this matrix is designed to target the specific potential impacts and influences of the associated infrastructure. The infrastructure includes the substation facility, operations and maintenance buildings (which includes control centre, warehouses and workshops, and visitor's centre and offices) as well as the internal roads (up to 12m wide with a servitude of up to 20m wide) and the powerlines which includes the 132kV Overhead Powerline ("OHPL") and the 33kV WTG collectors (overhead or underground cabling).
3. The site maps were informed by expert assessment and consolidated by a GIS specialist and are presented as a **consolidated component site matrix**, for each component and which is presented below (Figures 7.9 and Figure 7.10).
4. The matrices maps provided have guided the final layout design (dated 02 August 2024) to ensure a practical and environmentally acceptable solution for the site.
5. These matrices maps indicate the consolidated sensitivity features from each specialist input on each component.
6. All sensitive features e.g., Important Bird Areas, Critical Biodiversity Areas, Ecological Support Areas, heritage sites, wetlands, pans and drainage channels All "no-go" and buffer areas that will be affected by the components undercover; have been identified and included within these maps as a set of matrices.

Description of the areas (colour coded for ease of reference):

- **Developable** means areas that are not sensitive and accordingly do not have any development constraints
- **Acceptable / Developable with mitigation** means areas that have some sensitivity but development can proceed with specified mitigation measures which have either reduced or removed the identified risk to acceptable levels
- **No-Go / Not Developable** means areas that have sensitivity of a nature that are either not mitigatable or would represent a fatal flaw should design extend into these areas, traditionally known as a "no-go" areas.

Developable Area	Acceptable Area	Not Developable
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7.2.1 Opportunities and Constraints Map for the WTG's

Within the final layout design of the Western Cape Wind Energy Facility, each WTG has been strategically positioned to avoid the red, No-Go areas in accordance with the principles of practicability and feasibility (Figure 7.9). WTGs situated within the yellow areas mean that their locations are deemed acceptable, provided that the prescribed mitigation measures outlined in Section 7.1 and the EMPr (Appendix E), as articulated by the Professional Team are implemented. Both the Professional Team and the EAP are satisfied with the placement and micro-siting of the WTGs as proposed within the final layout dated 02 August 2024.

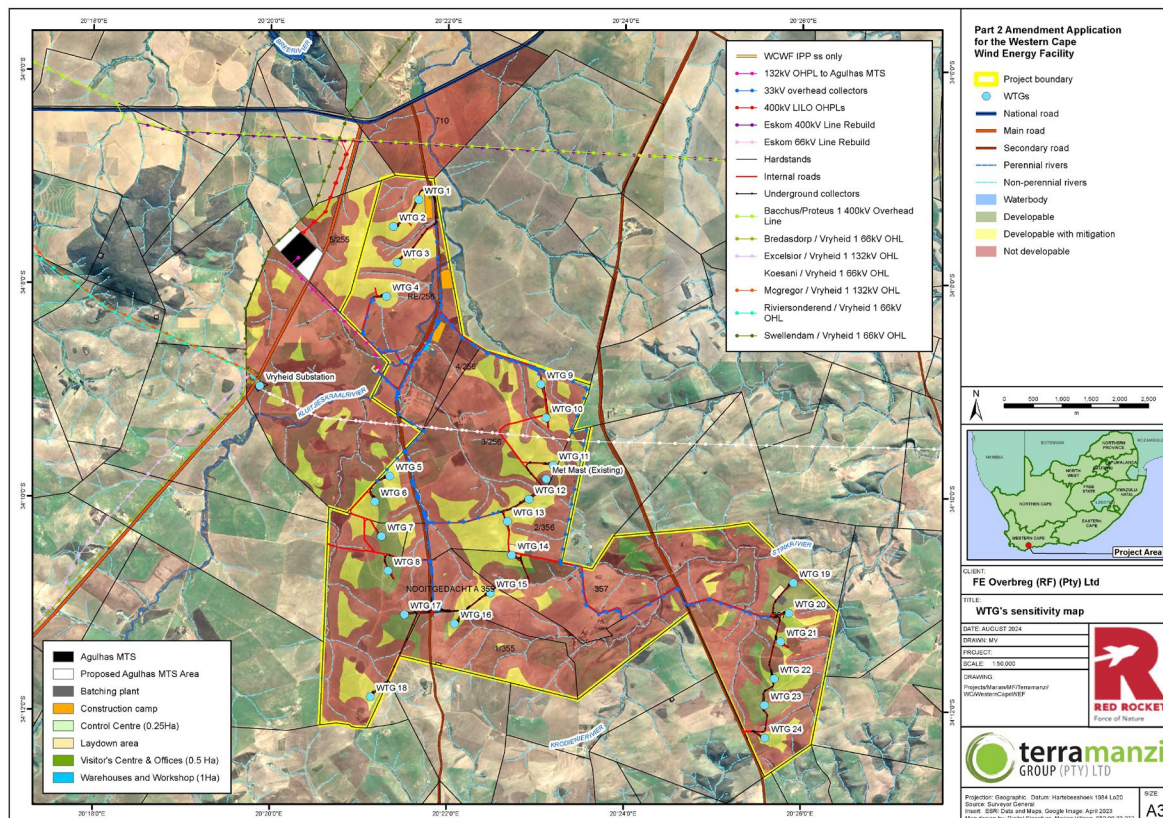


Figure 7.9. Opportunities and Constraints in comparison to the WTG's final positioning

7.2.2 Opportunities and Constraints Map for associated infrastructure

Substation and permanent infrastructure

The design of the substation component and operations and maintenance buildings (which includes control centre, warehouses and workshops, and visitor's centre and offices) has been optimised based on its proximity to the planned Eskom Agulhas Main Transmission Substation (MTS) and has also been designed to avoid the No-Go red areas.

Internal roads

The design of internal roads within the WCWEF prioritises avoidance of the No-Go areas. To optimise the road network, many of the internal roads have been aligned with existing routes. In certain areas, however, some internal roads will require widening or construction to accommodate various necessary elements, such as cut and fill requirements, side drains, stormwater control measures, turning areas, and adequate vertical and horizontal turning radii to ensure the safe transportation of WTG components.

Powerlines

The powerline components have been designed to avoid no-go areas. There are two aspects to this component, as follows:

- The 132kV Overhead Powerline (OHPL) to the Agulhas MTS is placed within an acceptable area and appropriate mitigations measures area detailed to ensure low impact to the environment.
- The 33kV WTG collectors between the turbine components (**specifically the above-ground design**) is considered **sensitive primarily from an avifaunal perspective**. Where the proposed 33kV OHPL crosses any No-Go areas, it is a specialist requirement that the cabling in these areas needs to go underground to ensure that potential impacts here are mitigated to acceptable levels. **Therefore, a combination of above-ground OHPL and underground OHPL cabling for the 33kV routing will take place as aligned with the matrix undercover.**

The associated permanent infrastructures (Substation, Internal Roads and Powerlines) are within areas acceptable locations (Figure 7.10), provided that the prescribed mitigation measures outlined in Section 7.1 and the EMPr (Appendix E), as articulated by the Professional Team are strictly implemented. Both the Professional Team and the EAP are satisfied with the placement of the associated permanent infrastructure within this finalised layout.

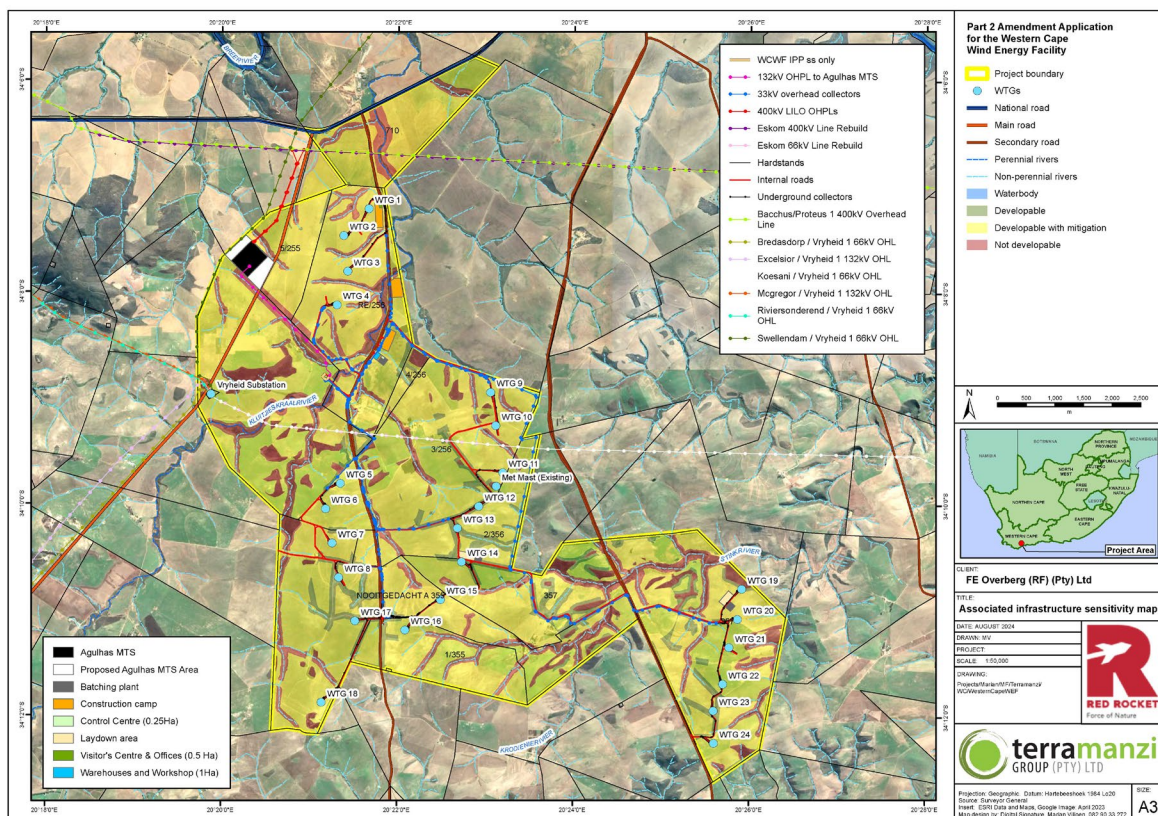


Figure 7.10. Opportunities and Constraints in comparison to the associated infrastructure final positioning

8 FINAL LAYOUT AS PER CONDITION 13 OF THE EA

The project was initially granted EA on 12 December 2021 with DFFE Reference number: 14/12/16/3/3/1/2437. As per Condition 13 of the EA, the final site layout plan for the Western Cape Wind Energy Facility ("WCWEF") must be submitted to the DFFE¹⁵. The following conditions apply as per the EA to allow consideration of the DFFE to approve the final layout (dated 02 August 2024):

13. A final site layout plan for the 140MW Western Cape Wind Energy Facility, substation and all associated infrastructure, as determined by the detailed engineering phase and micro-siting of the wind turbine positions, and all mitigation measures as dictated by the final site layout plan, must be submitted to the Department for approval prior to construction. A copy of the final site layout map must be made available for comments to register Interested and Affected Parties and the holder of this Environmental Authorisation must consider such comments. Once amended, the final development layout map must be submitted to the Department for written approval prior to commencement of the activity. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible e.g., roads. The layout map must indicate the following:

- 13.1. The position of wind turbines and associated infrastructure;*
- 13.2. Internal Roads indicating width;*
- 13.3. Wetlands, drainage lines, rivers, stream and water crossing of roads and cables;*
- 13.4. All sensitive features e.g., Important Bird Areas, Critical Biodiversity Areas, Ecological Support Areas, heritage sites, wetlands, pans and drainage channels that will be affected by the facility and associated infrastructure;*
- 13.5. The BESS, substation(s) inverters and/or transformer(s) sites including their entire footprint;*
- 13.6. Connection routes (including pylon positions) to the distribution/transmission network;*
- 13.7. All existing infrastructure on the site, such as roads;*
- 13.8. Soil heaps (temporary for topsoil and subsoil and permanently for excess material);*
- 13.9. Buildings, including accommodation; and*
- 13.10. All "no-go" and buffer areas.*

The layout as described in the project description of the authorised BAR in 2021, is being amended to accommodate the **final layout design** (dated 02 August 2024). In order to enable the commercial and contractual obligations, and in furtherance of the Conditions of the EA, specifically Condition 13. Specialist assessments were crucial to identify and evaluate potential impacts within their respective areas of expertise associated with the layout and provided guidance to the final layout design. The iterative and collaborative design process between the EAP, Specialists and the Project Design Team, with a detailed engineering phase, micro-siting of the wind turbine positions, the Final layout dated 02 November 2023 is hereby presented for approval. This Motivation Report was compiled as part of the process to **satisfy** Conditions 13 of the EA. A set of spatial matrices (refer to [Section 7.2](#) of this Motivation report) were produced for all components of the Project and which include updated specialist spatial information which was used to guide detailed design parameters on the site to arrive at the **final layout design** (dated: "02 August 2024" and presented in **Figure 1.4 and Appendix A** of this motivation report) for approval.

Both the Professional Team and the EAP are satisfied with the final layout design dated 02 August 2024. Please note that the Applicant hereby submits the final layout design (dated **02 August 2024**), as

¹⁵ Department of Forestry, Fisheries and the Environment ("DFFE") is the CA for the WCWEF project.

per condition 13 of the EA to the DFFE for **approval**. The final site layout map is made available (within this Part 2 Amendment process) for comments from registered I&AP's¹⁶.

¹⁶ *Interested and Affected Parties*

9 ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

The project was initially granted EA on 12 December 2021 with DFFE Reference number: 14/12/16/3/3/1/2437. As per Condition 14 if the EA, the EMPr was **not approved**. Conditions 13 to 19 must be complied with in order for the Competent Authority to approve the EMPr, which have accordingly been satisfied with this Part 2 Amendment Process of which this EMPr forms part of. **The following conditions apply as per the EA:**

Condition 13:

13. A final site layout plan for the 140MW Western Cape Wind Energy Facility, substation and all associated infrastructure, as determined by the detailed engineering phase and micro-siting of the wind turbine positions, and all mitigation measures as dictated by the final site layout plan, must be submitted to the Department for approval prior to construction. A copy of the final site layout map must be made available for comments to register Interested and Affected Parties and the holder of this Environmental Authorisation must consider such comments. Once amended, the final development layout map must be submitted to the Department for written approval prior to commencement of the activity. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible e.g., roads. The layout map must indicate the following:

- 13.1 The position of wind turbines and associated infrastructure;*
- 13.2. Internal Roads indicating width;*
- 13.3. Wetlands, drainage lines, rivers, stream and water crossing of roads and cables;*
- 13.4. All sensitive features e.g., Important Bird Areas, Critical Biodiversity Areas, Ecological Support Areas, heritage sites, wetlands, pans and drainage channels that will be affected by the facility and associated infrastructure;*
- 13.5. The BESS, substation(s) inverters and/or transformer(s) sites including their entire footprint;*
- 13.6. Connection routes (including pylon positions) to the distribution/transmission network;*
- 13.7. All existing infrastructure on the site, such as roads;*
- 13.8. Soil heaps (temporary for topsoil and subsoil and permanently for excess material);*
- 13.9. Buildings, including accommodation; and*
- 13.10. All “no-go” and buffer areas*

Condition 14:

14. The Environmental Management Programme (EMPr) submitted as part of the BAR dated October 2021 is not approved and must be amended to include measures as dictated by the final site layout map and micro siting, and the provisions of this Environmental Authorisation. The EMPr must be made available for comments by registered Interested and Affected Parties and the holder of this Environmental Authorisation must consider such comments. Once amended, the final EMPr must be submitted to the Department for written approval prior to commencement of the activity.

Condition 15:

15. The EMPr amendments must include the following:

- 15.1. All recommendations and mitigation measures recorded in the BAR and the specialist reports as included in the BAR dated October 2021.*
- 15.2. The requirements and conditions of this authorisation.*
- 15.3. An effective monitoring system to detect any leakage or spillage of any hazardous substances during their transportation, handling, use and storage. This must include*

precautionary measures to limit the possibility of oil and other toxic liquids from entering the soil or storm water systems.

- 15.4. *A transportation plan for the transport of turbine components, main assembly cranes and other large equipment.*
- 15.5. *An environmental sensitivity map Indicating environmentally sensitive areas and features Identified during the EIA process.*
- 15.6. *Measures to protect hydrological features such as mams, rivers, pans. wetlands., dams and their catchments, and other environmentally sensitive areas from construction impacts Including the direct or indirect spillage of pollutants.*

Condition 16:

16. Part C (Site Specific Environmental Attributes) of the generic EMPs (Annexure Land Annexure M) for the Overhead Line and Substation and all associated infrastructure, submitted as part of the BAR dated October 2021, is not approved. Part C must be amended to include measures as dictated by the final site layout map and micro siting and the provisions of this Environmental Authorisation. Part C of the generic EMPs must be made available for comments to registered Interested and Affected Parties and the holder of this Environmental Authorisation must consider such comments. Once amended, the generic EMPs must be submitted to the Department for written approval of Part C prior to commencement of the activity.

Part C of the generic EMPs must be amended to include the following:

- 16.1. *The requirements and conditions of this Environmental Authorisation*
- 16.2. *Measures as dictated by the final site layout map and micro-siting*
- 16.3. *All recommendations and mitigation measures recorded In the BAR and the specialist reports as included In the BAR dated October 2021*
- 16.4. *An effective monitoring system to detect any leakage or spillage of any hazardous substances during their transportation, hand ling, use or storage. This must Include precautionary measures to limit the possibility of oil and other toxic liquids from entering the soil or storm water systems*
- 16.5. *A fire management plan to be implemented during the construction and operation of the facility;*
- 16.6. *A re-vegetation and habitat rehabilitation plan. The plan must provide for restoration to be undertaken as soon as possible after completion of construction activities, to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats.*
- 16.7. *An aquatic Rehabilitation and Monitoring plan, particularly for watercourse features that will be infilled and/or excavated;*
- 16.8. *A stormwater management plan: and*
- 16.9. *The final site layout map.*

Condition 17:

17. The EMPs must be Implemented and strictly enforced during all phases of the project. It shall be seen as a dynamic document and shall be Included In all contract documentation for all phases of the development once approved.

Condition 18:

18. Changes to the approved EMPs must be submitted in accordance with the EIA Regulations applicable at the time.

Condition 19:

19. The Department reserves the right to amend the approved EMPs should any impacts that were not anticipated or covered in the BAR be discovered.

The Final facility EMP and associated Generic EMP has been updated to ensure compliance with Conditions 13 to 19 of the EA and includes management plans in the Appendices. The Final EMP is attached as Appendix D, it is made available (within this Part 2 Amendment process) for comments from registered I&AP's and is hereby submitted to the Competent Authority for Approval.

Please note that the Applicant is not applying for an EMP Amendment, but rather the EMP is being updated to ensure compliance with the above-mentioned Conditions of the EA and to approve the EMP with this Part 2 Amendment.

10 PUBLIC PARTICIPATION PROCESS

10.1 OBJECTIVES OF THE PUBLIC PARTICIPATION PROCESS

The Public Participation Process is designed to provide information to and receive feedback from Interested and Affected Parties (I&AP), thus providing organisations and individuals with an opportunity to raise concerns and make comments and suggestions regarding the proposed amendments to the existing environmental authorisation.

The principles for the Environmental Impact Assessment (EIA) that determine communication with society at large are included in the principles of the National Environmental Management Act (NEMA) (Act 107 of 1998, as amended) and are elaborated upon in General Notice 657, titled “Guideline 4: Public Participation” (Department of Environmental Affairs and Tourism, 19 May, 2006), which states that: *“Public participation process means a process in which potential interested and affected parties (I&APs) are given an opportunity to comment on, or raise issues relevant to, specific matters.”* Public participation is an essential and regulatory requirement for an environmental authorisation process and must be undertaken in terms of the Environmental Impact Assessment (EIA) Regulations GN R.982 (December 2014, as amended). Public participation is a process that is intended to lead to a joint effort by stakeholders, technical specialists, the authorities and the proponent/developer who work together to produce better decisions than if they had acted independently.

The Public Participation Process (PPP) is designed to provide sufficient and accessible information to Interested and Affected Parties (I&AP’s) in an objective manner.

The purpose of the Public Participation Process (PPP) is to enable I&AP’s to:

- Understand the context of the Motivation Report
- Become informed and educated about the proposed changes and its potential impacts
- Raise issues of concern and suggestions for enhanced benefits
- Contribute relevant local information and traditional knowledge to the environmental assessment

10.2 REQUIREMENTS FOR THIS PUBLIC PARTICIPATION PROCESS

Regulation 32 of the NEMA EIA Regulations (2014, as amended) state the following:

“1. The applicant must within 90 days of receipt by the competent authority of the application made in terms of regulation 31, submit to the competent authority –

(a) a report, reflecting-

- (i) an assessment of all impacts related to the proposed change;*
 - (ii) advantages and disadvantages associated with the proposed change;*
 - (iii) measures to ensure avoidance, management and mitigation of impacts associated with such proposed change; and*
 - (iv) any changes to the EMPr;*
- which report –*

(aa) had been subjected to a public participation process, which had been agreed to by the competent authority, and which was appropriate to bring the proposed change to the attention of potential and registered interested and affected parties, including organs of state, which have jurisdiction in respect of any aspect of the relevant activity, and the competent authority, and

(bb) reflects the incorporation of comments received, including any comments of the competent authority, or

(b) a notification in writing that the report will be submitted within 140 days of receipt of the application by the CA as significant changes have been made or significant new information has been added to the report which changes or information was not contained in the report consulted on during the initial PPP contemplated in sub-regulation (1)(a) and that the revised report will be subjected to another PPP of at least 30 days.”

In terms of 32 (1)(a), the Amendment Report will be subjected to public consultation in line with Regulation 41.

10.3 STEPS TAKEN TO NOTIFY POTENTIALLY INTERESTED AND AFFECTED PARTIES

Identification of Stakeholders

The I&AP database developed during the previous BAR process (completed in 2021 and updated in 2024) was used to inform all I&AP's during this public participation process.

Communication with Stakeholders

In terms of the NEMA EIA Regulations (2014, as amended), potential Interested and Affected Parties (I&AP's) were given **30 calendar days** within which to register and issue comments on the Draft Amendment Motivation Report (and associated annexures). Initially, the public consultation was advertised (newspapers and site notices) for commencement from **26 August 2024** up to and including **25 September 2024**, however, due to a last minute logistical delay with certain Applicant documentation being provided to the EAP, the public consultation commenced a week later, from **02 September 2024** up to and including **02 October 2024**, in accordance with statutory requirements.

- An **existing stakeholder database** from the previous BAR completed in 2021, and the withdrawn amendments application (dated November 2023), was referenced as a baseline. The contact details of these stakeholders have been verified and updated in preparation for this public consultation process and these registered stakeholders have been notified via written notice (by email) of the Amendment Application and the availability of the Draft Motivation Report for a **30-day comment period**
- **Site notice boards** (with minimum dimensions of 60cm x 42cm) were erected on the boundary of the WCWEF site (at strategic viewable locations) per statutory requirements.
- **An advertisement** was placed in one **local newspaper** (Langeberg Bulletin) per statutory requirements.
- The Draft Motivation Report (and associated appendices) for comment was made available to stakeholders through an online electronic link, via email:
<https://terramanzi.egnyte.com/fl/Rl3ioqvleY>

Comments received during this public consultation have been recorded in a Comments and Response Report which have been included with the Final Motivation Report for Decision.

10.4 AUTHORITY CONSULTATION

The following Interested and Affected Parties (I&APs) have been notified of the Project as part of the Public Participation process:

Commenting Authorities:

- Department of Forestry, Fisheries and the Environment (DFFE): Directorate of Integrated Environmental Affairs
- Department of Transport
- Department of Water Affairs
- Department of Human Settlements
- Department of Water and Sanitation (DWS)
- Department of Mineral Resources and Energy (DMRE)
- Department of Cooperative Governance and Traditional Affairs
- Department of Agriculture, Land Reform and Rural Development (DALRRD)
- Eskom Holdings
- South African Civil Aviation Authority (CAA)
- National Energy Regulator of South Africa (NERSA)
- South African National Roads Agency Limited
- Telkom
- Department of Science and technology
- Upper Breede Management Agency
- Air Traffic and Navigation Services (ATNS)
- SANPARKS
- Transnet SOC Ltd
- Department of Environmental Affairs
- South African Heritage Resource Agency (SAHRA)
- South African Square Kilometres Array
- Western Cape Department of Environmental Affairs & Development Planning (DEA&DP)
- Department of Transport and Public Works: Western Cape
- Department of Economic Development and Tourism: Western Cape
- South African National Roads Agency (SANRAL)
- Department of Economic Development and Tourism: Western Cape
- Department of Water Affairs: Western Cape
- Department of Agriculture: Western Cape
- Council of Scientific and Industrial Research
- Transport and Public Works
- Overberg District Municipality
- Swellendam Local Municipality

Conservation Groups:

- Birdlife South Africa
- Overberg Renosterveld Conservation Trust
- Overberg Integrated Conservation Trust
- Agri Western Cape
- Swellendam Heritage Association
- Endangered Wildlife Trust
- Sustainable Energy Society of Southern Africa (SESSA)
- South African National Parks
- Overberg Crane Group
- Theewaters Conservancy

- Groenlandberg Conservancy
- Cape Nature
- Nieuwerust Noise Watch Group
- Earthlife Africa
- Agri SA
- Agri Western Cape
- Birdlife Overberg
- Agriculture Research Council
- South African Wind Energy Association (SAWEA)
- South African Alternative Energy Association (SAAEA)
- Swellendam Heritage Association
- South African Bat Assessment Advisory Panel (SABAAP)
- Sentech
- South African National Biodiversity Institute (SANBI)
- Swellendam Tourism Office
- Overberg Water Board

10.5 PROOF OF NOTIFICATION

A copy of the contents and proofs of the site notices, contents of the adverts and notification letters, as well as details of the interested and affected parties and the occupiers of the affected properties notified, is contained in Appendix D.

10.6 LIST OF REGISTERED INTERESTED AND AFFECTED PARTIES (I&AP'S)

The lists (databases) containing contact details of all persons notified during PPP is contained in Appendix D.

11 EAP RECOMMENDATIONS AND CONCLUDING REMARKS

The Amendments being applied for, are for authorisation for the Final Layout (02 August 2024) and the associated revised Environmental Management Programme (EMPr) and Generic EMPrs, together with administrative amendments to accommodate the ceding of roles and obligations of the EA to FE Overberg (RF) (Pty) Ltd. to allow commercial operation.

These Amendments have been **assessed by the EAP and the Professional Team** as part of this report, in accordance with statutory requirements, in order to guide all final detailed layout design considerations for the site. This included revised specialist assessments and mapping exercises (sensitivity maps) which have ensured that the project as presented here aligns with the recommendations of the Professional Team, and also includes updated and final mitigation measures to inform the Environmental Management Programmes (“EMPrs”) for approval.

For the most part the investigation of potential environmental impacts associated with the proposed amendments indicate that the overall impacts identified, assessed and approved during the original permitting process **will remain the same and the impact significance has in fact decreased due to the additional mitigation measures implemented. These include automated shutdown on demand technologies for bats as well as triple tier mitigation measures for avifauna (blade painting, automated SDOD and observer led SDOD).**

The Final Layout (02 August 2024) now represents the best practicable environmental option and is a **buildable design** with the **overall potential impacts reduced** whilst still meeting BID requirements and commercial requirements.

A summary of the advantages and disadvantages of the proposed amendments within section 3.1 of this Report and provided below again for ease of reference.

Table 11.1. Advantages and Disadvantages of the proposed Amendments.

Amendment	Advantages of granting	Disadvantages of refusing
Administrative Amendment 1: Change the EA holder and update the contact details of the Holder of the EA	The EA will reference the correct contact details of the Holder of the EA.	If this Amendment is refused, the roles and obligations of the EA will not be ceded to the contracted entity and the EA will reference the incorrect contact details of the EA Holder
Substantive Amendment 1: Upgrade the technical specifications of the WTG to	The approval of this amendment will ensure the technical specifications of the WTGs that need to be upgraded due to a contractual agreement with Eskom, and the requirements to enhance the facility’s capacity.	If the Amendment is refused, the EA will reference the incorrect technical specifications and further, impinge on commercial and contractual obligations for the WEF
Substantive Amendment 2: Removal of any and all references to the Battery Energy Storage System (BESS) in the EA	Management actions outlined in the EA will only be applicable to infrastructure included in the Final Layout (dated 02 August 2024).	If this Amendment is refused, the EA will reference infrastructure not included in the in the Final Layout (dated 02 August 2024).

Substantive Amendment 3: Finalise the description of the main components details described on page 8 of the EA to reflect the final layout design	This is a statutory requirement of the EA and needs to be fulfilled.	If this amendment is refused, the statutory requirement of the EA will not be fulfilled in addition to the commercial and contractual obligations of the Wind Farm being adversely impacted.
Substantive Amendment 4: Update the technical details table of the WEF and associated infrastructure	This is a statutory requirement of the EA and needs to be fulfilled. The EA will then refer to the correct technical details for the final layout dated (02 August 2024).	If this amendment is refused, the statutory requirement of the EA will not be fulfilled in addition to the commercial and contractual obligations of the Wind Farm being adversely impacted.
Substantive Amendment 5: Update the coordinates of the WEF	This is a statutory requirement of the EA and needs to be fulfilled. The coordinates in the EA must be updated to reflect the final technical design.	If this amendment is refused, the statutory requirement of the EA will not be fulfilled, furthermore to the commercial and contractual obligations of the Wind Farm being adversely impacted, in addition to inaccurate geographical referencing for the final technical design being included in the EA, which is not logical.
Substantive Amendment 6: Approve the final layout (dated 02 August 2024) in furtherance of Condition 13 of the EA	This is a statutory requirement of the EA and needs to be fulfilled.	Should the amendment not be granted the final layout will not be submitted as per Condition 13 of the EA, therefore, The Project will not be compliant with a Condition of Authorisation.
Substantive Amendment 7: Approve the WEF EMPr and Generic EMPrs (OHPL & Substation) in order to fulfil the requirements of Conditions 14, 15 and 16 of the EA	This is a statutory requirement of the EA and needs to be fulfilled. The updated mitigation measures will allow for better management of impacts on site during construction, operation and decommissioning. The approval of the EMPrs includes the addition of information such as the final site layout and management plans.	Should the amendment not be granted, the EMPr and Generic Substation & OHPL EMPr will not be submitted as per Conditions 14, 15 and 16 of the EA. Therefore, The Project will not be compliant with the Conditions of Authorisation.

There were no flaws identified as part of this amendment process by the EAP or the independent Specialists.

Based on the available information presented within this Report, which has been informed through independent Specialist input, and is considered adequate, **the EAP finds no reason why the amendments applied for, shouldn't be authorised.**

12 OATH OF EAP UNDERTAKING ASSESSMENT

I, Ludwig van der Merwe, as the appointed EAP hereby declare/affirm:

- I act as the independent environmental assessment practitioner in this application;
- I have expertise in conducting environmental impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I will take into account, to the extent possible, the matters listed in Regulation 14 of the Regulations when preparing the application and any report relating to the application;
- I undertake to disclose to the applicant and the Competent Authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the Competent Authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the Competent Authority, unless access to that information is protected by law, in which case it will be indicated that such information exists and will be provided to the Competent Authority;
- I will perform all obligations as expected from an environmental assessment practitioner in terms of the Regulations;
- I am aware of what constitutes an offence in terms of Regulation 48 and that a person convicted of an offence in terms of Regulation 48(1) is liable to the penalties as contemplated in Section 49B of the Act; and
- I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Regulations.

Signature of the EAP:



Name of Company:

Terramanzi Group

Date:

15 October 2024